

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Brembo North America, Inc.		SRN : N6226
Location : 29991 M 60 EAST		District : Kalamazoo
		County : CALHOUN
City : HOMER	State: MI Zip Code : 49245	Compliance Status : Compliance
Source Class : MAJOR		Staff : Amanda Cross
FCE Begin Date : 1/1/22		FCE Completion Date : 8/18/2023
Comments :		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/09/2023	On-site Inspection	Compliance	
08/07/2023	MACT (Part 63)	Compliance	Subpart EEEEE NESHP Semiannual Compliance Report as required under 40 CFR 63.7751(a). Brembo submitted an ROP certification form with original signature and date of the responsible official. The facility did not report any deviations from emission limits, work practice standards, or operation and maintenance requirements during the reporting time period.
08/07/2023	Excess Emissions (CEM)	Compliance	Quarterly ROP, CEMS & EES Report The facility submitted the ROP certification with an original signature and date from the responsible official. The facility reported the RTO flow CEMs and RTO CEMs down for 1 hour or 0.05%, Sand flow CEMs down for 1 hour or 0.05%, and the Sand CEMs down for 2 hours or 0.09%, all for malfunctions. The total operational time was 2163 hours for this quarter. The facility also reported the results of the passing cylinder gas audit.

Activity Date	Activity Type	Compliance Status	Comments
07/27/2023	MACT (Part 63)	Compliance	<p>Subpart MMMM NESHAP Semiannual Compliance Report as required under 40 CFR 63.3920(a)</p> <p>in 63.3890(b)(1). Pound HAP/gal solids reported as follows:</p> <p>Magni 0.02 lb HAP/gal solids GeoMet 360 2.13 lb HAP/gal solids GeoMet 1102 2.55 lb HAP/gal solids Emulter 0.08 lb HAP/gal solids</p>
04/28/2023	ROP Qrtly Cert	Compliance	<p>The facility submitted the Quarterly ROP, CEMS, and EES report for the Foundry with an ROP certification form with original signature.</p> <p>The facility reports that the RTO THC CEMS flow meter was out of operation for 38 hours due to monitoring equipment malfunctions. This was the cumulative total of 6 different events over 2 days. Total downtime was 2.03%. The RTO CEMS, erroneously reported as a duplicate Sand CEMS on page 3 of the report says the CEMS was out of control for 2 hours, both for Malfunctions and one for Quality Assurance, totaling 0.1% downtime. The Sand CEMS Flow Meter was out for 0 hours and 0% downtime. The Sand CEMS was out of control for 2 hours, one for Malfunctions and one for Quality Assurance, totaling 0.1% downtime.</p>
03/23/2023	MAERS	Compliance	<p>The facility submitted an ROP Certification form with original signature and date of Responsible Official for the 2022 MAERS reporting submission.</p> <p>2022 MAERS report hardcopy certification submittal (attached) 2022 Supplemental Control spreadsheet submittal to INFOMAERS@Michigan.gov on 3/15/2023.</p>

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03/23/2023	ROP Annual Cert	Compliance	<p>The facility submitted an ROP certification form with original signature and date of the responsible official.</p> <p>Facility reports that during the entire reporting period, the source was in compliance with all terms and conditions contained in the ROP.</p>
03/23/2023	ROP SEMI 2 CERT	Compliance	<p>The facility submitted an ROP certification form with original signature and date of the responsible official.</p> <p>The facility reported that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms occurred.</p>
03/23/2023	ROP Annual Cert	Non Compliance	<p>The facility submitted an ROP certification form with original signature and date of the responsible official.</p> <p>The facility is not technically rolled into the ROP so this is not an official ROP report. The intent is that they will be rolled into the ROP as soon as a new PTI is issued to the facility to address ongoing emission limit violations.</p> <p>The facility reports that there is an ongoing emission limit exceedance on EU-FINISHING PM2.5. A PTI has been submitted to update this limit. All noted deviations have been previously reported to the department in quarterly reports.</p>

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03/23/2023	ROP SEMI 2 CERT	Compliance	<p>The facility submitted an ROP certification form with original signature and date of the responsible official.</p> <p>The facility is not technically rolled into the ROP so this is not an official ROP report. The intent is that they will be rolled into the ROP as soon as a new PTI is issued to the facility to address ongoing emission limit violations. All noted deviations have been previously reported to the department in quarterly reports.</p>
01/30/2023	MACT (Part 63)	Compliance	<p>Subpart Mmmm NESHAP Semiannual Compliance Report as required under 40 CFR 63.3920(a)</p> <p>The facility reports that all coatings are compliant with the NESHAP Mmmm lb HAP/gal solids limit in 63.3890(b)(1). Pound HAP/gal solids reported as follows:</p> <p>Magni 0.02 lb HAP/gal solids GeoMet 360 2.13 lb HAP/gal solids GeoMet 1102 2.55 lb HAP/gal solids Emulter 0.08 lb HAP/gal solids</p>
01/30/2023	CEM RATA	Compliance	<p>Facility submitted RATA results for the 3rd quarter, in lieu of the CGA, as required by the facility's current permit. Results are as follows:</p> <p>RTO Flow rate: 14.72% kdscfm (limit - 20%) Total Hydrocarbons: 1.33% ppm wet (limit - 20%)</p> <p>Sand System Flow rate: 7.86% kdscfm (limit - 20%) Total Hydrocarbons: 15.85% ppm wet (limit - 20%)</p>

