

April 24, 2026

Mr. Michael Kennedy
Manager, Permit Review Branch
Division for Air Quality
Kentucky Department for Environmental Protection
200 Fair Oaks Lane, 1st Floor
Frankfort, Kentucky 40601

Re: Title V Operating Permit Renewal Application
Adient US LLC
824 Lemons Mill Road
Georgetown, KY 40324
Permit Number V-15-057 R2
Source ID: 21-209-00020

Adient Georgetown
824 Lemons Mill Road
Georgetown KY 40324
502-863-0400
adient.com

Dear Mr. Kennedy:

The Adient US LLC facility in Georgetown is currently operating under Title V Operating Permit V-15-057 R2. We are submitting this application for renewal with only minor (insignificant) changes to the site.

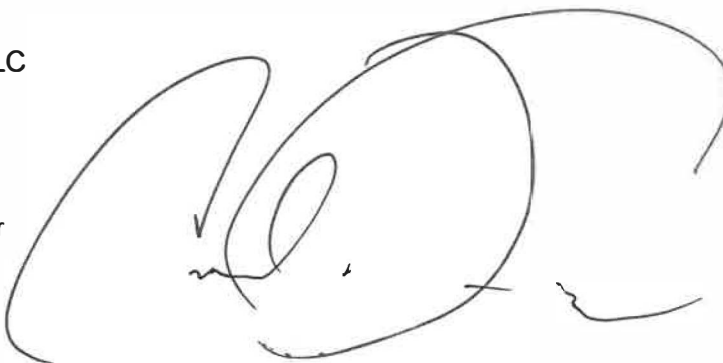
A review of the emission units and materials consumed at this facility has identified no new applicable regulations or any significant change in the composition in emissions from the operations conducted. The only change of note is the addition of one insignificant activity not currently included in the Title V permit. As such, the renewal application attached to this letter consists only of Form DEP7007AI and a supplement to the previously submitted Form DEP7007DD to include the new insignificant activity.

Should you have any questions or require additional information regarding this renewal application, please contact me at 502-867-6814.

Sincerely,
Adient US LLC

Carl German
Plant Manager

Attachment

A large, stylized handwritten signature in black ink, likely belonging to Carl German, the Plant Manager. The signature is fluid and cursive, with a prominent loop at the end.

Air Emissions Basis for Permitting and Reporting

Largely, air emissions are tracked and reported based upon a mass balance approach using the material formulation data, and the dispensed quantity used. The calculations are performed for a calendar day and are used to determine emissions on both a calendar month sum and 12-month rolling sum basis. We are providing a summary by air emissions category with details below.

VOCs

VOCs are primarily emitted from the foam line from the utilization of mold release wax (for example spray wax). The wax is applied to the mold surface (for example spray application) prior to foam injection. The mold release wax/agent prevents the reacted foam product from sticking to the mold for ease of extraction and to prevent tears in the foam surface.

The VOC emissions rate is quantified using:

- 1) Material formulation data from the manufacturer
- 2) The quantity of material (wax) used (consumed) (for example pounds consumed on a daily basis)
- 3) A mass balance summary of VOC content (% wt.) times the mass consumed. It is assumed that all (100%) of the VOCs in the mold release agents are emitted when used.

Example calculation:

$$\text{Daily wax usage (lbs.)} \times \% \text{ wt. VOC} = \text{Pounds of VOC per day}$$

The foam materials are moisture cured, reactive two-component systems with very low (if any) VOC losses. Tank storage and usages volumes of the unreacted components have very low vapor pressures and emissions calculations using the EPA TANKS program indicate insignificant VOC emissions on an annual basis (typically in the range of single to tens of pounds per year). VOC losses/emissions from the foam components and reactions are therefore considered insignificant sources of VOCs.

HAPs

The only material identified as a HAP at this location are the isocyanates contained in the foam components. The isocyanate HAP quantities have been estimated to have extremely low air emissions rates (a few pounds per year) on the following basis:

- 1) The isocyanate components have very low vapor pressures and thus are not observed to evaporate when used.
- 2) The isocyanate family of compounds (isomers) utilized are reactive components in the foam ingredients that when reacted with moisture form the polymeric foam substrate. It

has been found the reactants are either totally consumed in the foam reaction or largely locked into the matrix of foam product.

- 3) Formulation and proper mixing of the foam components is critical to good part production. Improper mixing results in a failed part and thus proper mixing is critical to satisfactory foam unit production operations, minimizing air contact with improperly reacted isomers.
- 4) The isocyanate reactive components are formulated in the foam raw material and are typically pre-catalyzed, which means excess reactive isomer components are not needed or desirable to get a good foam part.

