

PUBLIC NOTICE

Adient US LLC has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for renewal of their existing major source (Title V) operating permit subject to the provisions of Tennessee Air Pollution Control Regulations 1200-03-09-.02(11) (Title V Regulations). A major source operating permit is required by both the Federal Clean Air Act and Tennessee's air pollution control regulations. However, it should be noted that this facility has a current major source operating permit.

The Title V operating renewal permit is identified as follows: Division identification number 28-0076/578338. The applicant is **Adient US LLC** (Facility ID 28-0076; Division renewal permit no. 578338) with a site address of 1890 Mines Road, Pulaski TN. They have applied for renewal of their existing major source (Title V) operating permit for their Polyurethane Automotive Seat Manufacturing Operation.

EPA has agreed to treat this draft permit as a proposed Part 70 significant permit modification and to perform its 45-day review provided by the law concurrently with the public notice period. If any substantive comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. In this case, EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Tennessee Air Pollution Control Division that comments have been received and resolved. The status regarding EPA's 45-day review of these permits and the deadline for submitting a citizen's petition can be found at the following website address:

<https://www.epa.gov/caa-permitting/tennessee-proposed-title-v-permits>

Copies of the application materials and draft/proposed permit are available for public inspection during normal business hours at the following locations:

Tennessee Department of Environment and Conservation Columbia Environmental Field Office Division of Air Pollution Control 1421 Hampshire Pike Columbia, TN 38401	and	Tennessee Department of Environment and Conservation Division of Air Pollution Control Davy Crockett Tower 500 James Robertson Parkway, 7 th Floor Nashville, TN 37243
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Also, if you require a copy of the draft/ proposed permit it is available electronically by accessing the TDEC Air Pollution Control Public Participation Opportunity (APC PPO) page:

<http://www.tn.gov/environment/ppo-public-participation/ppo-public-participation/ppo-air.html>

Questions concerning the source may be addressed to Elizabeth Terranova at (865) 594-2404 or by e-mail at Elizabeth.Terranova@tn.gov.

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on June 15, 2024. To assure that written comments are received and addressed in a timely manner, written comments must be submitted using one of the following methods:

1. **Mail, private carrier, or hand delivery:** Address written comments to Ms. Michelle W. Owenby, Director, Division of Air Pollution Control, Davy Crockett Tower, 500 James Robertson Parkway, 7th floor Nashville, Tennessee 37243.
2. **E-mail:** Submit electronic comments to air.pollution.control@tn.gov.

A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, Davy Crockett Tower, 500 James Robertson Parkway, 6th Floor, Nashville, TN 37243, 1-(866)-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

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

***** 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 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



**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	

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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	
<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>21</u> pages and they are numbered from page <u>1</u> to <u>21</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 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)	

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 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			
13. Permit requested for:			
Initial application to operate :	<input type="checkbox"/>	Minor permit modification :	<input type="checkbox"/>
Permit renewal to operate :	<input checked="" type="checkbox"/>	Significant modification :	<input checked="" type="checkbox"/>
Administrative permit amendment :	<input type="checkbox"/>	Construction permit :	<input type="checkbox"/>

(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

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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 Nashville, TN 37243
 Telephone: (615) 532-0554



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?**
 _____ Yes No

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.

14. **Page number:** 6 **Revision Number:** 1 **Date of Revision:** 6/19/2023

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APC 10

**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:
 Batch Continuous

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



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
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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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**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
(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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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)				

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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 Equivalent				

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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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 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 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)



**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)					

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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.

6. Page number: **16** Revision number: **1** Date of revision: **6/19/2023**

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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"/>

TENNESSEE AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243



OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations. The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: ***Draft***

Permit Number:
578338

Date Expires: ***Draft***

Issued To:
Adient US LLC

Installation Address:

**1890 Mines Road
Pulaski**

Installation Description:

**01 – Polyurethane Foam Manufacturing (Three Lines)
MACT Area Source, Subpart OOOOOO, PSD
(Flexible Polyurethane Foam Production and Fabrication Area Sources)**

Emission Source Reference No.: **28-0076**
Renewal Application Due Date: ***Draft***

Primary SIC: **25**

Information Relied Upon: **Title V Renewal Application dated June 20, 2023**

(Continued on the next page)

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS

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ATTACHMENT 3	Example Logs 1 through 5 for Particulate Matter and Volatile Organic Compounds	5 pages
ATTACHMENT 4	Notification of Changes In Responsible Official, Source, and Ownership Forms	3 pages
ATTACHMENT 5	General Provisions for 40 CFR 63 Subpart OOOOOO	2 pages
ATTACHMENT 6	Title V Fee Selection Form APC 36 (CN-1583)	2 pages

SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of Tennessee Air Pollution Control Regulations (TAPCR) paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

- A1. Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-03 and 0400-30

- A2. Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-03-09-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act. The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11)(e)2(i) and 1200-03-09-.02(11)(e)1(vi)(I)

- A3. Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11)(e)1(vi)(II)

- A4. The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. This permit supersedes any previous permits for sources included in the Title V application.

TAPCR 1200-03-09-.02(11)(e)1(vi)(III)

- A5. Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11)(e)1(vi)(IV)

- A6. Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

- A7. Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09.02(11)(e)1(v)

A8. Fee payment.

(a) The permittee shall pay an annual Title V emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) When paying annual Title V emission fees, the permittee shall comply with all provisions of TAPCR Rule 1200-03-26-.02 and paragraph 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one (1) allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31 will place such regulated emissions in the specific hazardous air pollutant under regulation. If the pollutant is also in the family of volatile organic compounds or the family of particulates, the pollutant shall not be placed in that respective family category.

2. A miscellaneous category of hazardous air pollutants shall be used for hazardous air pollutants listed at part 1200-03-26-.02(2)(i)12 that do not have an allowable emission standard. A pollutant placed in this category shall not be subject to being placed in any other category such as volatile organic compounds or particulates.

