

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Brembo North America, Inc.	SRN : N6226
Location : 29991 M 60 EAST	District : Kalamazoo
	County : CALHOUN
City : HOMER State: MI Zip Code : 49245	Compliance Status : Compliance
Source Class : MAJOR	Staff : Amanda Chapel
FCE Begin Date : 1/1/2020	FCE Completion Date : 3/5/2021
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
03/03/2021	Other Non ROP		Facility submitted a monthly CEMS progress update report. Facility reports that there has been a delay in the process between Brembo and the supplier. Once the project is no longer on pause, they will evaluate the amount of time the delay has added and will communicate that in the next update.
02/23/2021	On-site Inspection	Compliance	
02/23/2021	On-site Inspection	Compliance	Brembo Foundry Records Review and On-Site Inspection
02/13/2021	ROP Other	Compliance	The facility submitted results of the required transfer efficiency (TE) testing. The facility tested the Blechtopf (EU-Zinc-05) line and Line 60 (Brentro 1 or EU-Zinc-03) with two different parts. These are the only two lines at the facility that spray zinc paint. Results are as follows: Blechtopf PN 19D32920MCH 95.2% TE Line 60 PN 19.A96.18 72.1% TE Line 60 PN 19.R.124.20 76.6% TE

Activity Date	Activity Type	Compliance Status	Comments
02/12/2021	MACT (Part 63)	Compliance	<p>Subpart MMMM NESHAP Semiannual Compliance reported as required under 40 CFR 63.3920(a).</p> <p>The facility submitted the certification on an ROP form with an original signature and date from the responsible official. The facility certifies that they use all compliant coatings to comply with NESHAP MMMM. The results are as follows:</p> <p>Magni 0.02 lb HAP/gal solids GeoMet 2.13 lb HAP/gal solids Zinc Dust 2.43 lb HAP/gal solids 1102 2.55 lb HAP/gal solids Emission limit 2.6 lb HAP/gal solids</p>
02/12/2021	MACT (Part 63)	Compliance	<p>Subpart EEEEE NESHAP Semiannual Compliance Report as required under 40 CFR 63.7751(a)</p> <p>The facility reported no deviations or malfunctions. The CEMs is not certified by EGLE due to lack of DAHS system. A new system is slated to be installed summer 2021 to meet certification requirements.</p>
02/01/2021	Other Non ROP	Compliance	<p>Facility submitted a monthly CEMS progress update report. Facility reports that everything is progressing on schedule. Proposed schedule:</p> <p>February 5th - Drawings for CEMs delivered February 12th - Drawings for CEMs approved by Brembo February 19th - Start production of CEMs April 19th - Shipment to Brembo May 3rd - Start of Installation June 7th - Start-up of CEMs</p>
12/18/2020	Other Non ROP		<p>December CEMs update report - No new updates since last report. Purchase order for two new CEMs to be submitted in January 2021.</p>
12/14/2020	Excess Emissions (CEM)	Compliance	<p>2020 Third Quarter Gas Audit Report</p> <p>Facility submitted the 3rd quarter CGA report performed on August 27, 2020. The calculated accuracy was 3.8% and 4.9% respectively.</p>

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12/14/2020	ROP Qrtly Cert	Compliance	The facility submitted the report with an original signature and date on an ROP Certification form. The facility reports that it was in compliance with all terms and recordkeeping requirements contained in the ROP and no deviations occurred during the time period either in disc plant or the foundry.
12/14/2020	Excess Emissions (CEM)	Compliance	The facility submitted the report with an original signature and date on an ROP Certification form. The facility reports that it was in compliance with all terms and recordkeeping requirements contained in the ROP. The facility did not experience any excess emissions from either section according to records.
12/14/2020	CEM RATA	Compliance	The facility submitted the report with an original signature and date on an ROP Certification form. The facility reports that the CEMS is not certified by the State of Michigan due to issues with the DAHS system. Timelines are being submitted to the state to show progress on purchasing an acceptable system with DAHS.
12/14/2020	ROP Other	Compliance	Brembo notified the Department on October 26, 2020 that the following MAP plans were updated: Acid Scrubber MAP Pouring and Cooling Baghouse Integrated Plan Melt Shop Baghouse Integrated Plan Finish Baghouse MAP Sand System MAP
11/30/2020	Other Non ROP	Compliance	CEMs update report - No new updates since last report. Purchase order for two new CEMs to be submitted in January 2021.
11/05/2020	Other Non ROP	Compliance	Facility submitted the monthly CEMs update report as required by the district and TPU. Facility states that the budget to replace the CEM system has been approved. In January 2021, drawings will be submitted to the facility with a startup date of June 2021.

