



Sent Via E-mail & FedEx this Date

August 23, 2017

Rex Lane
Senior Environmental Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division
Kalamazoo District
7953 Adobe Road
Kalamazoo, MI 49009-5026

**RE: Brembo North America, Inc. – Homer Foundry
AQD Source ID (SRN): N6226
Violation Notice Response**

Dear Mr. Lane:

Brembo North America, Inc. (Brembo or the company) is submitting this letter in response to the MDEQ's Violation Notice dated August 2, 2017 (VN).

In response to the alleged violations regarding the Operation & Maintenance (O&M) and Malfunction Abatement Plans (MAP), Brembo has previously submitted the most current versions of the plans to the DEQ and does not feel a violation occurred. The company will continue to provide the most current plans to the DEQ in the event changes are made.

In response to the alleged violations for the high acid scrubber pH and low liquid level regarding EU-COREMAKING condition IV.1 and IV.5, the acid scrubber was not fully operational at the time of the inspection due to a failure associated with the scrubber solution pump. The company was not aware that the scrubber operation parameters must be maintained while the equipment is not in service. The pH and liquid level were immediately returned to normal operating ranges once repairs were completed.

In response to the alleged violation regarding the inspection record for the acid scrubber, the facility was unable to locate the original "hard copy" of last quarters' inspection record for the acid scrubber. The facility has been in process of transitioning all equipment to CARL, which is our facility wide maintenance management system. Although every intent was to keep and maintain all original hard copy inspection/repair records generated prior to transitioning each piece of equipment to the CARL system, the company has been unable to locate the pre-CARL original hard copy records for the acid scrubber as requested.

In response to the alleged violation for the obstructed exhaust stack for the emergency generator, Brembo was unaware that a rain guard had been installed on this exhaust stack. Once identified, situation was immediately remedied by removing the rain guard. Brembo conducted an inspection of all similar stacks to verify rain guards were not installed on other similar stacks.

BREMBO NORTH AMERICA INC.

47765 Halyard Drive
Plymouth, MI 48170
Tel.: +1 (734) 468-2100
Fax: +1 (734) 468-2161

www.brembo.com



In response to the alleged violation regarding the failure to monitor the combined 3-hour average VOHAP concentration from the cooling and shakeout lines, the company is currently in the process of tying both CEMS units to the plant SKADA system, which will then automatically calculate, monitor and display the combined 3-hour average VOHAP concentration from both the cooling and shakeout CEMS.

Currently the plant is easily able to determine it complies with their emission limit of 20 ppmv for the combined 3-hour average VOHAP concentration for the shakeout and cooling lines by monitoring each CEMS for compliance individually. With each unit easily demonstrating compliance individually with concentrations well below 20 ppmv VOHAP, it is easy to conclude that once averaged together the result will still be less than 20 ppmv VOHAP.

In response to the alleged violation for failure to display and continually monitor the acid scrubber parameters, the company is currently in process of investigating and correcting any identified gaps in compliance. The original manufacturer/installer of the acid scrubber went out of business and Brembo has struggled to find another reputable scrubber manufacturer willing to assist.

Brembo has located a third party vendor specializing in acid scrubbers and related systems, and is currently working with that vendor to assist with identifying and correcting any potential issues relating to how the scrubber parameters (flow rate, pH and pressure drop) are measured, displayed and recorded. Brembo is actively working with this vendor to complete this process as quickly and efficiently as possible. As this process continues and we develop more definitive corrective actions and expected completion dates, we will communicate this new information to the DEQ.

Brembo looks forward to working closely with MDEQ to address the matters expressed in the VN. If you have any questions related to the information provided herein please contact me directly at (734) 468-2092 or jconard@us.brembo.com.

Sincerely,
Brembo North America, Inc.

Jessy L. Conard
Safety, Health and Env. Manager

cc: Dan Sandberg, Vivian Rowles – Brembo (via e-mail)
Mark Jacobs – Dykema (via e-mail)
Chris Blume – RPS GaiaTech (via e-mail)

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