



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYHER
DIRECTOR

August 29, 2018

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

SRN: N6226, Calhoun County

Dear Mr. Conard:

VIOLATION NOTICE

The Department of Environmental Quality (DEQ), Air Quality Division (AQD), is in receipt of the August 15, 2018, test report submitted by Brembo North America, Inc. (Facility) for their foundry operations located at 29991 M-60 East, Homer, Michigan. The emission testing was performed April 23-26, 2018 (EUSHAKEOUT, FGPOURCOOL, FGSANDHANDLG and FGMELTING), and June 5, 2018, (FGSANDHNDLG; VOC RATA) to determine compliance with Permit to Install (PTI) No. 199-14A.

Based on a review of the emission test report, staff of the AQD noted the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUSHAKEOUT	PTI No. 199-14A, Condition I.3	Volatile organic compounds (VOC) emission limit is 3.19 pounds/hour. The average tested rate was 14.85 pounds/hour.
FGMELTING	PTI No. 199-14A, Condition I.3	Particulate matter (PM)10 emission limit is 1.23 pounds/hour. The average tested rate was 3.14 pounds/hour.
FGMELTING	PTI No. 199-14A, Condition I.5	PM 2.5 emission limit is 1.23 pounds/hour. The average tested rate was 1.86 pounds/hour.
FGPOURCOOL	PTI No. 199-14A, Condition I.1	PM emission limit is 0.24 pounds/hour. The average tested rate was 0.37 pounds/hour.

FGPOURCOOL	PTI No. 199-14A, Condition I.3	PM10 emission limit is 0.75 pounds/hour. The average tested rate was 0.85 pounds/hour.
FGPOURCOOL	PTI No. 199-14A, Condition I.5	PM2.5 emission limit is 0.75 pounds/hour. The average tested rate was 0.85 pounds/hour.
FGPOURCOOL	PTI No. 199-14A, Condition I.7	Carbon monoxide emission limit is 10.44 pounds/hour. The average tested rate was 12.53 pounds/hour.
FGPOURCOOL	PTI No. 199-14A, Condition I.9	VOC emission limit is 1.44 pounds/hour. The average tested rate was 2.84 pounds/hour.
FGPOURCOOL	PTI No. 199-14A, Condition IV.3	Condition requires a minimum VOC destruction efficiency (DE) for the regenerative thermal oxidizer of 95% by weight. The average DE test rate was 77.7%.
FGSANDHNDLG	PTI No. 199-14A, Condition I.3	PM10 emission limit is 2.3 pounds/hour. The average tested rate was 13.73 pounds/hour.
FGSANDHNDLG	PTI No. 199-14A, Condition I.5	PM2.5 emission limit is 1.58 pounds/hour. The average tested rate was 11.48 pounds/hour.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 19, 2018 (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.

Please submit the written response to the DEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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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. 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

cc: Mr. Daniel Sandberg, Brembo
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Mary Douglas, DEQ