3. Each individual hazardous air pollutant and the miscellaneous category of hazardous air pollutants is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

4. Major sources that wish to pay annual emission fees for PM₁₀ on an allowable emission basis may do so if they have a specific PM₁₀ allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM₁₀ emission basis, it may do so if the PM₁₀ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM₁₀ emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM₁₀ emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.

5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of TAPCR subparagraph 1200-03-26-.02(2)(i).

6. Major sources that wish to pay annual emission fees for PM₁₀ on an allowable emission basis may do so if they have a specific PM₁₀ allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM₁₀ emission basis, it may do so if the PM₁₀ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM₁₀ emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM₁₀ emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of TAPCR subparagraph 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.

TAPCR 1200-03-26-.02 (3) and (9) and 1200-03-09-.02(11)(e)1(vii)

A9. Permit revision not required. A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

A10. Inspection and entry. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or an authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

(a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) As authorized by the Clean Air Act and Chapter 1200-03-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3.(ii)

A11. Permit shield.

- (a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:
1. Such applicable requirements are included and are specifically identified in the permit; or
 2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- (b) Nothing in this permit shall alter or affect the following:
1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
 2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
 4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.
- (c) Permit shield is granted to the permittee.
- (d) The permit shield does not apply to permit changes made under the minor permit modification procedures of TAPCR subpart 1200-03-09-.02(11)(f)5(ii) nor the administrative permit amendment procedures of TAPCR part 1200-03-09-.02(11)(f)4, except that the permit shield may be extended for administrative permit amendments that meet the relevant requirements of TAPCR subparagraph 1200-03-09-.02(11)(e), subparagraph 1200-03-09-.02(11)(f) and subparagraph 1200-03-09-.02(11)(g) for significant permit modifications.
- (e) The permit shield does not apply to off-permit changes made under the operational flexibility provisions of TAPCR part 1200-03-09-.02(11)(a)4.

TAPCR 1200-03-09-.02(11)(e)6 and 1200-03-09-.02(11)(f)4(iv)

A12. Permit renewal and expiration.

- (a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.
- (b) Provided that the permittee submits a timely and complete application for permit renewal the source will not be considered to be operating without a permit until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-03-09-.02(11).
- (c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)2 and 3, 1200-03-09-.02(11)(d)1(i)(III), and 1200-03-09-.02(11)(a)2

A13. Reopening for cause.

- (a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:
1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-03-09-.02(11)(a)2.
 2. Additional requirements become applicable to an affected source under the acid rain program.
 3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical

Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

(d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90 day time period.
2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.
3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under **Condition A13 (b)** and **Condition A13 (c)**.
4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to **Condition A13(d)**, he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR 1200-03-09-.02(11)(f)6 and 7.

A14. Permit transference. An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

- (a) Transfer of ownership permit application is filed consistent with the provisions of 1200-03-09-.03(6), and
- (b) Written agreement (Attachment 4) containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)4(i)(IV) and 1200-03-09-.03(6)

A15. Air pollution alert. When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-03-09-.03(1) and TAPCR 1200-03-15-.03.

A16. Construction permit required. Except as exempted in TAPCR 1200-03-09-.04, TAPCR 1200-03-09-.02(11)(f)5, and sources considered insignificant under TAPCR 1200-03-09-.04(5), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1)(a)

A17. Notification of changes. The permittee shall notify the Technical Secretary (Attachment 4) 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

- (a) change in air pollution control equipment
- (b) change in stack height or diameter
- (c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

A18. Schedule of compliance. The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3 , 1200-03-09-.03(8), 0400-30-38, 0400-30-39, and 40 CFR Part 70.5(c)

A19. Title VI.

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.
2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

A20. 112 (r). Sources which are subject to the provisions of Section 112(r) of the federal Clean Air Act or any federal regulations promulgated thereunder, shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. The annual certification is due in the office of the Technical Secretary no later than January 31 of each year. Said certification will be for the preceding calendar year.

TAPCR 1200-03-32-.03(3)

SECTION B

**GENERAL CONDITIONS for MONITORING,
REPORTING, and ENFORCEMENT**

- B1. Recordkeeping.** Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than at least 180 days.
- (a) Where applicable, records of required monitoring information include the following:
1. The date, place as defined in the permit, and time of sampling or measurements;
 2. The date(s) analyses were performed;
 3. The company or entity that performed the analysis;
 4. The analytical techniques or methods used;
 5. The results of such analyses; and
 6. The operating conditions as existing at the time of sampling or measurement.
- (b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.
- TAPCR 1200-03-09-.02(11)(e)1(iii)
- B2. Retention of monitoring data.** The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
- TAPCR 1200-03-09.02(11)(e)1(iii)(II)II
- B3. Reporting.** Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.
- TAPCR 1200-03-09-.02(11)(e)1(iii)
- B4. Certification.** Except for reports required under "State Only" requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- TAPCR 1200-03-09-.02(11)(d)4
- B5. Annual compliance certification.** The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):
- (a) The identification of each term or condition of the permit that is the basis of the certification;
- (b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
- (d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.
- * "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.
- ** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period

specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667

B6. Submission of compliance certification. The compliance certification shall be submitted to:

The Tennessee Department of Environment & Conservation Environmental Field Office specified in Condition E2(b) of this permit	and	Air and EPCRA Enforcement Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303
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TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

B7. Reserved

B8. Excess emissions reporting.

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

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. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60(Standards of performance for new stationary sources), 61(National emission standards for hazardous air pollutants) and 63(National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

B10. Reserved

B11. Report required upon the issuance of a notice of violation for excess emissions. The permittee must submit within twenty (20) days after receipt of the notice of violation, the data shown below to assist the Technical Secretary in deciding whether to excuse or validate the violation. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional

information, then this must be submitted within the same twenty (20) day time period. The minimum data requirements are:

- (a) The identity of the stack and/or other emission point where the excess emission(s) occurred;
- (b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation, and the operating data and calculations used in determining the magnitude of the excess emissions;
- (c) The time and duration of the emissions;
- (d) The nature and cause of such emissions;
- (e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
- (f) The steps taken to limit the excess emissions during the occurrence reported, and
- (g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the 20-day period specified shall preclude the admissibility of the data for consideration of excusal for malfunctions.