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01/30/2023	ROP Qrtly Cert	Compliance	<p>The facility submitted an ROP certification form with original signature and date from the responsible official. The facility reported the following:</p> <ul style="list-style-type: none"> - PTI 199-14C requires the RTO temperature data to be recorded. While the RTO and CEMs were operating normally during the entire period, a data logger failed and temperature data from November 28 to December 21 were lost. Verbal notification was given to EGLE. The data storage unit was restored and the system had a data alarm added to ensure quick notification if temperature readings do not write to the storage device. - As reported in Q3, emissions testing on July 28th indicated a deviation of the hourly PM2.5 emission limit on EUFINISHING. This is being addressed with an emission limit increase and an ACO.
01/30/2023	Excess Emissions (CEM)	Compliance	<p>The facility submitted a quarterly CEMS EER with an ROP certification form with original signature and date. A previously reported emissions exceedance on PM2.5 on EUFINISHING is ongoing. A new PTI application has been submitted and the associated ACO is out for public comment.</p> <p>The facility reported the RTO CEMS had a downtime of 0.85%, RTO flow meter downtime was 0.74%, Sand CEMs downtime was 0.94%, and sand flow meter downtime was 0.99%. No excess emissions were reported.</p>
01/30/2023	MACT (Part 63)	Compliance	<p>Subpart EEEEE NESHAP Semiannual Compliance Report as required under 40 CFR 63.63.7751(a). The facility submitted an ROP certification form with an original signature and date. No deviations of the MACT EEEEE were reported.</p>

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12/15/2022	ROP Qrtly Cert	Compliance	The facility submitted a quarter ROP certification, CEMS, and EER with an original signature and date of the new RO. The facility reported no new deviations beyond the already documented ongoing exceedance of PM2.5 on the EUFINISHING line.
12/15/2022	Excess Emissions (CEM)	Unknown	<p>The facility submitted a quarterly CEMS EER with an ROP certification form with original signature and date.</p> <p>The facility reported the RTO CEMS (erroneously as the Sand CEMS Serial #2104032) with a downtime of 1.67%, RTO flow meter downtime 6.85%, Sand CEMs downtime of 3.84%, and sand flow meter downtime of 5.39%. This is being evaluated by TPU. No excess emissions were reported.</p>
12/06/2022	Stack Test Observation	Compliance	
10/20/2022	MACT (Part 63)	Compliance	The facility had Impact Compliance and Testing complete the Method 9 required readings. No visible emissions were seen during the observation period.

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10/20/2022	Stack Test	Non Compliance	<p>2022 FGMELTING & EUFINISHING REPORT, emissions testing conducted July 26-28, 2022.</p> <p>The facility submitted an ROP certification form with signature and date. Reporting showed the following results:</p> <p>EUFINISHING PM2.5 limit 0.05 lbs/hr and Tested 0.1582 lbs/hr PM10 limit 0.54 lbs/hr and Tested 0.2207 lbs/hr PM limit 4.05 lbs/hr and Tested 0.2761 lbs/hr</p> <p>FGMELTING MACT Limit 0.001 grains/dscf and Tested 0.000233 gdscf</p> <p>FGMELTING PM2.5 limit 1.65 lbs/hr and Tested 0.8765 lbs/hr PM10 limit 2.18 lbs/hr and Tested 1.206 lbs/hr PM limit 2.20 lbs/hr and Tested 1.3114 lbs/hr</p>
10/06/2022	ROP Other	Compliance	<p>The facility submitted the semi-annual report for visible emissions, as required by 40 CFR Part 63 Subpart EEEEE.</p> <p>The fugitive VE opacity observations were performed for three (3) continuous hours (30, 6-minute averages) on October 6, 2022. Observations were recorded at 15-second intervals. No visible emissions were observed during the observation period (all recorded values are 0%).</p>
09/22/2022	ROP Other	Compliance	<p>The facility submitted a Rule 215 (3) ROP notification to add new line 29 (machining and spindle-less painting), which is exempt pursuant to Rule 285(2)(l)(vi)(B) and Rule 287(2)(c), and line 30 (machining only), which is exempt per Rule 285(2)(l)(vi)(B).</p>