Particulates

For the foam production operation, particulate emissions are tabulated based on an emissions factor for the spray application at a unit transfer efficiency of 60% times the mass of solids sprayed for that day. This calculation greatly over estimates particulate emissions (overspray) since it assumes;

- That all solids in the wax used on a given day are sprayed and become airborne.
- 100% of the overspray wax is collected and directed to the outer air via the production vents at the spray application stations located at each foam production line
- Does not consider removal or filtration at the spray station
- That all particulate matter (PM_{total}) is the Part 70 regulated pollutant and not just those particles that are 10 microns and smaller (PM_{10}). [$PM_{total} = PM_{10} = PM_{2.5}$]
- These factors in combination result in an over estimate and reporting of particulate emissions.

The particulate matter emissions rate is quantified using:

- 1) Solids content from the material formulation data supplied by the manufacturer
- 2) The quantity of material (wax) used (consumed) (for example pounds of wax consumed on a daily basis)
- 3) A mass balance summary of solids content (%wt) times the mass consumed. It is assumed that 40% (100% minus 60% transfer efficiency = 40% PM emissions rate) of the mass solids content in the mold release agents are emitted when used.

Example calculation:

Daily wax usage (lbs.) x % wt. solids = Pounds of solids sprayed

Pounds of solids sprayed x (1 – % transfer efficiency) = pounds of solids emitted/day

$\frac{\text{Pounds of solids per day}}{\text{Run hours per day}} = \text{Pounds of PM emitted per hour}$

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007AI

Administrative Information

- ___ Section AI.1: Source Information
___ Section AI.2: Applicant Information
___ Section AI.3: Owner Information
___ Section AI.4: Type of Application
___ Section AI.5: Other Required Information
___ Section AI.6: Signature Block
___ Section AI.7: Notes, Comments, and Explanations

Additional Documentation

___ Additional Documentation attached

Source Name:

Adient US LLC - Georgetown Plant

KY EIS (AFS) #:

21 - 209-00020

Permit #:

V-15-057 R2

Agency Interest (AI) ID:

3911

Date:

April 24, 2026

Section AI.1: Source Information

Physical Location Address:

824 Lemons Mill Road

City:

Georgetown

County:

Scott

Zip Code:

40324

Mailing Address:

824 Lemons Mill Road

P.O. Box:

Georgetown

City:

Georgetown

State:

Kentucky

Zip Code:

40324

Standard Coordinates for Source Physical Location

Longitude:

38.20055556

(decimal degrees)

Latitude:

84.53916667

(decimal degrees)

Primary (NAICS) Category:

Motor Vehicle Seating and
Interior Trim Manufacturing

Primary NAICS #:

336360

Classification (SIC) Category:		Motor Vehicle Parts and Accessories		Primary SIC #: 3714	
Briefly discuss the type of business conducted at this site: Automotive seating production.					
Description of Area Surrounding Source: ☐ Rural Area ☐ Urban Area		☒ Industrial Park ☐ Industrial Area ☐ Residential Area ☐ Commercial Area		Is any part of the source located on federal land? ☐ Yes ☒ No	
Approximate distance to nearest residence or commercial property: 0.1 mile		Property Area: 134.15 acres		Is this source portable? ☐ Yes ☒ No	
What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?					
NPDES/KPDES: ☒ Currently Hold ☐ Need ☐ N/A					
Solid Waste: ☐ Currently Hold ☐ Need ☒ N/A					
RCRA: ☒ Currently Hold ☐ Need ☐ N/A					
UST: ☐ Currently Hold ☐ Need ☒ N/A					
Type of Regulated Waste Activity: ☐ Mixed Waste Generator ☒ Generator ☐ Recycler ☐ Other: _____ ☐ U.S. Importer of Hazardous Waste ☐ Transporter ☐ Treatment/Storage/Disposal Facility ☐ N/A					
Number of Employees:		455			

Section AI.2: Applicant Information**Applicant Name:** Adient US, LLC - Georgetown Plant**Title:** (if individual)**Mailing Address:**
Street or P.O. Box: 824 Lemons Mill Road
City: Georgetown State: KY Zip Code: 40324**Email:** (if individual)**Phone:****Technical Contact****Name:** Ricki Palmer**Title:** Regional EHS Manager**Mailing Address:**
Street or P.O. Box: 824 Lemons Mill Road

City: Georgetown State: KY Zip Code: 40324

Email: ricki.h.palmer@adient.com**Phone:** 502-509-1953**Air Permit Contact for Source****Name:** Ricki Palmer**Title:** Regional EHS Manager**Mailing Address:**
Street or P.O. Box: 824 Lemons Mill Road
City: Georgetown State: KY Zip Code: 40324**Email:** ricki.h.palmer@adient.com**Phone:** 502-509-1953

Section A1.3: Owner Information

☐ Owner same as applicant

Name: Adient
Title: _____
Mailing Address: Street or P.O. Box: 49200 Halyard Drive
City: Plymouth State: MI Zip Code: 48170
Email: ricki.h.palmer@adient.com
Phone: 859-509-1953

List names of owners and officers of the company who have an interest in the company of 5% or more.

