

SUPPLEMENT TO PERMIT NO. 467-97

Benteler Automotive, Inc.
Grand Rapids, Michigan

February 9, 1998

GENERAL CONDITIONS

1. Rule 201(1) - The process or process equipment covered by this permit shall not be reconstructed, relocated, altered, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule.
2. Rule 201(4) - If the installation, reconstruction, relocation, or alteration of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the person to whom this permit was issued, or the designated authorized agent, shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or alteration of the equipment allowed by this Permit to Install.
3. Rule 201(6)(a) - If this Permit to Install is issued for a process or process equipment located at a stationary source which is subject to a Renewable Operating Permit pursuant to Rule 210, trial operation is allowed if the equipment performs in accordance with the terms and conditions of this Permit to Install and until the appropriate terms and conditions of this Permit to Install have been incorporated into the Renewable Operating Permit as a modification pursuant to Rule 216 or upon renewal pursuant to Rule 217. Upon incorporation of the appropriate terms and conditions into the Renewable Operating Permit, this Permit to Install shall become void.
4. Rules 201(7)(a) or 216(1)(a)(v)(A) - Except as provided in General Condition No. 3, operation of the process or process equipment is allowed if, not more than 30 days after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this Permit to Install was issued, or the authorized agent pursuant to Rule 204, notifies the District Supervisor, Air Quality Division, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, alteration, or modification is considered to occur not later than commencement of trial operation of the process or process equipment.
5. Rule 201(7)(b) - Except as provided in General Condition No. 3, not more than 18 months after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this permit was issued, or the authorized agent pursuant to Rule 204, shall notify the District Supervisor, Air Quality Division, in writing, of the status of compliance of the process or process equipment with the terms and conditions of the Permit to Install. The notification shall include all of the following:
 - A. The results of all testing, monitoring, and recordkeeping performed to determine the actual emissions from the process or process equipment and to demonstrate compliance with the terms and conditions of the Permit to Install.
 - B. A schedule of compliance for the process or process equipment as described in Rule 119(a).

- C. A statement, signed by the person owning or operating the process or process equipment, that, based on information and belief formed after reasonable inquiry, the statements and information in the notification are true, accurate, and complete.
6. Rule 201(8) and Section 5510 of Act 451, P.A. 1994 - The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Departments' rules or the Clean Air Act.
 7. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required in Rule 219(1)(a), (b) and (c). The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality.
 8. Rule 901 - Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.
 9. Rule 912 - The owner or operator of a source, process, or process equipment shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant in excess of standards for more than one hour, or of any air contaminant in excess of standards for more than two hours, as required in this rule, to the District Supervisor, Air Quality Division. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the District Supervisor within 10 days, with the information required in this rule.
 10. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future regulations which may be promulgated under Part 55 of Act 451, P.A. 1994.
 11. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
 12. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, P.A. 1994, and the rules promulgated thereunder.

SPECIAL CONDITIONS

13. Total carbon monoxide emissions from the facility shall not exceed 88 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.
14. Total nitrogen oxide emissions from the facility shall not exceed 88 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.
15. Total HAP emissions from the facility shall not exceed 22 tons per year. Individual HAP emissions shall not exceed 8.9 tons per year. Both limits are based on a 12-month rolling time period as determined at the end of each calendar month.
16. The carbon monoxide (CO) emission rate from the 3 dynamometer test cells shall not exceed 560 pounds per day nor 70 tons per year. The emission rates are based on an average emission factor of 0.93 pounds of CO per gallon of unleaded gasoline used.
17. The nitrogen oxide (NOx) emission rate from the 3 dynamometer test cells shall not exceed 2.87 pounds per hour nor 8.6 tons per year. The emission rates are based on an average emission factor of 0.115 pounds of NOx per gallon of unleaded gasoline used.
18. Applicant shall not use more than 150,000 gallons of unleaded gasoline per year based on 12-month rolling time period as determined at the end of each calendar month. Calendar monthly usage records and the calculation of the 12-month rolling average fuel usage rates shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.
19. Applicant shall not use more than 600 gallons of unleaded gasoline in the 3 dynamometer test cells per day. Daily fuel usage rates shall be calculated based upon monthly usage prorated to a daily rate. Should the prorated daily rate exceed 90% of the daily limit, the applicant shall commence daily recordkeeping for a minimum of two months until the prorated rate falls below 90% of the daily limit as calculated at the end of each calendar month.
20. Visible emissions from the dynamometer test cells shall not exceed a 6-minute average of 20% opacity, except as specified in Rule 301(1)(a).
21. Rules 1001, 1003 and 1004 - Verification of NOx and/or CO emission rates from the dynamometer test cells by testing, at owner's expense, in accordance with Department requirements, may be required for operating approval. Verification of emission rates includes the submittal of a complete report of the test results. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the District Supervisor, Air Quality Division, and results shall be submitted within 120 days of the written requirement for such verification.

22. The exhaust gases from the 3 dynamometer test cells shall be discharged vertically upwards to the ambient air from stacks as indicated as follows:

<u>Process:</u>	<u>Stack Height:</u>	<u>Stack Diameter:</u>
#1 test cell	34 feet	4 inches
#2 test cell	34 feet	4 inches
#3 test cell	34 feet	4 inches

23. Applicant shall not operate the dynamometer test cells(during a fueled duty cycle) unless the individual air injection control system is installed and operated properly.(Exception: Applicant may elect to not to use the air injection control system during non-durability tests if use of the air injection system would interfere with the test. Emission limits stated in Conditions #16 and #17 still have to be met even if the control device is not used.)
24. Applicant shall not operate an individual dynamometer test cell(during a fueled duty cycle) unless the measured exhaust temperature near the point of injection is maintained above 1000° F.
25. Applicant shall monitor and record the temperature(during a fueled duty cycle) of the individual dynamometer test cell exhaust gases at the point of air injection in a manner and with instrumentation acceptable to the Air Quality Division. The temperature monitoring devices shall be installed, operated, calibrated and maintained according to manufacturer's instruction. All temperature records shall be kept of file for a period of at least five years and made available to the Air Quality Division upon request.
26. Applicant shall monitor and record CO emissions from the dynamometers on a periodic basis in a manner and with instrumentation acceptable to the Air Quality Division. All information/data shall be kept on file for a period of at least 5 years and made available to the Air Quality Division upon request.