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09/22/2022	ROP Other	Compliance	The facility submitted an ROP certification form with original signature of responsible official and date. This facility will eventually be subject to the ROP requirements, but as of yet, has to be rolled into the ROP. The facility reported that the RTO CEMs was inoperable for 118 hours or about 6.5% of the operable time. The facility also reported that the sand system CEMs was inoperable for about 11 hours or about 1% of the operable time. These were all previously reported in the quarterly reporting requirements.
09/22/2022	ROP Semi 1 Cert	Compliance	The facility submitted an ROP certification form with original signature from the responsible official and date. The facility certifies that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements, or any other terms, or conditions occurred.
08/11/2022	ROP Qrtly Cert		The facility submitted an ROP Certification Form with original signature from RO and date. The facility had previous reported a deviation of emission limits of the ROP and a VN was issued. There is ongoing negotiation for a settlement and ACO between the facility and department. There were no additional ROP deviations identified during the reporting period.

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08/11/2022	Excess Emissions (CEM)	Compliance	<p>The facility submitted an ROP Certification Form that had an original signature and date. The facility reported 1 hour or 0.05% downtime for the Sand CEMs and Sand CEMs Flow Meter due to a monitoring equipment malfunction. The facility reported 1 hour or 0.05% downtime for the RTO CEMs and RTO CEMs flow meter due to a monitoring equipment malfunction.</p> <p>The facility also included this quarter's CGA report. The RTO-THC low gas error was 3.64 and mid-gas error was 4.99. Shakeout-THC low gas error was 0.90 and mid-gas error was 0.30. All are passing results.</p> <p>No excess emissions occurred during the reporting period.</p>
08/11/2022	MACT (Part 63)	Compliance	<p>Subpart EEEEE NESHAP Semiannual Compliance Report as required under 40 CFR 63.63.7751(a). The facility submitted an ROP certification form with an original signature and date. No deviations of the MACT EEEEE were reported.</p>
08/03/2022	MACT (Part 63)	Compliance	<p>Subpart MMMM NESHAP Semiannual Compliance Report as required under 40 CFR 63.3920(a)</p> <p>The facility reports that all coatings are compliant with the NESHAP MMMM lb HAP/gal solids limit in 63.3890(b)(1). Pound HAP/gal solids reported as follows:</p> <p>Magni 0.02 lb HAP/gal solids GeoMet 360 2.13 lb HAP/gal solids GeoMet 1102 2.55 lb HAP/gal solids Emulter 0.08 lb HAP/gal solids</p>
07/26/2022	Stack Test Observation		

Activity Date	Activity Type	Compliance Status	Comments
05/19/2022	Excess Emissions (CEM)	Compliance	<p>The facility submitted an ROP report certification form with an original signature from the responsible official and date. The facility submitted the following reports:</p> <ul style="list-style-type: none"> Quarterly Report Excess Emissions Report CEMS Report <p>The facility reports no ROP deviations during the reporting period. Based on the monthly emissions calculations and tracking, there were no excess emissions events during the reporting period. Also, based on a review of the CEMs data, there were no excess emissions during the reporting period.</p> <p>The facility also reports that the RTO CEMs was down for 23 hours during the reporting period, 4 hours for malfunctions and 19 hours for known causes for a total of 1.12% of operating time. The flow meter was down for 4.52% of the run time. Sand system CEMs was down for a total of 5 hours for malfunctions or 0.24% of operating time. The flow meter was down for 4 hours or 0.19% of operating time.</p>
04/27/2022	MAERS	Compliance	<p>2021 MAERS Report Hardcopy Certification Submittal 2021 MAERS Summary</p> <p>Facility submitted the 2021 MAERS Certification on an ROP certification form with original signature and date from the responsible official.</p>
03/22/2022	ROP Annual Cert	Compliance	<p>The facility submitted an ROP certification form with original signature and date. The facility states that during the entire reporting period, all terms and conditions contained in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.</p>

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03/22/2022	ROP SEMI 2 CERT	Compliance	The facility submitted an ROP certification form with original signature and date. The facility states that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
03/22/2022	ROP SEMI 2 CERT		The facility submitted an ROP certification with original signature and date. Facility is slated to be rolled into the ROP and is reporting as required by the MACT and in agreement with the Department. Facility reports there were deviations that were all previously reported to the department in the quarterly ROP, CEMs, and ESS reports. The foundry exceeded emission limits during testing completed in October, 2022. These have previously been recorded and a VN was sent for these exceedances.
03/22/2022	ROP Annual Cert	Unknown	The facility submitted an ROP certification with original signature and date. Facility is slated to be rolled into the ROP and is reporting as required by the MACT and in agreement with the Department. Facility reports there were deviations that were all previously reported to the department in the quarterly ROP, CEMs, and ESS reports. The foundry exceeded emission limits during testing completed in October, 2022. These have previously been recorded and a VN was sent for these exceedances.
02/25/2022	MACT (Part 63)	Compliance	SUBPART MMMM NESHAP Semiannual Compliance Report as required under 40 CFR 63.3920.(a). The facility submitted an ROP certification form with an original signature and date. The facility reports no deviations from the NESHAP MMMM requirement of 2.6 lb HAP/gallon of solids.

