

# Fact Sheet



## For Proposed 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 October 6, 2008.

Permit Number: **R30-07900072-2008**  
Application Received: **February 28, 2011**  
Plant Identification Number: **03-54-07900072**  
Permittee: **Toyota Motor Manufacturing West Virginia**  
Facility Name: **Buffalo Plant**  
Mailing Address: 1 Sugar Maple Lane, P.O.Box 600, Buffalo, WV 25033

Permit Action Number: *MM01*      Revised: *Proposed*

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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.

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### Facility Description

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

The following are the changes in potential emissions due to this modification:

Pollutant	Change in potential emissions (+ or -), TPY
NOx	+ 27.72
CO	+ 77.24
PM	+ 0.968
VOC	+ 5.55

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of VOC's and Carbon Monoxide (CO). Due to this facility's potential to emit over 100 tons per year of criteria pollutants, 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 45CSR30	New Source Review Operating permit requirement.
State Only:	N/A	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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)
R13-2062K	October 11, 2011	

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 B," which may be downloaded from DAQ's website.

## Determinations and Justifications

The following changes have been made to the existing Title V permit:

1. The Table of Contents on pages 3 and 4 has been updated.
2. Project 13 has been deleted from Appendix A on page 6 and from Conditions 4.1.2 and 4.1.3.
3. Two gasoline storage tanks have been added to the Authorized Storage Tank list in Appendix A on page 9.
4. Some of the permit condition references have been changed due to the R13-2062K modification.
5. Condition 3.3.3 was added and requires the Permittee to develop and revise as necessary a plan to periodically test representative sources of air pollutants at the facility.
6. The VOC emission limits for the automatic transmissions and support (Condition 4.1.2) have been lowered due to more accurate testing information received.
7. Condition 4.1.20 has been added and requires that catalytic converters be used on the test cells listed in Condition 5.1.5 at all times the test cells are in operation.
8. A requirement has been added to Condition 5.1.2 to limit the maximum design heat input of propane combustion to not exceed 1.33 MMBtu/hr.
9. Condition 5.1.5 has been added and specifies Engine Test Cells and Firing Benches used at the facility and given hours of operation and control device requirements, as well as total hours of operation and gasoline usage.
10. Condition 5.1.6 has been added and provides aggregate combustion source emission limits for criteria pollutants.
11. Condition 5.1.7 has been added and provides individual combustion source emission limits for criteria pollutants.
12. Condition 5.4.4 has been added and requires monthly and annual records of the aggregate hours of operation.
13. Condition 5.4.5 has been added and requires monthly and annual records of aggregate gasoline combusted in the firing benches.
14. Condition 5.4.6 has been added and requires a list of all natural gas-fired combustion units at the facility.
15. Condition 6.1.1 has been added and adds gasoline storage tanks QC-AT and ET-01 to the facility.
16. Condition 4.2.1.a has been revised to include direct monitoring of the catalytic converter catalyst temperature. This will ensure the proper operation of the catalytic converter.
17. Condition 5.1.1 has been revised to specify the natural gas combustion sources authorized at the facility.

## Non-Applicability Determinations

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

1. *Greenhouse Gas Tailoring Rule*

This is a modified Title V Permit and there have been no modifications that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

2. *40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM)*

As a result of this modification, the facility now has a total Potential to Emit of greater than 100 tons per year of Carbon Monoxide. However, there is no single unit that has a potential, pre-control device potential to emit equal to or greater than 100 percent of the amount, in tons per year, of any pollutant that would require the facility to be classified as a major source. According to 40CFR§64.2(a)(3), this facility is not subject to CAM.

3. *40 C.F.R. Part 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels*

The two ethanol/gasoline storage tanks added to this Permit are 6,000 and 60 gallon capacity. This is well under the 19,813 gallons required for Subpart Kb.

4. *45CSR 2, 7, and 10 (PM from indirect heat exchangers, PM from manufacturing processes, Air Pollution from SO<sub>x</sub>)*

The test cells and firing benches are testing internal combustion engines and not “fuel burning units” as defined under 45CSR2 and 45CSR10, so those sections of the rules are not applicable.

45CSR§7-10.1 states that provisions of 45CSR7 shall not apply to mobile internal combustion engines.

### **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

Ending Date: N/A

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

Mike Egnor  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **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.

### **Point of Contact**

Mike Egnor  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

**(Choose)** Not applicable.

**OR**

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.