



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



KEITH CREAGH  
DIRECTOR

June 28, 2016

Mr. Daniel Sandberg  
Brembo North America, Inc.  
47765 Halyard Drive  
Plymouth, Michigan 48170

SRN: N6226, Calhoun County

Dear Mr. Sandberg:

**VIOLATION NOTICE**

On June 23, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an unannounced site visit of Brembo foundry (Facility), located at 29991 M-60 East, Homer, Michigan. The purpose of this site visit was to determine whether startup of the Facility had occurred pursuant to 40 Code of Federal Regulations (CFR), Part 63, Subpart EEEEE. Per 40 CFR 63.2, startup means the setting into operation of an affected source or portion of an affected source for any purpose.

During the site visit, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUSHAKEOUT/ FGMACTEEEEEE	40 CFR Part 63, Subpart EEEEE; 40 CFR 63.7740(h); Permit to Install No. 199-14, FGMACTEEEEEE, Condition VI.6	For one or more automated conveyor and pallet cooling lines, and automated shakeout lines at a new iron and steel foundry subject to the volatile organic hazardous air pollutants (VOHAP) emission limit in 63.7690(a)(10), the owner or operator must at all times monitor the 3-hour average VOHAP concentration using a continuous emission monitoring system (CEMS) according to the requirements of 63.7741(g). Continuous monitoring and recording of cooling emissions for VOHAP commenced on May 24, 2016 following initial startup of the new iron foundry on April 28, 2016. The Facility has not installed CEMs on the shakeout process.

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This process is also subject to the federal Nation Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries. These standards are found in 40 CFR, Part 63, Subpart EEEEE. The Facility has charged, melted, and poured from one or more furnaces on and after April 28, 2016; therefore, initial startup of the affected source occurred on April 28, 2016.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 19, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 violation cited above and for the cooperation that was extended to me during my site visit the Facility. If you have any questions regarding the violation 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

cc: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Heidi Hollenbach, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Mary Douglas, DEQ