

AIR EMISSION TEST REPORT

Title RESULTS OF VISIBLE EMISSION COMPLIANCE

TESTING FOR FOUNDRY OPERATIONS

Report Date October 14, 2019

Test Date(s) October 14, 2019

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: Impact Compliance & Testing, Inc.

Mailing Address: 4180 Keller Road Holt, MI 48842

Phone: (517) 268-0043

Project No. 1900139

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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.

Jory VanEss performed the VE testing for the Brembo foundry operations on October 14, 2019. Ms. Vivian Rowles, of Brembo, coordinated the project. The observations presented in this report were performed within six months of the previous observations, which were performed April 16, 2019.

A notification for the VE testing was submitted to the EGLE-AQD on September 13, 2019 prior to the performance test.

Questions concerning this emission report should be directed to:

Testing Jory VanEss

Procedures Environmental Consultant

Impact Compliance & Testing, Inc

4180 Keller Road Holt, MI 48842

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(517) 268-0043

Compliance

Vivian Rowles

Manager

Health, Safety & Environmental Manager

Brembo North America

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Homer MI

vrowles@us.brembo.com

(734) 928-8664

Report Certification

This test report was prepared by Impact Compliance & Testing, Inc. based on field observations collected by Impact Compliance & Testing, Inc. This test report has been reviewed by Brembo representatives and approved for submittal to the EGLE.

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:

Jory VanEss

Environmental Consultant

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 14, 2019.

No visible emissions were observed (all recorded values are 0%). The facility maintains 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, appropriate VE observation point diagram, 6-minute averages, and a copy of the observer's certification.

2.3 Deviations from Test Plan

The test notification submitted to EGLE-AQD on September 13, 2019 prior to the performance test specified a test date of October 15, 2019. Testing was completed on October 14, 2019 to accommodate the availability of a VE certified reader. All methods and procedures specified within the test notification remained identical during testing period.

Attachment 1

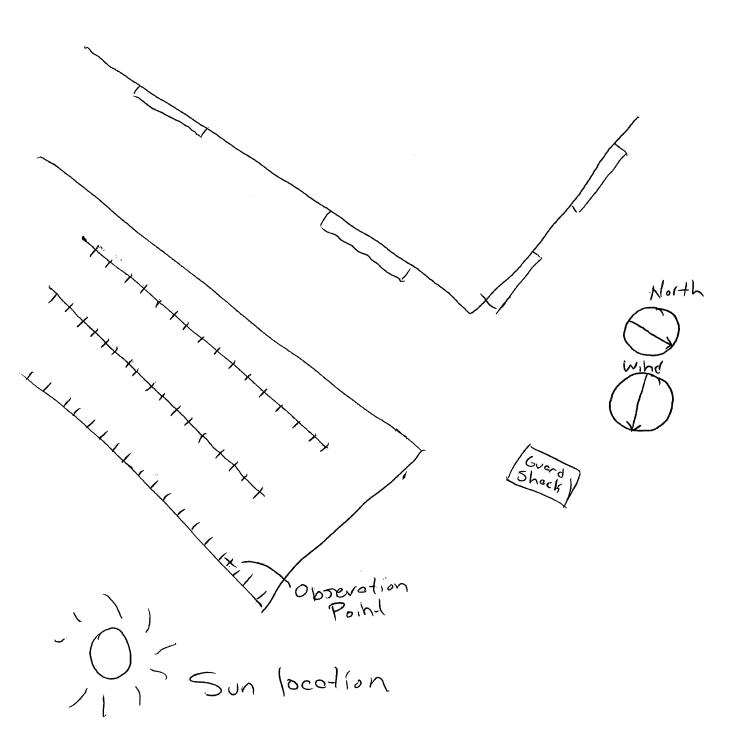
Field Data Sheets 6-minute averages Observation Point Diagram VE Certification

Impact Compliance & Testing, Inc.

Visible Emission Observation Form		Visible Emission	Observatio	n Form		Visible Emi	ssion Observat	tion Form					
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Street Address 2999 F MGO		Street Address				Street Address							
City Homer State M	I Zip 49425	City		State	Zip	City		State	Zip				
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Six-Minute USEPA Method 9 Opacity Averages

at Brembo North America, Inc Homer, Michigan Test Date: October 14, 2019

						Hour: 2						Hour: 3					
Start Time:	10:40	End Time:		Page 1 of 1		Start Time:	11:40	End Time:		Page 1 of 1		Start Time:	12:40	End Time:	13:40	Page 1 of 1	
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9	0	0	0	0	0.0	9	0	0	0	0	0.0	9	0	0	0	0	0.0
10	0	0	0	0	0.0	10	0	0	0	0	0.0	10	0	0	0	0	0.0
11	0	0	0	0	0.0	11	0	0	0	0	0.0	11	0	0	0	0	0.0
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56	0	0	0	0	0.0	56	0	0	0	0	0.0	56	0	0	0	0	0.0
57	0	0	0	0	0.0	57	0	0	0	0	0.0	57	0	0	0	0	0.0
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6-minute average maximum

6-minute average maximum

6-minute average maximum