

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-07900072-2019**
Application Received: **March 26, 2018**
Plant Identification Number: **07900072**
Permittee: **Toyota Motor Manufacturing West Virginia**
Facility Name: **Buffalo Plant**
Mailing Address: **1 Sugar Maple Lane, P.O. Box 600, Buffalo, WV 25033**

Physical Location: Buffalo, Putnam County, West Virginia
UTM Coordinates: 413.518 km Easting • 4,272.153 km Northing • Zone 17
Directions: The facility lies directly east of WV State Route 62 approximately one (1.0) mile south of Buffalo, WV.

Facility Description

Toyota Motor Manufacturing West Virginia (TMMWV) is primarily engaged in the manufacturing of automotive engines and automotive transmissions. As part of this manufacturing process, the plant contains machining, assembly, engine testing, and support operations. To support these operations, the plant is equipped with heating ventilation and air conditioning units, as well as various storage tanks (e.g., gasoline, motor oil, etc.). The SIC code for this facility is 3714.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2017 Actual Emissions
Carbon Monoxide (CO)	145.98	26.29
Nitrogen Oxides (NO _x)	89.83	11.04

Plantwide Emissions Summary [Tons per Year]

Regulated Pollutants	Potential Emissions	2017 Actual Emissions
Particulate Matter (PM _{2.5})	70.48	9.90
Particulate Matter (PM ₁₀)	70.48	22.44
Total Particulate Matter (TSP)	70.48	22.44
Sulfur Dioxide (SO ₂)	3.71	0.01
Volatile Organic Compounds (VOC)	249.43	82.41

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2017 Actual Emissions
VOC HAPs	0.49	0.09
PM HAPs	0.46	0.02
Total HAPs	0.95	0.11

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 145.98 TPY of CO and 249.43 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Toyota Motor Manufacturing West Virginia is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent And Control Particulate Air Pollution from Combustion Of Fuel In Indirect Heat Exchangers.
	45CSR6	Open burning prohibited.
	45CSR7	Particulate air pollution from manufacturing.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR Permits.
	45CSR16	Standards of Performance for New Stationary Sources.
	45CSR§21-19	To Prevent And Control Air Pollution from The Emission Of Volatile Organic Compounds - Coating of Miscellaneous Metal Parts.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.

	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR§21-40	To Prevent And Control Air Pollution from The Emission Of Volatile Organic Compounds - Other Facilities that Emit Volatile Organic Compound (VOC).

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2062M	October 12, 2017	
G60-D005E	October 5, 2018	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

This is the third renewal of the Title V permit for Toyota Motor Manufacturing West Virginia's Buffalo Plant. Since the issuance of the last Title V Permit Renewal changes to the facility include those addressed in the Minor Modifications MM01 and MM02 and the addition of a generator (GEN-Cafe) permitted under G60-C005D (which was added during this renewal). G60-D005E was issued to correct the mistaken removal of Generator (GEN-SEC) in G60-C005D.

Changes to the EU Table

- Generator GEN-Cafe was added to the Authorized Emergency Generators Permitted under G60-D005.
- The Emission Unit Table for Authorized Test/Firing Benches that had previously been included in Condition 5.1.5 has been moved to Section 1.1. Emission Units.

3.0 Facility-Wide Requirements

- Updated the boiler plate language.

4.0 Machining, Welding, and Assembly Operations [Project # 1 to 19] & Surface Coating Operations

- There have been no changes to the applicable State Rules (45CSR6, 45CSR7 and 45CSR21) since the Title V Permit Renewal. Therefore, no changes were needed in this section.

5.0 Combustion Operations, Testing and Heat Treatment

- No changes were needed in this section, all requirements come from R13-2062M.

6.0 Storage Tanks

- No changes were needed in this section, all requirements come from R13-2062M.

7.0 Emergency Generators

- Generator (GEN-Cafe) was added to the Permit and the Emission limits in condition 7.1.1 were updated.
- Appendix B: G60 General Permit was removed and applicable G60-D005E and G60-D requirements were added as Conditions 7.1.2 – 7.1.6, 7.4.1 – 7.4.3, and 7.5.1.

8.0 40 C.F.R. 63 Subpart ZZZZ requirements for Emergency Generators and 2 Fire Pumps

- Section 8.0 and Section 9.0 in R30-07900072-2013(MM02) both contained 40 C.F.R. 63 Subpart ZZZZ requirements. Therefore, the Sections were combined in R30-07900072-2018 as Section 8.0.
- Engines DG-5031 and the 2 Fire Pumps are Emergency Stationary CI RICE less than 500 HP located at an area source.
- Engines GEN-11E, GEN-11W, GEN-12, GEN-13 and GEN-SEC are Emergency Stationary SI RICE less than 500 HP located at an area source.
- Any applicable requirements of 40 C.F.R 63 Subpart ZZZZ that had previously been included by reference are now fully included.

9.0 40 C.F.R. 60 Subpart JJJJ requirements for Emergency Generators GEN-Pharm, GEN-IS-2 and GEN-Cafe

- There has been no change to 40 C.F.R 60 Subpart JJJJ since the issuance of the last Title V Permit. Therefore, no changes were needed in this section other than the addition of GEN-Cafe to the Conditions that are applicable: 9.1.1, 9.1.3 – 9.1.8, 9.2.1, 9.4.1, 9.4.2, 9.5.1, and 9.5.2.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 C.F.R. 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels.
The storage tanks at this facility are well under the 19,813 gallons required for Subpart Kb.

40 C.F.R. 64 – Compliance Assurance Monitoring (CAM). TMMWV has no single PSEU that has a pre-control device potential to emit equal to or greater than 100 percent of the amount, in tons per year, of any pollutants that would require the facility to be classified as a major source. According to 40 C.F.R. §64.2(a)(3), this facility is not subject to CAM.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Thursday, November 29, 2018
Ending Date: Wednesday, January 2, 2019

Point of Contact

All written comments should be addressed to the following individual and office:

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Division of Air Quality
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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

No Comments were received.