TAPCR 1200-03-20-.06(2), (3) and (4)

SECTION C

PERMIT CHANGES

- C1. Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:
- (a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-03-30.
 - (b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-03.
 - (c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
 - (d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-03-09-.04.
 - (e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
 - (f) The change shall not qualify for a permit shield under the provisions of part 1200-03-09-.02(11)(e)6.
 - (g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4 (ii)

- C2. Section 502(b)(10) changes.**
- (a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7 day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.
 - (b) The written notification must be signed by a facility Title V responsible official and include the following:
 1. a brief description of the change within the permitted facility;
 2. the date on which the change will occur;
 3. a declaration and quantification of any change in emissions;
 4. a declaration of any permit term or condition that is no longer applicable as a result of the change; and
 5. a declaration that the requested change is not a Title I modification and will not exceed allowable emissions under the permit.
 - (c) The permit shield provisions of TAPCR 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4 (i)

- C3. Administrative amendment.**
- (a) Administrative permit amendments to this permit shall be in accordance with 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
 - (b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR 1200-03-09-.02(11)(e), TAPCR 1200-03-09-.02(11)(f) and TAPCR 1200-03-09-.02(11)(g) for significant permit modifications.
 - (c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4

- C4. Minor permit modifications.**
- (a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(ii).
 - (b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.
 - (c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.
 - (d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

C5. Significant permit modifications.

- (a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(iv).
- (b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

C6. New construction or modifications.

Future construction at this source that is subject to the provisions of TAPCR 1200-03-09-.01 shall be governed by the following:

- (a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.
- (b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 1200-03-09-.02(11)(f)5(iv).
- (c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-03-09-.02(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-03-09-.02(11)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d) 1(i)(V)

SECTION D

GENERAL APPLICABLE REQUIREMENTS

D1. Visible emissions.

(a) With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, 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 twenty (20) percent for an aggregate of more than five minutes in any one hour or more than 20 minutes in any 24 hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of 20 percent (six-minute average) except for one six minute period per one hour of not more than 40 percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.

(b) Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or representative thereof upon request.

TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)

D2. General provisions and applicability for non-process gaseous emissions. Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-03-06-.03(2)

D3. Non-process emission standards. The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-03-06.**D4. General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-03-07-.07(2)

D5. Particulate emissions from process emission sources. The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-03-07.**D6. Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.**D7. Fugitive Dust.**

(a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
2. Application of asphalt, oil, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20.

TAPCR 1200-03-08

D8. Open burning. The permittee shall comply with the TAPCR 1200-03-04-.04 for all open burning activities at the facility.

TAPCR 1200-03-04

D9. Asbestos. Where applicable, the permittee shall comply with the requirements of 1200-03-11-.02(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-03-11-.02(d) and 40 CFR, Part 61

D10. Annual certification of compliance. The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

D11. Emission Standards for Hazardous Air Pollutants. The permittee shall comply with all applicable requirements of TAPCR Chapter 0400-30-38 for all emission sources subject to a requirement contained therein.

D12. Standards of Performance for New Stationary Sources. The permittee shall comply with all applicable requirements of TAPCR chapters 0400-30-39 and 1200-03-16 for all emission sources subject to a requirement contained therein.

D13. Gasoline Dispensing Facilities. The permittee shall comply with all applicable requirements of TAPCR Rule 1200-03-18-.24 for all emission sources subject to a requirement contained therein.

D14. Internal Combustion Engines.

- (a) All stationary reciprocating internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR Rule 0400-30-38-.01.
- (b) All stationary compression ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR Chapter 0400-30-39.
- (c) All stationary spark ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR Chapter 0400-30-39.

TAPCR 0400-30-38 and 39

D15. The permittee shall maintain and repair each emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

SECTION E

SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

28-0076	<u>Facility Description:</u> Polyurethane Foam Manufacturing
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E1. Fee payment: Allowable Emissions Basis.

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 28-0076

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	9.90	AEAR	Includes all fee emissions.
PM ₁₀	N/A	N/A	
SO ₂	N/A	N/A	
VOC	491.40	AEAR	Includes all fee emissions.
NO _x	N/A	N/A	
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)*			
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)**			
VOC FAMILY GROUP	N/A	N/A	These values are included in VOC above.
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	

NOTES

AAP The **Annual Accounting Period (AAP)** is a 12 consecutive month period that **either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis.** The Annual Accounting Period at the time of permit renewal issuance began July 1, 2023, and ends June 30, 2024. The next Annual Accounting Period begins July 1, 2024, and ends June 30, 2025, unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) of the TAPCR and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b) of the TAPCR, the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. Changes in fee bases must be made using the Title V Fee Selection form (Attachment 6), form number APC 36 (CN-1583), included as an attachment to this permit and available on the Division of Air Pollution Control's website.

N/A N/A indicates that no emissions are specified for fee computation.

AEAR **AEAR** indicates that an Actual Emissions Analysis is Required to determine the actual emissions of:

- (1) **each regulated pollutant** (Particulate matter, SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family), and
- (3) **the Miscellaneous HAP Category**
- (4) **the Specific HAP Category,** and
- (5) **the NSPS Category**

under consideration during the **Annual Accounting Period.**

- * **Category Of Miscellaneous HAP (HAP Without A Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, the **Miscellaneous HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).
- ** **Category Of Specific HAP (HAP With A Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.
- *** **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO₂, VOC or NO_x** emissions from each source in this permit. **For fee computation**, each **NSPS pollutant not listed above** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

END NOTES

- The permittee shall:**
- (1) Pay Title V **annual emission** fees, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of TAPCR 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
 - (2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).
 - (3) Sources paying annual emissions fees on an **actual emissions basis**: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.
 - (4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and

(c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary’s representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**.

For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).

