



*Sent Via E-mail & FedEx this Date*

October 30, 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 October 24, 2017 (VN). At this time, the company is providing below written responses to the elements specified in the VN:

**1. Dates the alleged violation occurred:**

After review of internal records, Brembo can confirm that they did not submit the facilities semi-annual monitoring and deviation report for January 1 – June 30, 2017 by September 15, 2017 as required.

**2. Explanation of the causes and duration of the alleged violation:**

Brembo North America contracts with an external environmental consultant to manage the timelines and reporting of this report. It appears that internal miscommunication on the side of our consultant while creating and submitting the semi-annual 4M and 5E NESHAP reports caused this particular report to be overlooked. Report was drafted with other semi-annual reports but the final version was never released or submitted.

**3. Whether the alleged violation is ongoing:**

The alleged violations are not ongoing. The draft semi-annual report was reviewed, and certified as our official report. A copy of the report is accompanying this letter both via email and FedEx.

**4. Summary of the actions that have been taken and are proposed to be taken to correct the alleged violation and the dates by which these actions will take place:**

The report which triggered the VN has been completed and is being submitted along with this violation notice. This is the corrective action taken to close out the open VN.

**5. Steps being taken to prevent a reoccurrence:**

Brembo North America is in the process of identifying each regulatory reporting requirement (or similar) for all of their plants within North America and placing them onto a central database for

**BREMBO NORTH AMERICA INC.**

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north america

proper management. This will allow for better oversight and control at the corporate level and provide a more robust process to identify and comply with similar requirements.

Brembo North America 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](mailto:jconard@us.brembo.com).

Sincerely,

**Brembo North America, Inc.**

A handwritten signature in blue ink, appearing to read 'J. Conard', written over a horizontal line.

Jessy L. Conard

*Health, Safety & Env. Manager*

*North America Operations*

cc: Dan Sandberg & Vivian Rowles – Brembo (via e-mail)

cc: Mark Jacobs – Dykema (via e-mail)

cc: Chris Blume – RPS GaiaTech (via e-mail)

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