Name	Position
_____	_____
_____	_____
_____	_____

Section A1.4: Type of Application**Current Status:**
☒ Title V ☐ Conditional Major ☐ State-Origin ☐ General Permit ☐ Registration ☐ None
Requested Action:*(check all that apply)*
☐ Name Change ☐ Initial Registration ☐ Significant Revision ☐ Administrative Permit Amendment
☒ Renewal Permit ☐ Revised Registration ☐ Minor Revision ☐ Initial Source-wide Operating Permit
☐ 502(b)(10)Change ☐ Extension Request ☐ Addition of New Facility ☐ Portable Plant Relocation Notice
☐ Revision ☐ Off Permit Change ☐ Landfill Alternate Compliance Submittal ☐ Modification of Existing Facilities
☐ Ownership Change ☐ Closure
Requested Status:
☒ Title V ☐ Conditional Major ☐ State-Origin ☐ PSD ☐ NSR ☐ Other: _____
Is the source requesting a limitation of potential emissions?
☐ Yes ☒ No
Pollutant:**Requested Limit:****Pollutant:****Requested Limit:**

☐ Particulate Matter	_____	☐ Single HAP	_____
☐ Volatile Organic Compounds (VOC)	_____	☐ Combined HAPs	_____
☐ Carbon Monoxide	_____	☐ Air Toxics (40 CFR 68, Subpart F)	_____
☐ Nitrogen Oxides	_____	☐ Carbon Dioxide	_____
☐ Sulfur Dioxide	_____	☐ Greenhouse Gases (GHG)	_____
☐ Lead	_____	☐ Other	_____

For New Construction:**Proposed Start Date of Construction:***(MM/YYYY)***Proposed Operation Start-Up Date:** *(MM/YYYY)***For Modifications:****Proposed Start Date of Modification:***(MM/YYYY)***Proposed Operation Start-Up Date:** *(MM/YYYY)***Applicant is seeking coverage under a permit shield.**
☒ Yes ☐ No

Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.

Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

- | | |
|--|--|
| ☐ DEP7007A Indirect Heat Exchangers and Turbines | ☐ DEP7007CC Compliance Certification |
| ☐ DEP7007B Manufacturing or Processing Operations | ☒ DEP7007DD Insignificant Activities |
| ☐ DEP7007C Incinerators and Waste Burners | ☐ DEP7007EE Internal Combustion Engines |
| ☐ DEP7007F Episode Standby Plan | ☐ DEP7007FF Secondary Aluminum Processing |
| ☐ DEP7007J Volatile Liquid Storage | ☐ DEP7007GG Control Equipment |
| ☐ DEP7007K Surface Coating or Printing Operations | ☐ DEP7007HH Haul Roads |
| ☐ DEP7007L Mineral Processes | ☐ Confidentiality Claim |
| ☐ DEP7007M Metal Cleaning Degreasers | ☐ Ownership Change Form |
| ☐ DEP7007N Source Emissions Profile | ☐ Secretary of State Certificate |
| ☐ DEP7007P Perchloroethylene Dry Cleaning Systems | ☐ Flowcharts or diagrams depicting process |
| ☐ DEP7007R Emission Offset Credit | ☐ Digital Line Graphs (DLG) files of buildings, roads, etc. |
| ☐ DEP7007S Service Stations | ☐ Site Map |
| ☐ DEP7007T Metal Plating and Surface Treatment Operations | ☐ Map or drawing depicting location of facility |
| ☐ DEP7007V Applicable Requirements and Compliance Activities | ☐ Safety Data Sheet (SDS) |
| ☐ DEP7007Y Good Engineering Practice and Stack Height Determination | ☐ Emergency Response Plan |
| ☐ DEP7007AA Compliance Schedule for Non-complying Emission Units | ☐ Other: _____ |
| ☐ DEP7007BB Certified Progress Report | |

Section AI.6: Signature Block

I, the undersigned, hereby certify under penalty of law, that I am a responsible official*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.

Authorized Signature

Carl German

Type or Printed Name of Signatory

*Responsible official as defined by 401 KAR 52:001.

