

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Brembo North America / Woodworth, Inc. - Homer	SRN : N6226
Location : [Brembo] 29991 M 60 EAST [Woodworth] 29753 M 60 EAST	District : Kalamazoo
	County : CALHOUN
City : HOMER State: MI Zip Code : 49245	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Rex Lane
FCE Begin Date : 8/1/2016	FCE Completion Date : 8/1/2017
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/18/2017	Self Initiated Inspection	Non Compliance	Self Initiated Inspection
07/18/2017	Self Initiated Inspection	Non Compliance	Self Initiated Inspection
04/27/2017	MACT (Part 63)	Compliance	40 CFR Part 63, Subpart EEEEE Report contains results of visible emissions testing that is required to be conducted not less than once every six months to demonstrate compliance with 40 CFR 63.7690(a)(7) for fugitive emissions. VE testing was conducted on 4/18/2017 and all opacity readings were 0%. Foundry PTI No. 145-12A has not yet been rolled into the Brembo Disc Plant ROP so an ROP certification report was not included with this report. -RIL
04/17/2017	Telephone Notes	Non Compliance	Conference Call: ROP Significant Modification Application and MAERS

Activity Date	Activity Type	Compliance Status	Comments
03/17/2017	ROP Annual Cert	Non Compliance	<p>ROP certification report contains an original dated signature by the facility's responsible official. The report identifies two continuing deviations associated with FG-GEOMET and FG-Black&Magni and exceedance of their respective 12-month rolling average VOC limits. AQD staff have previously cited the facility for these exceedances and the facility has been referred for escalated enforcement. Staff scanned the certification report and emailed it to the AQD enforcement specialist, Jason Wolf, for enforcement case development purposes. A violation notice will not be sent for this certification report since it is a continuing violation and will eventually be addressed by an administrative consent order or judgment. -RIL</p>
03/17/2017	ROP SEMI 2 CERT	Non Compliance	<p>ROP certification report contains an original dated signature by the facility's responsible official. The report identifies two continuing deviations associated with FG-GEOMET and FG-Black&Magni and exceedance of their respective 12-month rolling average VOC limits. AQD staff have previously cited the facility for these exceedances and the facility has been referred for escalated enforcement. Staff scanned the certification report and emailed it to the AQD enforcement specialist, Jason Wolf, for enforcement case development purposes. A violation notice will not be sent for this certification report since it is a continuing violation and will eventually be addressed by an administrative consent order or judgment. -RIL</p>

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03/17/2017	MAERS		<p>MAERS: ROP Certification Report</p> <p>ROP certification report contains an original dated signature by the facility's responsible official. The MAERS report was received electronically by the AQD on 3/13/17. AQD staff have failed the MAERS audit for Brembo's 2016 emissions report for the following reasons:</p> <ul style="list-style-type: none"> • Report does not address emissions from Brembo's foundry (PTI No. 199-14A) which commenced operations during calendar year (CY) 2016; • Report does not address emissions from the adjacent heat treating facility (Woodworth: PTI No. 64-15A) which commenced operations during CY 2016 and is part of the same major stationary source; • Report does not include emissions from Rule 290 or 287(c) exempt coating lines that may have operated during CY 2016 at the disc coating facility; <p>AQD staff left voice mail messages for Brembo's emissions inventory contacts and consultant who prepared the report noting that AQD has failed the MAERS audit. -RIL</p>
02/08/2017	MACT (Part 63)	Non Compliance	<p>NESHAP Subpart EEEEE: Semi-annual Compliance Certification Report</p> <p>MACT report included an ROP certification report that contains an original dated signature by the facility's responsible official. The MACT report lists a total of five different reported deviations from the requirements of the federal regulation. Violation notices were sent previously for two of the deviations listed in the report. A violation notice will be sent on 2/9/17 for failure to continuously record bag leak detector sensor output as required by 40 CFR 63.7741A(b)(2). -RIL</p>

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02/06/2017	MACT (Part 63)	Compliance	<p>NESHAP Subpart Mmmm: 2nd Semi-annual Compliance Report (2016)</p> <p>Report includes an ROP certification report that has an original dated signature by the facility's responsible official. MACT report contains information that indicates the Magni Zinc coating formulation has changed since December 2015 to contain less HAPs content. All coatings now technically comply with the 2.6 pounds HAPs/gallon coating solids material compliant option (40 CFR 63.3891(a)), however the facility uses a reducer for the Worwag Zinc Dust coating that contains 2% HAPs by weight, therefore the facility is required to use the Emission Rate without add-on controls compliance option (40 CFR 63.3891(b)) to demonstrate compliance with coating HAPs limit. Per recordkeeping that was submitted with the MACT report, the rolling 12-month rolling average HAPs content is 1.7 pounds/gallon coating solids for December 2016 or about 65% of the MACT limit. Staff spot-checked the latest calculation results for December 2016 and derived a value that was approximately 3% higher which still allows for a large margin of compliance with the limit. -RIL</p>
11/10/2016	Stack Test Observation	Non Compliance	FGMELTING Emission Test - 11/10/16
10/19/2016	Stack Test Observation	Non Compliance	Emission Test: FGPOURCOOL; FGSANDHNDLG; EUSHAKEOUT
09/22/2016	Telephone Notes	Non Compliance	Sweet Seasons Orchard: 15787 Allman Road, Concord, MI 49237

Activity Date	Activity Type	Compliance Status	Comments
09/21/2016	ROP Semi 1 Cert	Non Compliance	<p>ROP Semi-annual Compliance Certification Report: 1/1/16 - 6/30/16</p> <p>Presently, ROP MI-ROP-N6226-2015 covers only brake rotor coating operations at Brembo. The Brembo foundry and Woodworth Inc. NSR permits are required to be incorporated into the ROP within one year of commencing operation (approximately late spring 2017). The facility reported two deviations during the reporting period for exceeding the 12-month VOC rolling average for FG-Geomet and FG-Magni&Black. MDEQ has previously cited the facility for these deviations and the facility was referred for enforcement action on 8/30/16. The certification report contains an original dated signature by the facility's responsible official. A second violation notice will not be sent at this time. -RIL</p>
09/16/2016	Meeting Notes	Non Compliance	Enforcement Meeting
08/02/2016	MACT (Part 63)	Non Compliance	<p>NESHAP Semiannual Compliance Report, Subpart EEEEE (6/15/16 - 6/30/16)</p> <p>ROP certification report contains an original dated signature by the facility's responsible official, however, the ROP for the disc plant has not yet been modified to include foundry operations under PTI No. 199-14A. Facility believes foundry did not become subject to 40 CFR Part 63, Subpart EEEEE until 6/15/16. MDEQ staff disagrees with this finding based on site visit and other information that suggest initial startup (as it is defined under 40 CFR Part 63, Subpart A) commenced on April 28, 2016. A violation notice was sent to the facility on 6/28/16 for non-compliance with 40 CFR 63.7740(h). -RIL</p>

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08/02/2016	MACT (Part 63)	Compliance	<p>NESHAP Semiannual Compliance Report, Subpart Mmmm (1/1/16 - 6/30/16)</p> <p>ROP certification report contains an original dated signature by the facility's responsible official. Spreadsheet attached to the report indicates rolling 12-month emission rate of 2.5 pounds HAP/gallon of coating solids. This is 96% of the allowable MACT limit (2.6). Facility has recently indicated that they will be submitting an NSR application to control some of their coating lines with activated carbon controls in order to maintain compliance with MACT limit. -RIL</p>

Name: RIL Date: 8/1/17 Supervisor: MA 8/1/2017