

Fact Sheet



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

Permit Number: **R30-07900072-2008**

Application Received: **August 30, 2007**

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

Issued: October 6, 2008

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

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	2006 Actual Emissions
Carbon Monoxide (CO)	63.85	0.5158
Nitrogen Oxides (NO _x)	57.89	2.0423
Particulate Matter (PM ₁₀)	75.3	N/A
Particulate Matter (PM _{2.5})	N/A	N/A

Total Particulate Matter (TSP)	75.3	0.93
Sulfur Dioxide (SO ₂)	3.32	0.0124
Volatile Organic Compounds (VOC)	241.18	57.72

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2006 Actual Emissions
VOC-HAPs	0.43	0.106
PM-HAPs	0.46	0.01

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

Title V Program Applicability Basis

This facility has the potential to emit 241.18 tons of VOC. 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	Particulate from Indirect heat Exchangers Open burning prohibited. SO ₂ from Indirect Heat exchangers Particulate from Manufacturing Standby plans for emergency episodes. The Secretary can request any pertinent information such as annual emission inventory reporting. Prevent and Control Emission of VOC's Operating permit requirement. Asbestos inspection and removal Ozone depleting substances
	45CSR6	
	45CSR10	
	45CSR7	
	45CSR11	
	45CSR13	
	WV Code § 22-5-4 (a) (14)	
	45CSR21	
	45CSR30	
	40 C.F.R. Part 61	
40 C.F.R. Part 82, Subpart F		
State Only:	45CSR4	No objectionable odors.

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, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2062J	June 26, 2008	
G60-B005	May 8, 2008	

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

Since the last modification there were two new 45CSR13 permits issued – R13-2062J and G60-B005. The conditions from the new permits have been incorporated in this renewal.

Non-Applicability Determinations

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

All storage tanks are less than 75 cubic meters (m³) capacity each – hence 40 C.F.R 60 Subpart Kb is not applicable to these storage tanks.

40 CFR60 Subpart IIII – this subpart is not applicable to the emergency generators because the generators are Spark Ignition ICE's. 45CSR13 General Permit and fact sheet incorrectly states that 40 CFR60 Subpart IIII is applicable to the Emergency Generators.

40 CFR60 Subpart JJJJ – this subpart is not applicable to the emergency generators because the generators are less than 500 HP and were ordered (commenced construction) before October, 2006. This subpart is not applicable to engines less than 500 HP which commenced construction before July 1, 2008. According to the company there were no modifications or reconstruction to these emergency generators after June 12, 2006.

40 C.F.R. 64 - CAM – The total facility is major only for VOC. CAM is not applicable to this facility because TMMWV does not operate any piece of equipment that has the potential to emit over 100 ton per year of VOC before control.

All fuel burning units at the Buffalo Plant are less than 10 mmBtu/Hr MDHI and therefore, pursuant to 45CSR§10-10.1 the fuel burning units are exempt from any MRR (Monitoring, Recordkeeping and Reporting).

As all fuel burning units at the Buffalo Plant are less than 10 mmBtu/Hr MDHI and, therefore, pursuant to Section 3.1(a) of 45CSR10A, are exempt from 45CSR10A.

As all fuel burning units at the Buffalo Plant are less than 10 mmBtu/Hr MDHI and, therefore, pursuant to Section 11.1 of 45CSR2, are exempt from any MRR (Monitoring, Recordkeeping and Reporting).

The following is a quotation from R13-2062C:

“The permittee shall develop, or continue the application of, a compliance monitoring plan with respect to

the operation of the control devices. This plan will identify the following:

- (1) Control device parameters that can be monitored to ensure operation of the control devices at or above their minimum control efficiencies.
- (2) Reasonable operating ranges for the control device parameters that ensure operation of the control devices at or above their minimum control efficiencies.
- (3) Validation of the ranges identified under (2) above either with manufacture's recommendations or on-site testing.

Within ninety (90) days of the issuance of this permit, the permittee shall submit the plan as detailed above to the Director. This plan shall be subject to the approval of the Director. A copy of the approved plan shall be kept on-site and made available to the Director or his/her duly authorized representative upon request."

The monitoring plan referred to in the permit has been developed due to the above R13-2062C requirement.

Company requested to take out the **name** of the computerized system (currently Maximo) in Sections 3.2.1 and 3.2.2 of the permit.

In Section 3.3.2 HVAC testing for NOx is taken out because present R13-2062J permit does not have NOx limit for HVACs.

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: August 19, 2008
Ending Date: September 18, 2008

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

U.K.Bachhawat
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th 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

U.K.Bachhawat
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1256 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

N/A