Date

Plant Manager

Title of Signatory

Section AL.7: Notes, Comments, and Explanations

Division for Air Quality
300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007DD

Insignificant Activities

___ Section DD.1: Table of Insignificant Activities
___ Section DD.2: Signature Block
___ Section DD.3: Notes, Comments, and Explanations

Source Name: Adient US LLC

KY EIS (AFS) #: 21- 209-00020

Permit #: V-15-057 R2

Agency Interest (AI) ID: 3911

Date: August 10, 2020

Section DD.1: Table of Insignificant Activities

*Identify each activity with a unique Insignificant Activity number (IA #); for example: 1, 2, 3... etc.

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions
18	Natural gas-fired dryer, 165,000 Btu/hr	UniLine UT75	None	Potential to emit for all criteria pollutants <0.1 ton/yr

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions

Section DD.2: Signature Block

I, THE UNDERSIGNED, HEREBY CERTIFY UNDER PENALTY OF LAW, THAT I AM A RESPONSIBLE OFFICIAL, AND THAT I HAVE PERSONALLY EXAMINED, AND AM FAMILIAR WITH, THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ITS ATTACHMENTS. BASED ON MY INQUIRY OF THOSE INDIVIDUALS WITH PRIMARY RESPONSIBILITY FOR OBTAINING THE INFORMATION, I CERTIFY THAT THE INFORMATION IS ON KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE OR INCOMPLETE INFORMATION, INCLUDING THE POSSIBILITY OF FINE OR IMPRISONMENT.

By:

Authorized Signature

Date

Carl German

Plant Manager

Type/Print Name of Signatory

Title of Signatory

Section DD.3: Notes, Comments, and Explanations

This form is being submitted to supplement the previously submitted Form 7007DD to add one insignificant activity tha has been installed since the
previous permit renewal. The 17 insignificant activities in the current Title V permit remain in operation.

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007N

Source Emissions Profile

___ Section N.1: Emission Summary
___ Section N.2: Stack Information
___ Section N.3: Fugitive Information
___ Section N.4: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI

Source Name: Adient Georgetown Facility

KY EIS (AFS) #: 21- 209-00020

Permit #: V-15-057 R3

Agency Interest (AI) ID: 3911

Date: 24-Apr-26

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)
	Roof Top Unit	RTU1	Space heaters	N.A.	N.A.		0.40	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU2	Space heaters	N.A.	N.A.		0.40	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU3	Space heaters	N.A.	N.A.		0.06	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU4	Space heaters	N.A.	N.A.		0.78	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU5	Space heaters	N.A.	N.A.		0.78	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU6	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU7	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU8	Space heaters	N.A.	N.A.		0.24	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU9	Space heaters	N.A.	N.A.		0.78	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU10	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU11	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Hourly Emissions		Annual Emissions
												Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	
	Roof Top Unit	RTU12	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU13	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU14	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU15	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU16	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU17	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU18	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Roof Top Unit	RTU19	Space heaters	N.A.	N.A.		0.27	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Makeup Air Unit	MAU1	Space heaters	N.A.	N.A.		0.50	Not an affected unit	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	Makeup Air Unit	MAU2	Space heaters	N.A.	N.A.		3.24	Particulate	0.01	AP-42	N.A.	0.03	N.A.	0.07
	Makeup Air Unit	MAU2	Space heaters	N.A.	N.A.		3.24	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.00
	Makeup Air Unit	MAU3	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14
	Makeup Air Unit	MAU3	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Makeup Air Unit	MAU4	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14
	Makeup Air Unit	MAU4	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Makeup Air Unit	MAU5	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14
	Makeup Air Unit	MAU5	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Makeup Air Unit	MAU6	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14
	Makeup Air Unit	MAU6	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Makeup Air Unit	MAU7	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14
	Makeup Air Unit	MAU7	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Makeup Air Unit	MAU8	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14

Emission Unit #	Emission Unit Name		Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Hourly Emissions		Annual Emissions
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	
	Makeup Air Unit		MAU8	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Makeup Air Unit		MAU9	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14
	Makeup Air Unit		MAU9	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Makeup Air Unit		MAU10	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14
	Makeup Air Unit		MAU10	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Makeup Air Unit		MAU11	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14
	Makeup Air Unit		MAU11	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Makeup Air Unit		MAU12	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14
	Makeup Air Unit		MAU12	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Makeup Air Unit		MAU13	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14
	Makeup Air Unit		MAU13	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Makeup Air Unit		MAU14	Space heaters	N.A.	N.A.		6.48	Particulate	0.01	AP-42	N.A.	0.06	N.A.	0.14
	Makeup Air Unit		MAU14	Space heaters	N.A.	N.A.		6.48	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.01
	Emergency Fire Tank Boiler		Boiler 1	Back-up fire water tank heater	N.A.	N.A.		1.20	Particulate	0.01	AP-42	N.A.	0.01	N.A.	0.03
	Emergency Fire Tank Boiler		Boiler 1	Back-up fire water tank heater	N.A.	N.A.		1.20	Sulfur Dioxide	5.88E-04	AP-42	N.A.	0.00	N.A.	0.00