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02/25/2022	MACT (Part 63)	Compliance	<p>Subpart EEEEE NESHAP Semiannual Compliance Report as required under 40 CFR 63.63.7751(a). The facility submitted an ROP certification form with an original signature and date. The facility did report a deviation of the emission limit 0.001 gr/dscf referenced in 63.7690(a)(4)(i) as determined by emissions testing. A VN was sent for this deviation amongst others stemming from emissions testing.</p> <p>No other deviations of the MACT EEEEE were reported.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/22/2022	Stack Test	Compliance	<p>The facility submitted stack testing results for testing conducted December, 8, 15, and 17 on the FGSANDHNDLG and FGPOURCOOL emission units. This was part of the testing conducted in October with results submitted previously for the other two tested emission units. Results are as follows:</p> <p>FGSANDHNDLG Total PM: 4.35 lb/hr Emission Limit: 14.41 lb/hr Total PM10: 3.24 lb/hr Emission Limit: 16.02 lb/hr Total PM2.5: 2.33 lb/hr Emission Limit: 13.31 lb/hr</p> <p>FGPOURCOOL Total PM: 0.29 lb/hr Emission Limit: 0.88 lb/hr Total Hydrocarbons as Hexane: 1.70 lb/hr Emission Limit: 3.37 lb/hr RTO Inlet Destruction Efficiency: 85.82% Emission Limit 94%</p> <p>FGMACTEEEEEE - New Pouring Station Total PM: 0.0006 gr/dscf Emission Limit: 0.002 gr/dscf</p> <p>The facility appears to have met all the emission limits for FGSANDHNDLG and FGPOURCOOL as well as the MACTEEEEEE limits. The facility did pass on the total hydrocarbons but not on destruction efficiency. The permit requires them to pass on one or the other.</p>
02/10/2022	ROP Qrtly Cert	Non Compliance	<p>Facility submitted an ROP Certification form including original signature and date of the responsible official. The facility reports that emissions testing on October 26th indicated a deviation of the hourly PM2.5 and PM10 limits for EUFINISHING. Emissions testing on October 28th indicated a deviation of the hourly PM, PM10, and PM2.5 limits for FGMELTING. A VN was issued for these deviations previously.</p>

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02/10/2022	Excess Emissions (CEM)	Compliance	<p>The facility submitted an ROP certification form with an original signature and date from the responsible official. The facility reported exceedances in PM2.5 and PM10 limits for EUFINISHING and PM, PM10, and PM2.5 on FGMELTING. The facility reported the following for the CEMS:</p> <p>The Sand CEMS experienced 0 hours of excess emissions and 30 hours for monitoring equipment malfunctions totaling 1.65% of CEMs downtime. The RTO CEMS experienced 0 hours of excess emissions and 180 hours for monitoring equipment malfunctions and 1 for other known causes for 181 hours of total downtime or 9.67% of total operational time.</p>
01/03/2022	Stack Test	Non Compliance	<p>The company submitted the 2021 Stack Testing Results for the scheduled Stack Testing event in October, 2021. Results were submitted for EUFINISHING and FGMELTING. Results are as follows:</p> <p>EUFINISHING Total PM2.5 - 0.0024 gr/dscf 0.61 lb/hr Emission Limit - 0.05 lb/hr Total PM10 - 0.0028 gr/dscf 0.72 lb/hr Emission Limit - 0.54 lb/hr Total PM - 0.0043 gr/dscf 1.13 lb/hr Emission Limit - 4.05 lb/hr</p> <p>FGMELTPOUR Total PM2.5 - 0.0030 gr/dscf 2.26 lb/hr Emission Limit - 1.65 lb/hr Total PM10 - 0.0037 gr/dscf 2.77 lb/hr Emission Limit - 2.18 lb/hr Total PM - 0.0047 gr/dscf 3.52 lb/hr Emission Limit - 2.20 lb/hr</p> <p>Facility appears to have exceeded the following emission limits: PM2.5 and PM10 for EUFINISHING and PM2.5, PM10, and PM for FGMELTING. Additionally the facility appears to have exceeded the MACT Emission limit of 0.001 gr/dscf PM for new electric induction melting furnaces contained in the FGMACTEmission table.</p>

Name: Amanda Cross

Date: 8/18/23

Supervisor: 