

From: [Air.Pollution Control](#)
To: [APC Permitting](#)
Subject: FW: Revised 28-0076 Adient Title V Renewal Application
Date: Tuesday, June 20, 2023 2:59:56 PM
Attachments: [28-0076 TV Application.pdf](#)

From: Kris Patrick Foster <kris.patrick.foster@adient.com>
Sent: Tuesday, June 20, 2023 8:29 AM
To: Air.Pollution Control <Air.Pollution.Control@tn.gov>
Cc: Tracy Kefauver <Tracy.Kefauver@tn.gov>; Jill Pratt <Jill.Pratt@tn.gov>; Ricki H Palmer <ricki.h.palmer@adient.com>; jeff.pfost@enviro-partners.com; Mat Weiss <mat.weiss@enviro-partners.com>
Subject: [EXTERNAL] Revised 28-0076 Adient Title V Renewal Application

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Please find attached Revised 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

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 Index

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 21 pages and they are numbered from page 1 to 21. 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

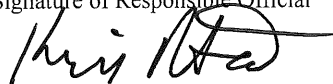
Telephone Number with Area Code

Kris P. Foster

931-363-5666

Signature of Responsible Official

Date of Application



6/20/2023

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

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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, TN		Zip code 38478-905	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 Kris P. Foster			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 kris.patrick.foster@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.gardner@adient.com	
TYPE OF PERMIT REQUESTED				
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>13. Permit requested for:</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;"> <p>Initial application to operate : <input type="checkbox"/></p> <p>Permit renewal to operate : <input checked="" type="checkbox"/></p> <p>Administrative permit amendment : <input type="checkbox"/></p> </div> <div style="width: 45%;"> <p>Minor permit modification : <input type="checkbox"/></p> <p>Significant modification : <input checked="" type="checkbox"/></p> <p>Construction permit : <input type="checkbox"/></p> </div> </div> </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 all 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) (Renewal Pending)
980244 Construction PSD Permit (28-0076-01)

17. Page number :

4

Revision number:

1

Date of revision:

6/19/2023



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 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:

5

Revision Number:

1

Date of Revision:

6/19/2023

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APC 3

TITLE V PERMIT APPLICATION STACK IDENTIFICATION

GENERAL IDENTIFICATION AND DESCRIPTION	
1. Facility name: Adiant US LLC Pulaski	
2. Emission source (identify): 28-0076-01 Polyurethane Foam Production (Automotive Seats)	
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: 3
7. Exhaust flowrate at exit conditions (ACFM): 22,250	8. Flow rate at standard conditions (DSCFM): 22,020
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): N/A _____ (°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.)? N/A	
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? <div style="text-align: center;"> _____ Yes <input checked="" type="checkbox"/> No </div> <p>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.</p>	
14. Page number: 6 Revision Number: 1 Date of Revision: 6/19/2023	



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 flow diagram point identification (s): F1 through F12		4. Year of construction or last modification: September 22, 2022 (PSD Major 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 UTM Horizontal: 493.569			
7. Describe this process (Please attach a flow diagram of this process) and check one of the following: <div style="display: flex; align-items: center; gap: 10px;"> <input type="checkbox"/> Batch <input checked="" type="checkbox"/> Continuous </div>			
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 APC26			
9. List the types and amounts of primary products produced by this process:			
Material	Storage/Material handling process	Average usage (units)	Maximum usage (units)
See APC26			
10. Process fuel usage:			
Type of fuel	Max heat input (10 ⁶ BTU/Hr.)	Average usage (units)	Maximum usage (units)
None			
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 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.			
13. Page number: 7 Revision Number: 1 Date of Revision: 6/19/2023			

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APC 19

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, VOC, and HAPs (TDI, MDI, DEOA)
- ☐ 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: _____

And every _____ days thereafter.