- (5) When paying on an actual or mixed emissions basis, submit the actual emissions analyses at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(9)(g) and are dependent on the Responsible Official’s choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

Payment of the fee due and the actual emissions analysis (if required) shall be submitted to The Technical Secretary at the following address:

The Tennessee Department of Environment and Conservation
 Division of Fiscal Services
 Consolidated Fee Section – APC
 David Crockett Tower
 500 James Robertson Parkway, 6th Floor
 Nashville, Tennessee 37243

and

The Tennessee Department of Environment and Conservation
 Division of Air Pollution Control
 Emission Inventory Program
 David Crockett Tower
 500 James Robertson Parkway, 7th Floor
 Nashville, Tennessee 37243

or

An electronic copy (PDF) of actual emissions analysis can also be submitted to: apc.inventory@tn.gov

TAPCR 1200-03-26-.02 (3) and (9), and 1200-03-09-.02(11)(e)1 (iii) and (vii)

E2. Reporting requirements.

(a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from **October 1st to March 31st** and **April 1st to September 30th** and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. The first semiannual report following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
569269	April 1, 2024	day before new permit issuance (with year)
578338	Issuance Date of new permit (with year)	September 30, 2024

The semiannual reports for Title V permit #578338 shall include:

- (1) Any monitoring and recordkeeping required by **Conditions E4-1 and E4-2** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.

- (2) The visible emission evaluation readings from **Condition E3-5** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**. The record of deviations/excursions shall include, at a minimum, the time the deviation/excursion was discovered, the corrective action taken, and the time that the deviation/excursion was rectified.

These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

(b) **Annual compliance certification:** The permittee shall submit annually compliance certifications with the terms and conditions contained in Sections **A, B, D** and **E** of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (1) The identification of each term or condition of the permit that is the basis of the certification;
- (2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (3) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an *excursion or **exceedance as defined below occurred; and
- (4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* “Excursion” shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** “Exceedance” shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Annual compliance certifications shall cover the 12-month period from October 1st to September 30th and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
569269	October 1, 2023	day before new permit issuance (with year)
578338	Issuance Date of new permit (with year)	September 30, 2024

These certifications shall be submitted to: **TN APCD** and **EPA**

Columbia Environmental Field Office
Division of Air Pollution Control
1421 Hampshire Pike
Columbia, TN 38401
 or
APC.ColuEFO@tn.gov

and **Air Enforcement Branch**
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303
 or
Through the EPA CDX
(<https://cdx.epa.gov/>)

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667.
 TAPCR 1200-03-09-.02(11)(e)3.(v)

- (c) **Retention of Records** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or representative thereof.

TAPCR 1200-03-09-.02(11)(e)1.(iii)(II)II

E3. General Permit Requirements.

E3-1. Identification of Responsible Official and Technical Contact

- (a) The application that was utilized in the preparation of this permit is dated June 20, 2023, and is signed by Kris P. Foster, Environmental Health and Safety Lead of the permitted facility. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing (Attachment 4) and must be submitted within 30 days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.
- (b) The application that was utilized in the preparation of this permit is dated June 20, 2023, and identifies Kris P. Foster as the Principal Technical Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.
- (c) The application that was utilized in the preparation of this permit is dated June 20, 2023, and identifies Rhonda Gardner, as the Billing Contact for the permitted facility. If this person terminates his/her employment or is assigned different duties such that he/she is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

E3-2. Application and Agreement Letters

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application referenced in **Condition E3-1**, and any documented agreements made with the Technical Secretary.

TAPCR 1200-03-09-.01(1)(d)

E3-3. General Recordkeeping Requirements

- (a) All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

For Daily Recordkeeping	For Weekly Recordkeeping	For Monthly Recordkeeping
No later than seven days from the end of the day for which the data is required.	No later than seven days from the end of the week for which the data is required.	No later than 30 days from the end of the month for which the data is required.

- (b) The information contained in logs, records, and submittals required by this permit shall be kept at the facility's address, unless otherwise noted, and provided to the Technical Secretary or a Division representative upon request. Computer-generated logs are acceptable. Compliance is assured by retaining the logs, records, and submittals specified in this permit for a period of not less than five years at the facility's address.

TAPCR 1200-03-10-.02(2)(a)

E3-4. Routine Maintenance Requirements

The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

Compliance Method: Records of all repair and maintenance activities required above shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years. The date each maintenance and repair activity began shall be entered in the log no later than seven days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than seven days after activity completion.

E3-5. Visible and Fugitive Emissions

- (a) Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24-hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 (amended on September 11, 2013) that is enclosed as Attachment 1. Reports and certifications, if required, shall be submitted in accordance with **Condition E2** of this permit.

- (b) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions shall include, but are not limited to, the following:
- (i) Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
 - (ii) Application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can create airborne dusts;
 - (iii) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in TAPCR 1200-03-20. A malfunction is defined as, any sudden and unavoidable failure of process equipment or for a process to operate in an abnormal and unusual manner. Failures that are caused by poor maintenance, careless operation, or any other

preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

TAPCR 1200-03-08-.01(1) and 1200-03-08-.01(2)

Compliance Method: When required to demonstrate compliance, fugitive emissions shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

- (c) Fugitive emissions from roads and parking areas shall not exhibit greater than 10% opacity.

TAPCR 1200-03-08-.03

Compliance Method: When required to demonstrate compliance, fugitive emissions from roads and parking areas shall be determined by utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and August 24, 1984.

E3-6. Facility-wide Requirements/Limitations

The as-supplied VOC and HAP content of all VOC and HAP-containing materials (Including but not limited to coatings, inks, adhesives, thinners, and solvents) to be used by this source shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC and HAP content by weight. If new materials are used, or if material formulation is changed, logs used to calculate emissions of VOC and HAP shall be updated within 30 days from the initial date of usage of the new or altered material.