[illegible]

missions	
Controlled Potential (tons/yr)	
N.A.	
N.A.	
N.A.	
N.A.	
N.A.	
N.A.	
N.A.	
N.A.	
N.A.	
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N.A.	

missions
Controlled Potential (tons/yr)
N.A.
N.A.
N.A.
N.A.
N.A.
N.A.
N.A.
N.A.
N.A.
N.A.
N.A.
N.A.
N.A.
N.A.

UTM Zone:

[illegible]

Section N.3: Fugitive Information

UTM Zone:

Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
Not Applicable								

Section N.4: Notes, Comments, and Explanations

All units describe on N1 are for comfort heating only - no process heat is derived from these units. All units fire using pipeline grade natural gas and all emissions factors are from EPA publication AP-42, fifth edition. All units have potential emissions will below 1 ton per year for the specified pollutant.

Freeman, Colby (EEC)

From: Ricki H Palmer <ricki.h.palmer@adient.com>
Sent: Monday, June 15, 2026 2:23 PM
To: Freeman, Colby (EEC)
Cc: Harley, Brian (EEC); Michelle Howard; Jeff Pfost; Trevor Campbell
Subject: RE: AI 3911 - Adient US LLC - Responsible Official Delegation Request

This Message Originated from Outside the Organization

This Message Is From an External Sender.

[Report Suspicious](#)

Hello Colby, Carl German is the plant manager and is the person who performs similar policy or decision-making functions for the corporation and is the sole duly authorized representative of this location at Adient Georgetown.

Stay Safe & Thank you,

Rick Palmer
Regional EHS Manager – Team SLED Captain
Foam EHS SME
NA Sustainability Lead

Adient US, LLC
Tel: 502-867-6814
24 hr Cell: 859-509-1953
Fax: 502-863-9507

Email Ricki.h.palmer@adient.com
<http://www.adient.com/>



My Personal Safety Commitment:

"I will set a good example through my actions and behaviors"

FY26 One Team, One Goal!! Suck Less Every Day (SLED)



From: Freeman, Colby (EEC) <colby.freeman@ky.gov>
Sent: Monday, June 15, 2026 2:14 PM
To: Ricki H Palmer <ricki.h.palmer@adient.com>
Cc: Harley, Brian (EEC) <Brian.Harley@ky.gov>
Subject: AI 3911 - Adient US LLC - Responsible Official Delegation Request

Good afternoon,

I am with the Kentucky Division for Air Quality, and I will be reviewing the Title V Renewal application for Adient US LLC in Georgetown. In reviewing the application, I see the DEP7007AI form was signed by Carl German, with the title Plant Manager. I need to confirm whether or not Mr. German has been delegated as a "Responsible Official" or if he qualifies automatically.

I have included the definition of "Responsible Official" below, as well as guidance on what action is needed to confirm.

"Responsible official" means:

(a) For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of that person if the representative is responsible for the overall operation of one (1) or more manufacturing, production, or operating facilities applying for or subject to a permit; and

1. The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25,000,000 in second quarter 1980 dollars; or

2. The delegation of authority to the representative is approved in advance by the cabinet pursuant to this subsection;

(b) For a partnership or sole proprietorship, a general partner or the proprietor, respectively;

(c) For a municipality, state, federal, or other public agency, a principal executive officer or ranking elected official. The principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operation of a principal geographic unit of Legislative Research Commission PDF Version Page: 21 the agency; or

(d) For the acid rain portion of a permit for an affected source, the designated representative.

It appears Mr. German does not appear to meet the requirements of the portion of the definition highlighted in yellow, unless he "performs similar policy or decision-making functions" for Adient US LLC. If that is the case, I will simply need a response to this email confirming that.

If he meets the portion of the definition highlighted in green, I will need a letter designating him as the Responsible Official that is signed by someone that meets the yellow highlighted portion.

Please let me know if you have any questions. Thanks,

Colby Freeman

Environmental Engineer Technologist I
Chemical Section
Division for Air Quality
300 Sower Blvd
Frankfort, KY 40601
(502) 782 - 1467

Adient – INTERNAL