

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on January 15, 2019.

Permit Number: **R30-07900072-2019**
Application Received: **May 05, 2021**
Plant Identification Number: **03-54-079-00072**
Permittee: **Toyota Motor Manufacturing West Virginia**
Facility Name: **Buffalo Plant**
Mailing Address: **P.O. Box 600, Buffalo, WV 25033**

Permit Action Number: MM03 Revised: *October 26, 2021*

Physical Location: Buffalo, Putnam County, West Virginia
UTM Coordinates: 413.518 km Easting • 4,272.153 km Northing • Zone 17
Directions: The facility is located directly east of West Virginia State Route 62, approximately one 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.

This modification is to install three (3) copper laser welding machines and to modify production and emission limits throughout the permit.

Emissions Summary

Pollutant	Change (TPY)
CO	-62.98
NO _x	-27.51
PM/PM ₁₀ /PM _{2.5}	-22.45
SO ₂	+0.16
VOCs	-5.78

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 227.36 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Construction permit requirement
	45CSR30	Operating permit requirement.
	40 C.F.R. 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

State Only:

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)
R13-2062P	July 16, 2021	
G60-D005F	June 05, 2021	

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

The purpose of this modification is to install three (3) copper laser welding machines under the Exhaust Fans project and to modify production and emissions limits on:

Projects #1 and #2: 4-cylinder engine machining, assembly, and welding
Exhaust fan emissions for Building 100 and 200

Additionally, Projects #3, #5, #11, and #12 are being removed.

These modifications were approved under R13-2062P and required changes to the following permit conditions:

- The Emission Units Table was updated with the removal of the 6-cylinder engine assembly and the changing of source descriptions in R13-2062P; the addition of the copper laser welding machines; the addition of a new process type in Project #18 and Project #19; and design capacity changes to Engine Head Copper Coating and Authorized Test/Firing Benches
- Table 1.2 was updated, as R13-2062P supersedes and replaces R13-2062O
- Condition 4.1.2 was updated to reflect R13-2062P condition A.1.b changes.
- Condition 4.1.3 was updated to reflect R13-2062P condition A.1.c changes.
- Condition 4.1.8 was updated to include R13-2062P.
- Condition 4.1.21.c and e were updated to reflect R13-2062P condition A.1.d changes.
- Condition 4.1.23 was changed to "Reserved" since condition A.5.e was removed from R13-2062P.
- Condition 4.1.25 was added to reflect the addition of R13-2062P condition A.4.c.
- Condition 4.4.8 was updated to include R13-2062P
- Condition 5.1.1 was updated to reflect R13-2062P condition A.2.a changes.
- Condition 5.1.3 was changed to "Reserved" because the diesel electric generator DG-5031 was removed from R13-2062P.
- Condition 5.1.5.b was updated with new limits to reflect R13-2062P changes.
- Table 5.1.6 was updated with R13-2062P emission limit changes.
- Table 5.1.7 was updated with R13-2062P emission limit changes.
- Condition 5.4.4 was updated to reflect R13-2062P condition A.8.g changes.
- Condition 5.4.5 was updated with new wording to reflect R13-2062P changes.

Additional changes made as part of this modification include the removal of the anodizer process in Project #18 and the addition of emergency generators DG-5031 and GEN-AT HT to G60-D005F and are as follows:

- Table 1.2 was updated, as G60-D005F supersedes and replaces G60-D005E.
- Section 7.0 was updated to reflect G60-D005F changes.
- Section 10.0 was added since the added emergency generator (GEN-AT HT, 460 HP, 14.2L) is subject to 40 C.F.R. 60 Subpart III.
- Conditions 4.1.18, 4.2.4, 4.3.4, and 4.3.5 were changed to "Reserved" because the anodizer process in Project #18 was removed.

Non-Applicability Determinations

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

None

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: N/A for minor modifications
Ending Date: N/A

Point of Contact

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

Nikki B. Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41282
Nikki.b.moats@wv.gov

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)

Not applicable.