

AIR EMISSION TEST REPORT

Title

RESULTS OF VISIBLE EMISSION COMPLIANCE

TESTING FOR FOUNDRY OPERATIONS

RECEIVED

Report Date

October 19, 2018

NOV 15 2018

Test Date(s)

October 16, 2018

AIR QUALITY DIVISION

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.

1803005

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 October 16, 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 April 17, 2018.

A notification for the VE testing was submitted to the MDEQ-AQD on October 1, 2018 prior to the performance test.

Derenzo Environmental Services

Questions concerning this emission report should be directed to:

Testing

Tom Andrews

Procedures

Environmental Consultant

Derenzo Environmental Services

39395 Schoolcraft Road Livonia, MI 48150 tandrews@derenzo.com

(734) 464-3880

Compliance

Jessy L Conard

Manager

Health, Safety & Environmental Manager

Brembo North America 47765 Halyard Dr. Plymouth MI 48170 jconard@us.brembo.com

(734) 468-2092

Site Operations

Vivian Rowles

HSE Manager

Brembo North America

6259 30-Mile Rd

Homer MI

vrowles@us.brembo.com

(734) 928-8664

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.

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 October 16, 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.