

State Registration  
Number  
N6226

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N6226-2015a

**Brembo North America, Inc.**

SRN: N6226

Located at

29991 M-60 East, Homer, Calhoun County, Michigan 49245

Permit Number: MI-ROP-N6226-2015a

Staff Report Date: March 23, 2015

Amended Date: November 25, 2019

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

## TABLE OF CONTENTS

<b>March 23, 2015 STAFF REPORT</b>	<b>3</b>
<b>May 8, 2015 STAFF REPORT ADDENDUM</b>	<b>7</b>
<b>November 25, 2019 - STAFF REPORT FOR RULE 216(2) MINOR MODIFICATION</b>	<b>8</b>

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number

N6226

**RENEWABLE OPERATING PERMIT**

ROP Number

MI-ROP-N6226-2015

**March 23, 2015 STAFF REPORT**

**Purpose**

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for Air Pollution Control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

**General Information**

Stationary Source Mailing Address:	Brembo North America, Inc. 29991 M-60 East Homer, Michigan 49245
Source Registration Number (SRN):	N6226
North American Industry Classification System (NAICS) Code:	336340
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Initial Issuance
Application Number:	201400131
Responsible Official:	Dan Sandberg, President and CEO Brembo North America, Inc. 734-468-2100
AQD Contact:	Rex I. Lane, Senior Environmental Quality Analyst 269-567-3547
Date Application Received:	August 27, 2014
Date Application Was Administratively Complete:	September 11, 2014
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	March 23, 2015
Deadline for Public Comment:	April 22, 2015

## Source Description

Brembo North America, Inc. (Facility) receives rough cast automobile brake rotors and drums from outside suppliers, and dry mills these parts to specifications. Particulate emissions from the dry milling operations are routed to cartridge dust collectors that exhaust inside the Facility. Machined rotors are coated in 1 of 13 existing coating lines using high volume, low pressure automatic (robotic) sprayers. Dry filters are used to collect any overspray from the coating process.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) in the **2013** submittal.

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	not reported
Lead (Pb)	not reported
Nitrogen Oxides (NO <sub>x</sub> )	not reported
Particulate Matter (PM)	not reported
Sulfur Dioxide (SO <sub>2</sub> )	not reported
Volatile Organic Compounds (VOC)	45.4
<b>Individual Hazardous Air Pollutant (HAP) **</b>	
Xylene	12.04
Methanol	5.38
Ethylene Glycol	0.04
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>17.46</b>

\*\*As listed pursuant to Section 112(b) of the federal Clean Air Act.

In addition to the pollutants listed above that have been reported in MAERS, the potential to emit of Greenhouse Gases (GHG) in tons per year of CO<sub>2</sub>e (carbon dioxide equivalents) is less than 100,000. The CO<sub>2</sub>e is a calculation of the combined global warming potentials of six GHG (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride).

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

## Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-applicable Requirements section of the Staff Report and identified in Part E of the ROP.

The stationary source is located in Calhoun County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is equal to or more than 25 tons per year.

No emissions units at the stationary source are currently subject to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit of volatile organic compounds was less than 250 tons per year.

EU-GeoMet-01, EU-GeoMet-02, EU-Black, EU-Magni-01, EU-Magni-02, EU-Magni-03, EU-Magni-04, EU-Magni-05, EU-Zinc-01, EU-Zinc-02, EU-Zinc-03, EU-Zinc-04, and EU-Zinc-05-Blechtopf at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products promulgated in 40 CFR, Part 63, Subparts A and MMMM.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

No emission units are subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

Please refer to Parts B, C, and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

**Source-wide Permit to Install (PTI)**

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

**Streamlined/Subsumed Requirements**

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

**Non-applicable Requirements**

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

**Processes in Application Not Identified in Draft ROP**

The following table lists processes that were included in the ROP Application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
EU-HEATERS	Natural gas fired air make-up units, space heaters, and water heaters.	R336.1212(4)(b)	R336.1282(b)(i)

### **Draft ROP Terms/Conditions Not Agreed to by Applicant**

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

### **Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

### **Action Taken by the MDEQ, AQD**

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Ms. Mary Douglas, Kalamazoo District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

Michigan Department of Environmental Quality  
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**May 8, 2015 STAFF REPORT ADDENDUM**

MI-ROP-N6226-2015

**Purpose**

A Staff Report dated March 23, 2015, was developed in order to set forth the applicable requirements and factual basis for the draft ROP terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	Dan Sandberg, President and CEO 734-468-2100
AQD Contact:	Rex I. Lane, Senior Environmental Quality Analyst 269-567-3547

**Summary of Pertinent Comments**

No pertinent comments were received during the 30-day public comment period.

Michigan Department of Environment, Great Lakes, and Energy  
Air Quality Division

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**RENEWABLE OPERATING PERMIT**

**November 25, 2019 - STAFF REPORT FOR RULE  
216(2) MINOR MODIFICATION**

ROP Number

MI-ROP-N6226-  
2015a

**Purpose**

On July 8, 2015, the Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-N6226-2015 to Brembo North America, Inc. pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(2).

**General Information**

Responsible Official:	Daniel M. Sandberg, President and CEO 734-468-2111
AQD Contact:	Caryn Owens, Environmental Engineer 231-878-6688
Application Number:	201800084
Date Application for Minor Modification was Submitted:	June 25, 2018

**Regulatory Analysis**

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to Rule 216(2).

**Description of Changes to the ROP**

Minor Modification Application Number 201800084 was to Incorporate PTI 145-12B into the ROP which was to add two paint lines in the ROP ("GeoMet 3" and "Zinc 6"), and to change the VOC emission limits for existing flexible groups in the ROP for their disk coating plant. Additionally, FG-Magni&Black was changed to FG-BMG-S1, and FG-COATINGLINES-S1 was added to cover all the coating lines at the facility, therefore, FG-MISCMETAL was removed from the ROP since it only covered two emission units that were limited to 10 tons per year each, and was less than the 30 tons per year for "all metal parts coating lines per R 336.1621(10)(b). PTI 145-12B was not required to go through the public participation process.

**Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

**Action Taken by the EGLE**

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-N6226-2015, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the United States Environmental Protection Agency (USEPA) has been allowed 45

days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.