TAPCR 1200-03-09-.03(8) and TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Purchase orders and/or invoices for all VOC- and HAP-containing materials, along with current SDS, must be maintained and kept available for inspection by the Technical Secretary or a Division representative. The SDS must explicitly list the VOC and HAP content by weight for all VOC- and HAP-containing materials. If SDS are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records must be retained in accordance with **Condition E3-3**. In lieu of paper documents scanned documents (maintained electronically) may be used to fulfill this requirement.

TAPCR 1200-03-10-.02(2)(a)

- E3-7.** This source shall comply with all applicable state and federal air pollution regulations. This includes but is not limited to, federal regulations published under 40 CFR 63 for sources of hazardous air pollutants and 40 CFR 60, New Source Performance Standards. TAPCR 1200-03-09-.03(8)

- E3-8.** This source shall operate in accordance with the terms of this permit and the information submitted in the approved permit application. TAPCR 1200-03-09-.02(6)

E3-9. Accidental release plan.

In accordance with Section 112(r) of the Clean Air Act and 1200-03-32-.03(1) of Tennessee Air Pollution Control Regulations, the permittee has filed a copy of the accidental release plan for this facility. This plan has been filed with both EPA Region IV and the Tennessee Division of Air Pollution Control. The permittee shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. Such certification is due no later than January 31 for the preceding calendar year in accordance with 1200-03-32-.03(3) of TAPCR.

- E3-10.** The permittee is placed on notice that there is a National Emission Standard for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Production (40 CFR Part 63 Subpart III) for major sources. Should this facility reach or exceed the major source thresholds of 10 tons of a single HAP or 25 tons of a combination of HAPs, the facility shall notify the Division within three working days of discovery. Records as required by **Condition E4-2** may be used for this purpose.

E3-11. 40 CFR Part 63 Subpart OOOOOO - National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources

This source is subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart OOOOOO, National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources, including the General Provisions identified in Attachment 5. The following standards will apply to this source:

- (1) The permittee must not use a material containing methylene chloride as an equipment cleaner to flush the mixhead or use a material containing methylene chloride elsewhere as an equipment cleaner in a molded flexible polyurethane foam process.
- (2) The permittee must not use a mold release agent containing methylene chloride in a molded flexible polyurethane foam process.

40 CFR §63.11416(c) and TAPCR 1200-03-09-.03(8)

Compliance Method:

- (1) Compliance may be demonstrated using VOC containing material usage records, Safety Data Sheets (SDS), manufacturer's formulation data, and engineering calculations. The permittee shall maintain documentation used to demonstrate compliance in accordance with **Condition E3-3**.
- (2) The permittee shall keep a certification on file at the plant site that contains the following statements, and must be signed by a responsible official:
 - (i) "This facility does not use any equipment cleaner to flush the mixhead which contains methylene chloride, or any other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process in accordance with § 63.11416(c)(1)."
 - (ii) "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with § 63.11416(c)(2)."

40 CFR §63.11416(f), 40 CFR §63.11417(c), and TAPCR 1200-03-09-.03(8)

E4. Source Specific Emission Standards.

28-0076-01

Polyurethane Foam Production – Source consists of foam production lines where various mixtures of Polyol, Toluene Diisocyanate (TDI), and Diethanolamine (DEOA), are injected into molds to produce polyurethane foam for automotive seat cushions. Minor repairs are performed using Methylene Diphenyl Diisocyanate (MDI) as the foaming agent. (Area Source: NESHAP 40 CFR 63 Subpart OOOOOO, PSD/BACT)

E4-1. Particulate matter (PM) emitted from this source shall not exceed **3.00** lb./hr. on a daily average basis and **9.90** tons during any period of 12-consecutive months.

TAPCR 1200-03-07-.01(5) and the agreement letter dated July 18, 2022, from the permittee. (Attachment 2)

Compliance Method:

- (1) The permittee shall demonstrate compliance with the hourly PM emission limitation by calculating the actual PM emitted each hour, on a daily average basis, and maintain records of the emissions in the format in log 3 of Attachment 3, or an alternative format, which readily provides the same information. These logs shall be reported in accordance with **Condition E2** and retained in accordance with **Condition E3-3**.
- (2) The permittee shall demonstrate compliance with the annual PM emission limitation by calculating the actual PM emitted during each calendar month and each period of 12-consecutive months and maintain records of the emissions in the format in logs 4 and 5 of Attachment 3, or in an alternative format which readily provides the same information. These logs shall be reported in accordance with **Condition E2** and retained in accordance with **Condition E3-3**.

E4-2. Volatile organic compounds (VOC) emitted from this source shall not exceed **491.40** tons during any period of 12-consecutive months and shall utilize good work practice standards. This shall represent Best Available Control Technology (BACT) for this source.

TAPCR 1200-03-09-.01(4), TAPCR 1200-03-07-.07(2) and the agreement letter dated July 18, 2022, from the Permittee. (Attachment 2)

Compliance Method:

- (1) The permittee shall demonstrate compliance with the annual VOC limit by calculating actual emissions of VOCs and HAPs (using the emission factors below) emitted during each calendar month and each period of 12-consecutive months and maintain records of the emissions in the format found in logs 1 and 2 of Attachment 3, or in an alternative format which readily provides the same information. These logs shall be reported in accordance with **Condition E2** and retained in accordance with **Condition E3-3**.
 - Toluene Diisocyanate (TDI) emissions shall be calculated using the emission factor of **3.29×10^{-5}** lb. TDI emitted per lb. of TDI used. This emission factor is based on a source test performed on October 1, 1997.
 - Diethanolamine (DEOA) emissions shall be calculated using the emission factor of **7.94×10^{-6}** lb. DEOA emitted per lb. of DEOA used. This emission factor is based on a source test performed on October 1, 1997.
 - Methylene Diphenyl Diisocyanate (MDI) emissions shall be calculated using the emission factor of **9.39×10^{-6}** lb. MDI emitted per lb. of MDI used. This emission factor is based on a source test performed on October 1, 1997.
- (2) The permittee shall assure compliance with good work practice standards by conducting and recording the following work practice activities to ensure VOC emissions are minimized and reduced. These records shall be retained in accordance with **Condition G10**. These activities are outlined in Adient's ISO 14001 Environmental Management System (EMS) Policies as well as internal Standard Work Guidelines:
 - All VOC containing mold release containers shall remain closed until such time the container is in process of preparation for and ready to use.
 - Inventory storage of VOC containing mold release containers shall consist of a controlled access area complete with spill containment.
 - Mold release material shall be transferred from tank storage to end point discharge via fully contains and closed loop piping conveyance system.

