



Sent Via E-mail & FedEx this Date

January 30, 2017

Rex Lane
Senior Environmental Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division
Kalamazoo District
7953 Adobe Road
Kalamazoo, MI 49009-5026

**RE: Brembo North America, Inc. – Homer Foundry
AQD Source ID (SRN): N6226
Violation Notice Response**

Dear Mr. Lane:

Brembo North America, Inc. (Brembo or the company) is submitting this letter in response to the MDEQ's Violation Notice dated January 9, 2017 (VN). At this time, the company is providing below the written response elements specified in the VN.

1. Dates the alleged violation occurred.

The emission limit violations are alleged to have occurred are October 19-20, 2016.

2. Explanation of the causes and duration of the alleged violation.

At this time, the December 16, 2016 test report (the "test report") and associated foundry operating data are under review. Through the review process Brembo hopes to gain insight into the likely causes and duration of the alleged emission limit violations.

3. Whether the alleged violation is ongoing.

The test report is still under review; therefore, Brembo is not in a position at this time to assess whether or not the alleged emission limit violations are ongoing.

4. Summary of the actions that have been taken and are proposed to be taken to correct the alleged violation and the dates by which these actions will take place.

Brembo will be undertaking the following actions related to the matters expressed in the VN.

Action No.	Description	Tentative Timeframe
1	Complete detailed technical review of December 16, 2016 test report and associated foundry operating data.	February

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north america

2	Develop site-specific emission factors for certain emission units based on test report and foundry operating data.	February
3	Develop revised emission estimates for the entire foundry and prepare associated PTI amendment strategy.	February
4	Convene a pre-application meeting with MDEQ to review revised emission estimates and PTI amendment strategy.	March
5	Prepare/submit PTI amendment application.	March

The foregoing timeframes are based on the information currently available to Brembo and are subject to change.

5. Steps being taken to prevent a reoccurrence.

Once issued, the amended PTI referenced above will, in effect, prevent recurrence of the alleged emission limit violations.

In addition to the foregoing, the company acknowledges MDEQ's position that facility wide re-testing will be required in 2017 in order to meet the requirements of Rule 336.2003(3).

Brembo looks forward to working closely with MDEQ to address the matters expressed in the VN. If you have any questions related to the information provided herein please contact me directly at (734) 468-2092 or jconard@us.brembo.com.

Sincerely,
Brembo North America, Inc.

Jessy L. Conard
Safety, Health and Env. Manager

cc: Dan Sandberg, Vivian Rowles (via e-mail)
Mark Jacobs – Dykema (via e-mail)
Chris Blume – RPS GaiaTech (via e-mail)

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