



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



DAN WYANT
DIRECTOR

November 10, 2014

Mr. Mark Kenworthy
Brembo North America, Inc.
29991 M-60 East
Homer, Michigan 49245

SRN: N6226, Calhoun County

Dear Mr. Kenworthy:

VIOLATION NOTICE

On October 21, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Brembo North America, Inc. (Brembo), located at 29991 M-60 East, Homer, Michigan. The purpose of this inspection was to determine Brembo's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and the conditions of Permit to Install (PTI) No. 145-12A.

During the inspection, staff of the DEQ, AQD, observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-Geomet; FG-Magni&Black; FG-Zinc	SC VIII.1-6 (FG-GeoMet; FG-Magni&Black) SC VIII.1-8 (FG-Zinc)	Exhaust gases from these stacks are required to be discharged unobstructed, vertically upwards, to the ambient air. During the inspection, it was noted that multiple coating exhaust stacks were fitted either with rain protection caps or vented downwards towards the building roof.
FG-Geomet; FG-Magni&Black; FG-Zinc	SC IV.2	Brembo does not have test caps available to verify that design requirements are met for the HVLP spray applicators.
FG-Geomet; FG-Magni&Black; FG-Zinc	SC IX.1, 40 CFR 63.3910(b)	Brembo has not submitted an initial notification report per 40 CFR, Part 63, Subpart Mmmm, which was due within 120 days of installation of EU-Zinc-05-Blechtopf or April 18, 2014.

The existing coating lines are also subject to the federal Nation Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. These standards are found in 40 CFR, Part 63, Subpart Mmmm.

Mr. Mark Kenworthy
Page 2
November 10, 2014

By January 15, 2015, please complete and submit the results of a physical roof inventory of the 13 existing coating line exhaust stacks. The report should include a roof outline map that identifies each coating line exhaust stack ID and a table that identifies each stack; the maximum stack exhaust diameter, the minimum stack height above ground level, and whether the stack exhaust discharges unobstructed, vertically upwards, to the ambient air. For any exhaust stacks that do not meet the stack/vent restrictions in Section VIII of PTI No. 145-12A, Brembo shall provide a date by which the stack will be modified in order to meet the permit requirements.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 1, 2014 (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.

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.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Brembo. 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

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