- In the event of an inadvertent failure of the closed loop conveyance system resulting in the incidental release of mold release material, as referenced within Adient Pulaski's internal Plant Emergency Operations Plan, the onsite Spill Response Team shall be notified immediately and shall mitigate the spill in a manner which reduces potential fugitive VOC emissions.
- End point usage of VOC containing mold release material shall be monitored regularly as outlined within Adient Pulaski's internal work instructions and standard operating procedures.
- Utilizing the ISO14001 EMS Environmental Objectives Form, or the Adient continuous improvement platform, plant personnel shall participate in regular mold release tracking activities. These records shall be retained in accordance with **Condition E3-3**.

The above measures are instituted by way of the internal ISO program for continuous improvement and are collectively considered good management practices at the time of permit issuance. Improvements and the ongoing potential for continuous improvement may require updates of these procedures and environmental objectives. If Adient Pulaski revises the above measures, the permittee shall provide written notification to the Division at least 30 days prior to the change.

END OF TITLE V OPERATING PERMIT #578338

ATTACHMENT 1

**OPACITY MATRIX DECISION TREE for
VISIBLE EMISSION EVALUATION METHOD 9
dated June 18, 1996, and amended September 11, 2013**

Decision Tree PM for Opacity for Sources Utilizing EPA Method 9*

Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants
Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

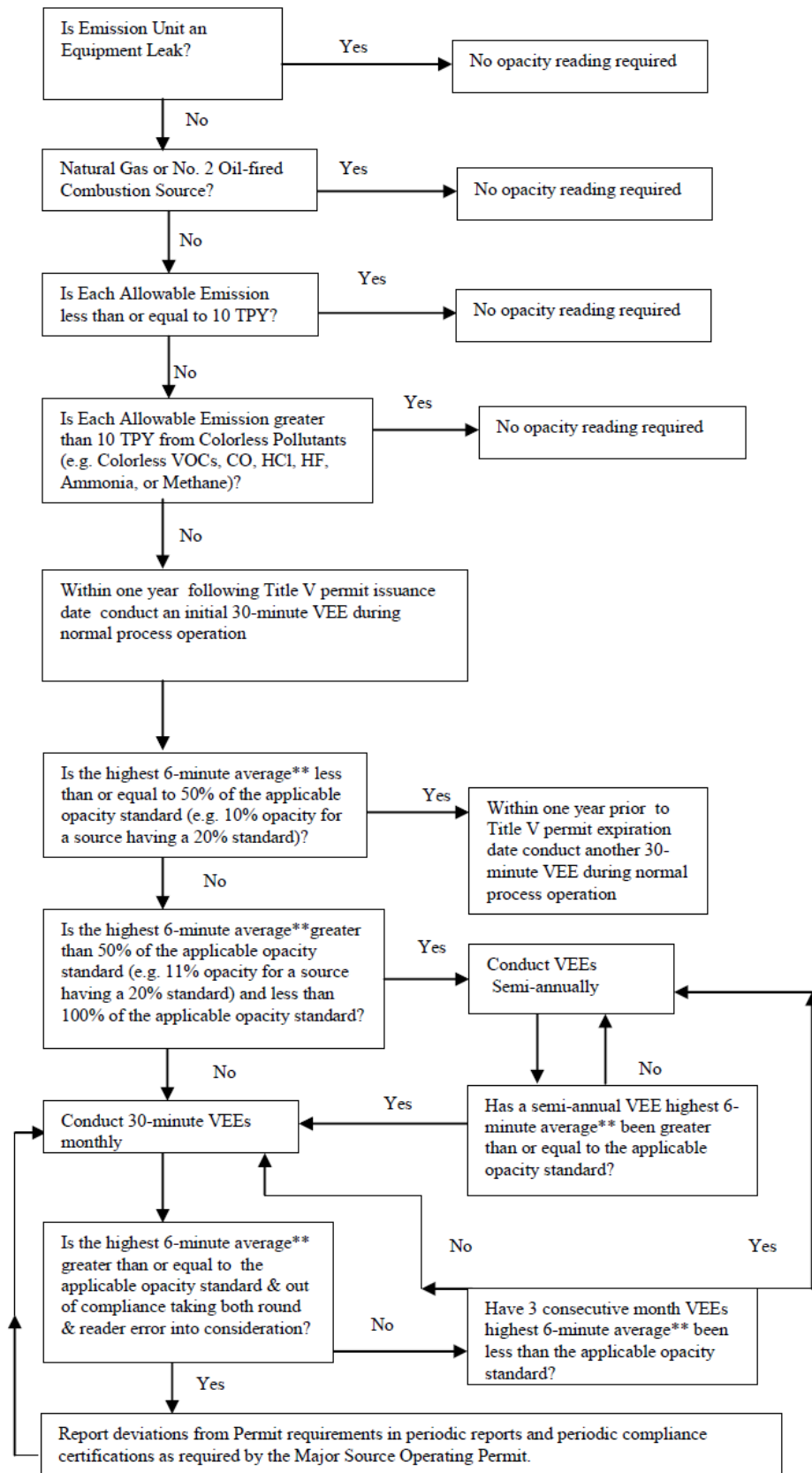
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards:
EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.

