



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 2, 2017

Mr. Jessy Conard
Brembo North America Inc.
47765 Halyard Drive
Plymouth, Michigan 48170

SRN: N6226, Calhoun County

Dear Mr. Conard:

VIOLATION NOTICE

On July 18, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Brembo Foundry (Facility), located at 6259 30 Mile Road, Homer, Michigan. The purpose of this inspection was to determine the Facility'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 Air Pollution Control Rules; and the conditions of Permit to Install No. 199-14A.

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

Process Description	Rule/Permit Condition Violated	Comments
EU-FINISHING	Condition III.1	Failure to submit a Malfunction Abatement Plan (MAP) to the AQD within 60 days of installation.
EU-COREMAKING	Condition III.1	Failure to submit a MAP to the AQD within 60 days of installation.
EU-COREMAKING	Condition IV.1	Failure to maintain acid scrubber liquid level above minimum tank level in accordance with manufacturer's recommendations based on PLC alarm message.
EU-COREMAKING	Condition IV.2 and VI.5	Failure to monitor pressure drop and liquid flow rate parameters from the acid scrubber controls. Failure to monitor and record pressure drop, liquid flow rate, and pH on a continuous basis.
EU-COREMAKING	Condition IV.5	Failure to maintain pH below 4.5 S.U. as required by the permit condition. At the time of the inspection, the pH reading was 9.06 S.U.

EU-COREMAKING	Condition VI.6	Facility was unable to provide a hard copy of the most recent quarterly inspection report for the acid scrubber system following the inspection.
EU-ENGINE1	Condition VIII.1	Permit condition requires stack exhaust to discharge unobstructed vertically upwards to the ambient air. The engine exhaust stack is equipped with a rain protection cap that does not allow the stack exhaust to meet the requirements of this permit condition.
FGMELTING	Condition III.1	Failure to submit a MAP to the AQD within 60 days of installation.
FGPOURCOOL	Condition III.1	Failure to submit a MAP to the AQD within 60 days of installation.
FGSANDHNDLG	Condition III.1	Failure to submit a MAP to the AQD within 60 days of installation.
FGMACTEEEEEE	Condition III.1	Failure to submit an Operation and Maintenance Plan to the AQD upon startup of affected equipment.
FGMACTEEEEEE	Condition VI.6	Failure to monitor at all times the combined 3-hour average volatile organic hazardous air pollutant (VOHAP) concentration from applicable cooling and shakeout lines. Currently, the cooling continuous emission monitoring system (CEMS) and shakeout CEMS present instantaneous VOHAP concentrations on the analyzer screen and data values are recorded to a memory card. Data is transferred periodically from the memory card to another computer and a program is then used to calculate the 3-hour flow weighted average VOHAP concentration from each line. Facility has purchased a SCADA system that still needs to be programmed to calculate a combined 3-hour flow weighted average VOHAP concentration.

Mr. Jessy Conard
Page 3
August 2, 2017

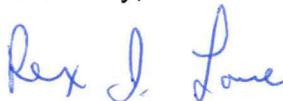
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 23, 2017 (which coincides with 21 calendar days from the date of this letter).

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 the Facility 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 the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility 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: Mr. Daniel Sandberg, Brembo
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