**DESCRIPTION OF MODIFICATION**

On January 13, 2025, the City of Huntsville Department of Natural Resources and Environmental Management (DNREM) received an application to renew the Title V Major Source Operating Permit (MSOP) for the Toyota Motor Manufacturing Alabama, Inc. (TMMAL) facility located at 1 Cottonvalley Drive in Huntsville, Madison County, Alabama. The only change to the MSOP is an administrative amendment to remove specific calculation equations utilized for Volatile Organic Compound (VOC) and Carbon Monoxide (CO) emissions identified in the MSOP. The addition or removal of emission sources covered under this permit has not been requested in this MSOP renewal process.

**BACKGROUND**

TMMAL is an existing engine/automotive component manufacturing facility (SIC 3714). Significant sources of air pollutants at this facility result from machining and assembly, solvent metal cold cleaning, and engine testing operations. Insignificant sources at TMMAL include fuel storage, and trivial activities include a cooling tower.

**PERMITTING HISTORY**

The initial MSOP was issued on October 12, 2004, and several renewals/modifications have been issued since, with the current MSOP being issued on July 15, 2020.

**FEDERAL APPLICABLE REGULATIONS**

*Title V*: When originally permitted, the TMMAL facility was classified as a major source under the Title V regulations due to the potential VOC and CO emissions exceeding the 100 ton/year major source thresholds. Currently, the only potential emissions exceeding the Title V major source thresholds are those from VOCs. Potential emissions of CO are below 100 tons/year, and actual emissions of VOC and CO are below 100 tons/year. The facility is a minor source of hazardous air pollutants (HAPs), as potential emissions of HAPs do not exceed the 10 ton/year individual or 25 ton/year total emission thresholds. The modifications requested in this permitting effort do not change the Title V major source status of the facility.

*Prevention of Significant Deterioration (PSD) of Air Quality*: The TMMAL facility is located in an attainment area for all criteria pollutants. At original permitting of the facility, emissions limitations below the PSD thresholds were imposed in the facility’s initial construction permit and resulting MSOP for VOCs and CO. Currently, at maximum capacity, the facility’s potential emissions of VOCs are below 250 tons/year, and as described in the Title V section above, potential CO and actual VOC and CO emissions are below even the Title V thresholds of 100 tons/year. To ensure PSD synthetic minor limitations are met, TMMAL is required to track material and fuel usage and calculate emissions on a monthly basis on a twelve-(12)-month rolling average. The modifications requested in this permitting effort do not impact the facility’s ability to remain in compliance with the existing PSD synthetic minor limitations.

*New Source Performance Standards (NSPS)*: There are no NSPS subparts applicable to the modifications in this permitting effort.

*National Emissions Standards for Hazardous Air Pollutants (NESHAP)*: TMMAL is considered an area source for HAPs as potential emissions do not exceed the 10 ton/year individual HAP and 25 ton/year total HAP major source thresholds. The modifications in this permitting effort do not affect the facility’s HAP area source classification.

**DNREM APPLICABLE REGULATIONS**

Visible Emissions (CoH APC RAR, Chapter 6.1): Changes to DNREM’s visible emission standards for stationary sources have not been modified in this permitting effort.

Particulate Emissions (CoH APC RAR, Chapter 6.4): Changes to DNREM’s particulate emission standards for general process industries have not been modified in this permitting effort.

**RECORDKEEPING**

TMMAL is to update emission calculation methods associated with VOC and CO, with emissions recorded on a monthly basis. Changes to recordkeeping requirements have not been modified in this permitting effort.

**REPORTING**

Changes to reporting requirements have not been modified in this permitting effort.

Emissions are required to be reported to DNREM through the required semi-annual monitoring reports.

**WORK PRACTICE REQUIREMENTS**

Changes to work practice requirements have not been modified in this permitting effort.

TMMAL has established procedures for ensuring the equipment is properly operated, and these procedures are subject to the approval of DNREM.

**COMPLIANCE ASSURANCE MONITORING (CAM)**

There are no CAM requirements associated with the modifications requested in this permitting effort.

**PUBLIC NOTICE**

The renewal of TMMAL’s Title V MSOP requires a thirty-(30)-day public comment period and a forty-five-(45)-day EPA review period.

**RECOMMENDATION**

The Statement of Basis indicates that all these sources will meet the requirements of all federal and City of Huntsville Rules and Regulations, as described. Therefore, I recommend that the Title V MSOP be issued to TMMAL and include the administrative amendment to remove specific calculation equations utilized for VOC and CO emissions, pending the full receipt of fees associated with this permitting effort and resolution of any comments received during the public comment and EPA review periods described above.

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A. Lance Williams, Senior Environmental Specialist

Department of Natural Resources and Environmental Management

City of Huntsville