Dated June 18, 1996
Amended September 11, 2013



ATTACHMENT 2

**ADIENT US LLC AGREEMENT LETTER for
PARTICULATE MATTER AND VOLITILE ORGANIC COMPOUNDS**

Dated July 18, 2022

1890 Mines Road
 Pulaski, Tennessee 38478
 Tel 931.363.5666 Fax 931.424-6722



July 18, 2022

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

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 (PM₁₀) 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 ₁₀	9.9 tons per year and 3.0 pounds per hour

The annual VOC and PM₁₀ 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 PM₁₀ 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 PM₁₀ is 15 tons per year (tpy). Adient is proposing a maximum PM₁₀ emission rate of 9.9 tpy. Consequently, the SER will not be exceeded. In regard to the requirement to impose shorter term limits on PM₁₀ emissions, Adient proposes a limit on PM₁₀ 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 PM₁₀ emission rate of 3.0 lb/hour,

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the annual PM₁₀ emission rate would otherwise be greater than 9.9 tpy. A maximum emission rate of, or potential to emit (PTE) PM₁₀ 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 PM₁₀. However, Adient is voluntarily accepting an annual restriction/limit on PM₁₀ emissions of 9.9 tpy. The combination of the longer-term annual PM₁₀ emissions rate with the projected and slightly higher hourly equivalent PM₁₀ 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 PM₁₀; 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 PM10 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
	<p>(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 Condition E2 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.</p>	
E4-2	<p>Volatile organic compounds (VOC) emitted from this source shall not exceed 491.4 tons during all intervals of twelve (12) (MM1) consecutive months.</p> <p>Compliance Method: 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 Logs 1 and 2 of Condition E3-15 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 Condition E2 of this permit and be retained for a period of not less than five (5) years.</p> <ul style="list-style-type: none"> • Toluene Diisocyanate (TDI) emissions shall be calculated using the emission factor of 3.29 x 10⁻⁵ lb TDI emitted per lb of TDI used. This emission factor is based on a source test performed on October 1, 1997. • Diethanolamine (DEOA) emissions shall be calculated using the emission factor of 7.94 x 10⁻⁶ lb DEOA emitted per lb of DEOA used. This emission factor is based on a source test performed on October 1, 1997. • Methylene Diphenyl Diisocyanate (MDI) emissions shall be calculated using the emission factor of 9.39 x 10⁻⁶ lb MDI emitted per lb of MDI used. This emission factor is based on a source test performed on October 1, 1997. 	TAPCR 1200-03-07-.07(2)
New permit condition	The permittee shall calculate the actual quantities of PM ₁₀ 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 ₁₀ emitted from this facility during	TBD

Page 4 of 4

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

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ATTACHMENT 3

**EXAMPLE LOGS 1 through 5 for
PARTICULATE MATTER and VOLITILE ORGANIC COMPOUNDS**

LOG 1 MONTHLY LOG FOR {28-0076-01}

MONTH: _____

YEAR: _____

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)	TDI EMITTED (tons/month)	DEOA EMISSION FACTOR (7.94x10 ⁻⁶ lb/lb)	DEOA EMITTED (tons/month)	MDI EMISSION FACTOR (9.39x10 ⁻⁶ lb/lb)	MDI EMITTED (tons/month)	TOTAL HAPs EMITTED (tons/month)
TOTALS											

LOG 2 12-MONTH -LOG FOR {28-0076-01}

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)
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										

(*) The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this Table, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months].

LOG 3 DAILY PM LOG FOR {28-0076-01} Month: _____ Year: _____

DAY	MATERIAL USAGE (lbs.)	PARTICULATE CONTENT (wt %)	TRANSFER EFFICIENCY (55%)	HOURS OF OPERATION	*DAILY AVERAGE PM EMITTED (lbs./hr.)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					

*Daily average PM emitted (lb/hr) = material usage (lbs) x particulate content (wt %) x (1- transfer efficiency (55%)) / hours of operation

LOG 5 12-MONTH -PM LOG FOR {28-0076-01}

MONTH/YEAR	PM EMISSIONS (TONS per MONTH)	*TOTAL PM EMISSIONS (TONS per 12 CONSECUTIVE MONTHS)
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		

(*) The Tons per 12-consecutive Month value is the sum of the PM emissions in the 11 months preceding the month just completed + the PM emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this Table, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months].

ATTACHMENT 4

NOTIFICATION of CHANGES in
RESPONSIBLE OFFICIAL, SOURCE, AND OWNERSHIP FORMS

Notification of Changes

Facility (Permittee): _____ Adient US LLC _____

Facility ID: _____ 28-0076 _____

Source Number: _____

	Control Equipment	Stack Height (Feet)	Stack Diameter (Feet)	Exit Velocity (Feet/Second)	Exit Temperature (°F)
Current					
Proposed					
Current					
Proposed					
Current					
Proposed					

Comments:

As the Responsible Person of the above-mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Notification of Ownership Change

Facility (Permittee): _____ Adient US LLC _____ (Previous Owner)

Facility ID: _____ 28-0076 _____

Facility (Permittee): _____ (New Owner)

Email Address: _____

Secretary of State Control Number: _____ [as registered with the TN Secretary of State]

Date of Ownership Change: _____

Comments:

As the responsible person for the new owner or operator of the above-mentioned facility (permittee):

- I agree to not make any changes to the stationary source(s) that meet the definition of modification as defined in Division 1200-03 or Division 0400-30¹, and
- I agree to comply with the conditions contained in **the permits listed below**, Division 1200-03 and Division 0400-30 of the Tennessee Air Pollution Control Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

List all active permits issued to the facility for which the owner wishes to assume ownership:

As the Responsible Person of the above-mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

¹ Appropriate application forms must be submitted prior to modification of the stationary source(s).