7. Page number: 8 Revision number: 1 Date of revision: 6/19/2023

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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. |

- | |
|---|
| 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. |
|---|

- | | | |
|----------------------|-----------------------|--------------------------------|
| 7. Page number:
9 | Revision number:
1 | Date of revision:
6/19/2023 |
|----------------------|-----------------------|--------------------------------|

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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 with source specific emission factors for quantification and reporting.
--

6. Method of monitoring and recording: Emissions are estimated as follows: 1. PM $(\text{Material Usage}) \times (\text{PM content}) \times 0.2375$ 2. VOC $(\text{Material Usage}) \times (\text{VOC content})$ 3. TDI, MDI, DEOA $(\text{Material Usage}) \times (\text{HAP content}) \times (\text{Emissions Factor})$ 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.
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7. Compliance demonstration frequency (specify the frequency with which compliance will be demonstrated): Monthly Calculations.
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8. Page number: 10	Revision number: 1	Date of revision: 6/19/2023
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APC 28

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	

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)
Particulate Matter (TSP)	9.9		≤ 9.9	
(Fugitive Emissions)				
Sulfur Dioxide				
(Fugitive Emissions)				
Volatile Organic Compounds	491.4		≤ 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 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			<1	
MDI 101-86-8			<1	
DEOA 111-42-2			<1	

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Revision number:

1

Date of revision

6/19/2023



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 <u>emissions summary for regulated air pollutants at this facility</u> 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)	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				
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:
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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	PSD Section V, Condition S1-4(A)	3.00 lb/hr daily	<3	IN
	Particulate	PSD Section V, Condition S1-4(A)	9.90 tons per	<9.9	IN
	VOC	PSD Section V, Condition S1-4(B)	491.40 tons of	<491.4	IN
	HAP	Individual HAP Compounds	10 tons	<10	IN
	HAP	Existing Title V Permit Condition	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)

11. Page number:

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1

Date of revision:

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APC 31

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 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.

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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 type="checkbox"/>	<input type="checkbox"/>
Contact Information (Responsible Official)	<input type="checkbox"/>	<input type="checkbox"/>
Contact Information (Technical)	<input type="checkbox"/>	<input type="checkbox"/>
Contact Information (Billing)	<input type="checkbox"/>	<input type="checkbox"/>
Type of Permit Requested	<input type="checkbox"/>	<input type="checkbox"/>
Accidental Release Information	<input type="checkbox"/>	<input type="checkbox"/>
Nonattainment/Additional Control Area Designation	<input type="checkbox"/>	<input type="checkbox"/>
List of Valid Permits	<input type="checkbox"/>	<input type="checkbox"/>
List and description of process emission sources, fuel burning installations, and incinerators	<input type="checkbox"/>	<input type="checkbox"/>
Flow diagram attached?	<input type="checkbox"/>	<input type="checkbox"/>
List of Insignificant Activities	<input type="checkbox"/>	<input type="checkbox"/>
List of Storage Piles	<input type="checkbox"/>	<input type="checkbox"/>
List of States within 50 Miles	<input type="checkbox"/>	<input type="checkbox"/>
Section 2: Emission Source Description Forms		
Forms are complete as received:		<input 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 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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General Identification and Description (Form APC 31, Items 1 and 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance Certification for Sources Currently in Compliance (Form APC 31, Item 3A)	<input 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 type="checkbox"/>
Identification of Sources Currently Not in Compliance (Form APC 31, Item 4A)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance Schedule for Sources Currently Not in Compliance (Form APC 31, Item 4B)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance Certification for Enhanced Monitoring (Form APC 31, Item 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>
Request for Permit Shield	<input type="checkbox"/>	<input type="checkbox"/>
Calculations on which emissions-related information are based	<input type="checkbox"/>	<input type="checkbox"/>
Identification of alternative operating scenarios, as applicable	<input type="checkbox"/>	<input type="checkbox"/>
Explanation of any proposed exemptions from otherwise applicable requirements	<input type="checkbox"/>	<input type="checkbox"/>
Other information needed for completeness (explain in comments)	<input type="checkbox"/>	<input type="checkbox"/>
Section 7: Comments		
Describe any missing information below or in a separate attachment:		
Section 8: Application Completeness		
Application is Complete	<input type="checkbox"/>	
Application is Incomplete	<input type="checkbox"/>	