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11/05/2020	Other Non ROP	Compliance	Facility notified the department that they had solicited bids to replace the CEMs from three different suppliers. After review of the proposals compared to the NESHAP requirements, Monitoring Solutions was chosen as the supplier to replace the CEMs.
11/05/2020	Other Non ROP	Compliance	Facility submitted the September CEMs report. The report states that Monitoring Solutions evaluated the site and changed the proposed project to update flow monitors needed on site. The target is to start the process of purchasing and installing the CEMs beginning January 2021 ending June 2021.
10/28/2020	ROP Annual Cert	Compliance	Facility reports that during the entire reporting period, the source was in compliance with all terms and conditions contained in the ROP. - AC 10/28/20
10/28/2020	ROP SEMI 2 CERT	Compliance	Facility reports that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred. - AC 10/28/20
09/09/2020	Stack Test Observation	Unknown	
07/21/2020	Excess Emissions (CEM)	Compliance	Facility submitted their 2nd Quarterly Cylinder Gas Audit (CGA) completed by Impact Compliance and Testing. The sand shakeout CEMS had two audit points, the first audit point with an accuracy of +6.0% and difference of +1.67 ppm. The second audit point had an accuracy of +12.1% and a difference of +1.55 ppm. These are both within 5 ppm of the CGA concentration. For the RTO CEMS, two audit points were calculated. The first audit point had a +4.9% accuracy and difference of 1.38 ppm. The second point was +5.2% accuracy and difference of 0.66 ppm. There are both within 5 ppm of the audit gas concentration.

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07/21/2020	MACT (Part 63)	Compliance	<p>Subpart MMMM NESHAP Semiannual Compliance Reported as required under 40 CFR 63.3920(a).</p> <p>Facility submitted the NESHAP MMMM report with the signature of the responsible official. The facility reports that all coatings are compliant with the NESHAP requirement. Facility reports: Magni 0.02 lb HAP/gal solids, GeoMet 2.13 lb HAP/gal solids, Zinc Dust 2.43 lb HAP/gal solids, 1102 2.5 lb HAP/gal solids, and RP 0.00 lb HAP/gal solids. Emission limit is 2.6 lb HAP/gal solids.</p>
07/21/2020	MACT (Part 63)	Compliance	<p>Subpart EEEEE NESHAP Semiannual Compliance Report as required under 40 CFR 63.77551(a).</p> <p>ROP certification report included with the MACT Subpart EEEEE report contains an original dated signature by the facility's responsible official. MACT report indicates that there were no startup, shutdown or malfunction events during the reporting period and no deviations from emission limitations, work practice standards or operation and maintenance requirements. The report does indicate that the Method 9 readings were completed by a non-certified reader due to COVID-19. It also states the CEMS is not certified by EGLE. The report further states that Brembo is not aware of any periods when the CEMS which monitor VOHAP emissions from Cooling and Shakeout were out-of-control during the reporting period.</p>

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07/21/2020	Excess Emissions (CEM)	Unknown	<p>The facility submitted the quarterly ROP report, CEMS operation, and excess emissions on the ROP certification form, signed by the responsible official. The facility reports there are no ROP deviations at the Homer Disc plant. The facility reports the following deviations at the Homer Foundry: the semi-annual opacity readings was late and completed by a non-certified reader, who had previously been certified, due to COVID-19 and the 1st quarter ROP and CEMS report were late due to plant shutdown attributed to COVID-19.</p> <p>The facility also reports there were no, known excess emissions from the facility during the time period of the reporting. The Sand CEMS reported a downtime of 47.56 hours or 8.71% of the run time. The RTO CEMS reported a downtime of 26.9 hours or 4.93% of the run time. The CEMS is not certified by EGLE and the facility is working toward installing a new CEMS and DAHS to comply with the MACT EEEEE and EGLE requirements.</p>
07/06/2020	MACT (Part 63)	Compliance	<p>Facility submitted certification that the visible emissions testing was completed on May 27, 2020 by Impact Compliance and Testing. The VE testing was completed for the building that houses the foundry operations. The visible emissions were performed by someone who was not currently certified to read visible emissions, due to COVID-19, but had previously been certified.</p>
06/08/2020	Excess Emissions (CEM)	Compliance	<p>The facility submitted the form with a signed ROP certification form indicating it contained a quarterly report for excess emissions and CEMs. The facility did not report any excess emissions for either the Brembo Homer foundry or the Homer disc plant.</p>
03/11/2020	Stack Test Observation	Compliance	

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02/07/2020	MACT (Part 63)	Compliance	<p>Subpart MMMM NESHAP Semiannual Compliance Report as required under 40 CFR 63.3920 (a).</p> <p>Facility submitted information showing the coatings at the facility are in compliance with the limit of 2.6 lb HAP/gal found in 63.3890(b) (1).</p> <p>Magni 0.02 lb HAP/gal Black 0 lb HAP/gal GeoMet 2.13 lb HAP/gal Zinc Dust 2.43 lb HAP/gal 1102 2.55 lb HAP/gal</p>
01/23/2020	MACT (Part 63)	Compliance	<p>Subpart EEEEE NESHAP Semiannual Compliance Report as required under 40 CFR 63.7751(a). Facility submitted a signed certification report with original signature and date of responsible official.</p> <p>At the time of the report, facility certifies that they are unaware of any deviation that caused, or could have potentially caused, a 5E NESHAP emission limit to be exceeded while the foundry was in operation during the reporting period.</p>

Name: *Amber Clapp* Date: 3/5/21 Supervisor: *R/L 3/9/21*