ATTACHMENT 5

GENERAL PROVISIONS for

40 CFR 63 SUBPART 000000

General Provisions for 40 CFR Part 63, Subpart OOOOOO

You are required to comply with the following General Provisions of the federal National Emission Standards for Hazardous Air Pollutants (NESHAP):

General Provisions Citation 40 CFR	Subject of Citation	Applies to Subpart	Explanation
§63.1	Applicability	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.2	Definitions	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Definitions are modified and supplemented by §63.11419.
§63.3	Units and Abbreviations	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.4	Prohibited Activities and Circumvention	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.5	Preconstruction Review and Notification Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.6(a), (b), (c), (d)	Compliance with Standards and Maintenance Requirements— Applicability Compliance Dates	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.6(e)(1)-(2)	Operation and Maintenance Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.6(e)(3)	Operation and Maintenance Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Owners and operators of subpart OOOOOO affected sources are not required to develop and implement a startup, shutdown, and malfunction plan.
§63.6(f)- (g)	Compliance with Non-opacity Emission Standards	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.6 (h)	Compliance with Non-opacity Emission Standards	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Subpart OOOOOO does not require opacity and visible emissions standards.
§63.6(i)- (j)	Compliance with Non-opacity Emission Standards	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.7	Performance Testing Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Performance tests not required by subpart OOOOOO
§63.8	Monitoring Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Continuous monitoring, as defined in subpart A, is not required by subpart OOOOOO
§63.9(a)-(d)	Notification Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.9(e)-(g)	Notification Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.9(h)	Notification Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Subpart OOOOOO specifies Notification of Compliance Status requirements.

§63.9(i)-(j)	Notification Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.10(a)-(b)	Recordkeeping and Reporting Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Subpart OOOOOO specifies Recordkeeping and Reporting requirements.
§63.10(c)	Recordkeeping and Reporting Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.10(d)(1)	Recordkeeping and Reporting Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.10(d)(2)-(3)	Recordkeeping and Reporting Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.10(d)(4)	Recordkeeping and Reporting Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.10(d)(5)	Recordkeeping and Reporting Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.10(e)	Recordkeeping and Reporting Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.10(f)	Recordkeeping and Reporting Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.11	Control Device Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.12	State Authorities and Delegations	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.13	Addresses	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.14	Incorporations by Reference	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.15	Availability of Information and Confidentiality	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.16	Performance Track Provisions	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

TAPCR 1200-03-09-.03(8)

ATTACHMENT 6

TITLE V FEE SELECTION FORM APC 36 (CN-1583)



TITLE V FEE SELECTION

Type or print and submit to the email address above.

FACILITY INFORMATION

1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]

2. Site name (if different from legal name)

3. Site address (St./Rd./Hwy.)

County name

City

Zip code

4. Emission source reference number

5. Title V permit number

FEE SELECTION

This fee selection is effective beginning January 1, _____. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.

6. Payment Schedule (choose one):

Calendar Year Basis (January 1 – December 31)

Fiscal Year Basis (July 1 – June 30)

7. Payment Basis (choose one):

Actual Emissions Basis Allowable Emissions Basis Combination of Actual and Allowable Emissions Basis

8. If Payment Basis is "Actual Emissions" or "Combination of Actual and Allowable Emissions", complete the following table for each permitted source and each pollutant for which fees are due for that source. See instructions for further details.

Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit.
			If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.

TITLE V PERMIT STATEMENT - RENEWAL

Facility Name:	Adient US LLC
City:	Pulaski
County:	Giles

Date Application Received:	June 11, 2020, revised June 20, 2023
Date Application Deemed Complete:	June 20, 2023

Emission Source Reference No.:	28-0076-01
Permit No.:	578338

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-3-9-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to Adient US LLC and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

PSD - Prevention of Significant Deterioration
NESHAP - National Emission Standards for Hazardous Air Pollutants
NSPS - New Source Performance Standards
MACT - Maximum Achievable Control Technology
NSR - New Source Review

I. Identification Information

A. Source Description

This facility manufactures automotive seat cushions made from polyurethane foam. The following source exists at the facility:

Emission Source Number	Description
28-0076-01	Polyurethane Foam Manufacturing

B. Facility Classification

1. Attainment or Nonattainment Area Location: The facility is located in a non-attainment area.
2. Company is located in a Class II area. (This means that the facility is not located within a national park or national wilderness area; see 40 CFR 52.21(e) for complete definition.)

C. Regulatory Status

1. PSD/NSR: This facility is a major source under PSD.
2. Title V Major Source Status by Pollutant:

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source	Non-Major Source
PM	Yes	No	Yes
PM ₁₀	Yes	No	Yes
SO ₂	No	No	Yes
VOC	Yes	Yes	No
NO _x	No	No	Yes
CO	No	No	Yes
Individual HAP	Yes	No	Yes
Total HAPs	Yes	No	Yes

3. MACT Standards for Sources contained in this Title V Application: This facility is an area source for HAPs and is subject to a final MACT Standard.

MACT Subpart	Rule
OOOOOO	National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources

4. Program Applicability: Are the following programs applicable to the facility?
PSD (yes)
NESHAP (yes)
NSPS (no)

I. Compliance Status

- A. Is this portion of the facility currently in compliance with all applicable requirements? Yes
- B. Are there any applicable requirements that will become effective during the permit term? no

III. Other Requirements

- A. Emissions Trading: The facility is not involved in an emissions trading program.
- B. Acid Rain Requirements: This facility is not subject to any requirements in Title IV of the Clean Air Act.

- C. Prevention of Accidental Releases: This source is subject to 40 CFR Part 68 as of June 21, 1999.
- D. CAM Plan: This facility is not currently subject to regulations under 40 CFR part 64 (Compliance Assurance Monitoring).

IV. Public Participation Procedures

Notification of this draft permit was mailed to the following environmental agencies:

- 1. EPA – Region IV
- 2. Alabama Department of Environmental Management
- 3. Columbia Environmental Field Office

ADDENDUM TO TITLE V PERMIT STATEMENT: PUBLIC COMMENTS

Company Name:	Adient US LLC
City:	Pulaski
County:	Giles

Date Application Received:	June 11, 2020, revised June 20, 2023
Date Application Deemed Complete:	June 20, 2023

Emission Source Reference No.:	28-0076-01
Permit No.:	578338

Public Notice Date	May 16, 2024
Public Hearing Date	TBD
EPA Comments:	TBD