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TitleRESULTS OF VISIBLE EMISSION COMPLIANCE
TESTING FOR FOUNDRY OPERATIONS

Report Date April 25, 2018

Test Date(s) April 17, 2018

Facility Information	
Name:	Brembo North America, Inc.
Street Address:	M60 and Van Wert Rd
City, County:	Albion Township, Calhoun
SRN:	N6226

Permit/Emission Unit Information

Permit To Install No.:

PTI 199-14A, 145-12B

Testing Contractor	
Company:	Derenzo Environmental Services
Mailing Address:	39395 Schoolcraft Rd. Livonia, MI 48150
Phone:	(734) 464-3880
Project No.	1803007

Derenzo Environmental Services Consulting and Testing

RESULTS OF VISIBLE EMISSION COMPLIANCE TESTING FOR FOUNDRY OPERATIONS

BREMBO NORTH AMERICA, INC. HOMER, MI

1.0 INTRODUCTION

Brembo North America, Inc. (Brembo) manufactures high-performance automobile brake system components at its facility located in Homer / Albion Township, Calhoun County (Facility State Registration No., SRN N6226). A Renewable Operating Permit (MI-ROP-N6226-2015) has been issued to the stationary source for existing brake finishing and assembly operations.

The facility is classified as a new foundry that is part of a major stationary source of hazardous air pollutant (HAP) emissions and is subject to the provisions of the National Emission Standards for Hazardous Air Pollutants from Iron and Steel Foundries (40 CFR Part 63 Subpart EEEEE, Iron and Steel Foundry MACT).

The conditions of Permit to Install 199-14A and the Iron and Steel Foundry MACT require that visible emission (VE) observations be performed to determine the opacity of any fugitive emissions from the building that houses the foundry operations.

Thomas Andrews performed the VE testing for the Brembo foundry operations on April 17, 2018. Ms. Vivian Rowles and Mr. Jessy Conard, of Brembo, coordinated the project. The observations presented in this report were performed within six months of the previous observations, which were performed October 17, 2017.

A notification for the VE testing was submitted to the MDEQ-AQD on March 19, 2018 prior to the performance test.

Derenzo Environmental Services

Questions concerning this emission report should be directed to:

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	HSE Manager
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Report Certification

This test report was prepared by Derenzo Environmental Services based on field observations collected by Derenzo Environmental Services. This test report has been reviewed by Brembo representatives and approved for submittal to the MDEQ.

I certify that the testing was conducted in accordance with the specified test methods and submitted test plan unless otherwise specified in this report. I believe the information provided in this report and its attachments are true, accurate, and complete.

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Report Prepared By:

Tom Andrews Environmental Consultant Derenzo Environmental Services

2.0 SUMMARY OF TEST RESULTS AND SAMPLING LOCATION

2.1 Fugitive Emissions

USEPA Method 9 procedures were used to evaluate the opacity of fugitive emissions being released from the Brembo building that houses iron and steel foundry emissions sources. All visible emissions determinations were performed by a qualified observer in accordance with USEPA Method 9, Section 3. The qualified observer was located at a distance sufficient to provide a clear view of the emission source(s) with the sun oriented in the 140° sector to his back. As much as possible, the line of vision was approximately perpendicular to the plume direction (though no plumes were observed).

Observations were recorded at 15-second intervals. The fugitive VE opacity observations were performed for three (3) continuous hours (30, 6-minute averages) on April 17, 2018.

No visible emissions were observed (all recorded values are 0%). The facility is in compliance with the opacity limit in §63.7690(a)(7) for fugitive emissions from buildings or structures housing iron and steel foundry emission sources.

2.2 Sampling Location

USEPA Method 9 procedures were used to evaluate the opacity of fugitive emissions being released from the Brembo building housing iron and steel foundry emissions sources. The observer chose a location in the east parking lot with clear views of the north dock doors, sand handling truck door, and east facility doors (no openings were identified for the west side of the facility).

Attachment 1 provides field data sheets with an appropriate VE observation point diagram and a copy of the observer's certification.