



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREETHER  
DIRECTOR

January 9, 2017

Mr. Jessy Conard  
Brembo North America Inc.  
47765 Halyard Drive  
Plymouth, Michigan 48170

SRN: N6226, Calhoun County

Dear Mr. Conard:

**VIOLATION NOTICE**

The Department of Environmental Quality (DEQ), Air Quality Division (AQD), is in receipt of the December 16, 2016, test report submitted by Brembo North America Inc. (Brembo) for their foundry operations located at 29991 M-60 East, Homer, Michigan. The emission testing was performed on October 19-20, 2016, (EUSHAKEOUT, FGPOURCOOL and FGSANDHNDLG) and on November 10, 2016, (FGMELTING). Testing was required to be completed no later than October 24, 2016, under Permit to Install (PTI) No. 199-14A.

Based on a review of the emission test report, staff of the AQD noted the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUSHAKEOUT	R 336.1205, R 336.1702(a)/PTI No. 199-14A, Condition I.3	Volatile organic compound (VOC) emission limit is 3.19 pounds/hour. The average tested rate was 6.86 pounds/hour.
FGSANDHNDLG	R 336.1205, 40 CFR 52.21(c) and (d)/PTI No. 199-14A, Condition I.5	Particulate matter (PM) 2.5 emission limit is 1.58 pounds/hour. The average tested rate was 2.1 pounds/hour.
FGPOURCOOL	R 336.1205, R 336.1702(a)/PTI No. 199-14A, Condition I.9	VOC emission limit is 1.44 pounds/hour. The average tested rate was 1.63 pounds/hour.
FGPOURCOOL	R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, 40 CFR 52.21(c) and (d)/ PTI No. 199-14A, Condition IV.3	Condition requires a minimum VOC destruction efficiency (DE) for the regenerative thermal oxidizer of 95% by weight. The average DE test rate was 91.0%.

FGPOURCOOL	R 336.1301, R 336.1331/PTI No. 199-14A, Condition I.1	PM emission limit is 0.24 pounds/hour. The average tested rate was 0.34 pounds/hour.
FGPOURCOOL	R 336.1205, 40 CFR 52.21(c) and (d)/PTI No. 199-14A, Condition I.3	PM10 emission limit is 0.75 pounds/hour. The average tested rate was 0.92 pounds/hour.
FGPOURCOOL	R 336.1205, 40 CFR 52.21(c) and (d)/PTI No. 199-14A, Condition I.5	PM2.5 emission limit is 0.75 pounds/hour. The average tested rate was 0.92 pounds/hour.
FGMACTEEEEEE	40 CFR 63.7690(a)(6)(i)/ PTI No. 199-14A, Condition I.3	PM emission limit is 0.002 grains/dry standard cubic foot (dscf). The average tested rate was 0.0052 grains/dscf.

Section 3.0 of the December 16, 2016, emission test report states: "Production at the Brembo foundry is ramping up from its initial startup earlier this year. During the October/November test periods the processes were operated at normal operating conditions but are not yet at maximum capacity." The October 2016 and November 2016 test events are considered to have satisfied the testing deadline under PTI No. 199-14A; however, facility wide re-testing will be required in 2017 in order to meet the requirements of Rule 336.2003(3). Per Rule 336.2003(3) that states in part, "All performance tests shall be conducted while the source of air contaminant is operating at maximum routine operating conditions, or under such other conditions, within the capacity of the equipment."

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 30, 2017, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. The written response should also include a time line to complete facility wide re-testing in 2017 that meets the requirements of Rule 336.2003(3).

If Brembo believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Mr. Jessy Conard  
Page 3  
January 9, 2017

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring Brembo into compliance, please contact me at the telephone number listed below.

Sincerely,



Rex I. Lane  
Senior Environmental Quality Analyst  
Air Quality Division  
269-567-3547

RIL:CF

cc: Mr. Daniel Sandberg, Brembo  
Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Mary Douglas, DEQ