



# CORRECTIVE ACTION REQUEST

FM-EMS-4.5.3-02 CA Form

Rev. Date: 11-11-11

Element #: October 21, 2014 DEQ Inspection

Report Number: HSE 14-06

Date Issued: Nov. 20, 2014

FG-Geomet: FG-Magni & Black; FG-Zinc

Initiated By: MSK

Requirement: Exhaust gases from stacks are required to be discharged unobstructed, vertically upwards, to the ambient air.

Objective Evidence: During October 21, 2014 DEQ inspection it was noted that multiple coating exhaust stacks were fitted either with a rain protection caps or vented downwards towards the building roof.

Root Cause if known: Rain protection caps were not recognized as obstructing devices, believing that they were acceptable for use.

Corrective Action: Remove obstructing devices from coating exhaust stacks.

Quote to modify stacks due November 28, 2014

Repairs to be completed by February 01, 2015

Date CA Implemented:

Date CA Completed:

Verification Details:

Verification; was CA effective Yes No Name:

Date:

Date Closed:

Name:



# CORRECTIVE ACTION REQUEST

FM-EMS-4.5.3-02 CA Form

Rev. Date: 11-11-11

Element #: October 21, 2014 DEQ Inspection

Report Number: HSE 14-07

Date Issued: November 20, 2014

FG-Geomet: FG-Magni & Black; FG-Zinc

Initiated By: MSK

Requirement: Test caps must be available to verify the design requirements are met for the HVLP spray applicators

Objective Evidence: Test caps are not available to verify that the design requirements are met for the HVLP spray applicators

Root Cause if known: Our standard practice for controlling the spray applicators pressure was to use standard air regulators

Corrective Action: Test caps will be the new standard practice for verifying spray applicators

Quotes to purchase test caps due Dec. 10, 2014

Available for use by January 15, 2015

Date CA Implemented:

Date CA Completed:

Verification Details:

Verification; was CA effective Yes No Name:

Date:

Date Closed:

Name:



# CORRECTIVE ACTION REQUEST

FM-EMS-4.5.3-02 CA Form

Rev. Date: 11-11-11

Element #: October 21, 2014 DEQ Inspection

Report Number: HSE 14-08

Date Issued: November 20, 2014

FG-Geomet: FG-Magni & Black; FG-Zinc

Initiated By: MSK

Requirement: 40 CFR, Part 63, Subpart Mmmm requires a initial notification report within 120 days of installation of new coating lines

Objective Evidence: The initial notification report was not submitted to the DEQ for EU-Zinc-05-Blehtopf coating process

Root Cause if known: It was believed that the letter sent to Ms. Julie L. Brunner, P.E. in the Permit Section of the Air Quality Division on March 14, 2014 was sufficient for the initial notification.

Corrective Action: DEQ Initial Notification Report # EQP 3579 has been completed and submitted to Rex Lane, Senior Environmental Quality Analyst Air Quality Division

Date CA Implemented: November 24, 2014

Date CA Completed:

Verification Details:

Verification; was CA effective Yes No Name:

Date:

Date Closed:

Name:



**INITIAL NOTIFICATION REPORT**  
**National Emission Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subpart A §63.9**

**Applicable Rule:** 40 CFR Part 63 -National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A – General Provisions. Initial notification is being made in accordance with §63.9(b).

**Note:** Initial notification reports are due within 120 calendar days after the source becomes subject to the standard, except when otherwise specified in a particular subpart.

If you are a new or reconstructed major source, you must also include information required under 63.5(d) and 63.9(b)(5) in permit to Install application. You may use the Permit to Install application in lieu of this form as your initial notification. (§63.5(d)(1)(ii)).

**Please print or type all information.**

|  |   |                   |   |
|--|---|-------------------|---|
| <b>1. COMPLETE THIS SECTION FOR EACH PRODUCTION FACILITY. MAKE ADDITIONAL COPIES AS NECESSARY.</b> |   |                   |   |
| OWNER/OPERATOR<br>Brembo North America, INC.   |   |                   |   |
| COMPANY NAME<br>Brembo North America, INC.   |   |                   |   |
| EQUIPMENT LOCATION ADDRESS<br>29991 M-60 East  |   |                   |   |
| CITY<br>Homer  | STATE<br>MI   | ZIP CODE<br>49245 | COUNTY<br>Calhoun                                   |
| PLANT CONTACT, NAME AND TITLE<br>Mark Kenworthy HSE Manager  |   |                   | TELEPHONE AREA CODE & NUMBER<br>517-568-4398        |
| MAILING ADDRESS (if different from above)  | CITY  | STATE             | ZIP CODE  |
| Primary SIC Code/NAICS Code<br>336340  | RENEWABLE OPERATING OR AIR USE PERMIT NUMBER (If applicable)<br>145-12A |                   | STATE REGISTRATION NUMBER (SRN), if known<br>N6 226 |

|  |                                |
|--|--------------------------------|
| <b>2. Indicate the relevant standard or other requirement that is the basis for this notification and the source's compliance date: (§63.9(b)(2)(iii)). Refer to the attached MACT Summary table for correct Subpart and compliance dates for existing affected sources.</b> |                                |
| SUBPART MMMM   | COMPLIANCE DATE April 18, 2014 |

|   |
|---|
| <b>3. Briefly describe the nature, size, design, and method of operation of the source. (§63.9(b)(2)(iv))</b>   |
| <p>EU-Zinc-05-Blechtöpf zinc spray paint equipment / process.</p> <p>Automotive brake rotors are pre-heated to 50° C before coating, using a single induction unit; then transferred by rotary table into a paint booth where HVLP spray guns attached to robots(s) apply the coating to multiple surfaces of the brake disc.</p> <p>The spray-booth has entrance and exit air-seals to avoid the exit of solvent-loaded air, eliminating the need for a flash-off / drying area.</p> |

**INITIAL NOTIFICATION REPORT  
NESHAP 40 CFR Subpart A**

**4. Briefly describe the types of emission points within the affected source and the types of hazardous air pollutants emitted. (§63.9(b)(2)(iv))**

Spray coating process having the potential to release volatile organic compounds (VOC's), some of which are categorized as hazardous air pollutants (HAP's) into the ambient air.

Emission points are as follows:

Maximum exhaust diameter (Spray Booth) = 20 inches

Minimum height above ground (Spray Booth) = 40 feet

Maximum exhaust volume (Spray Booth) = 4,400 cfm.

Maximum exhaust diameter (Paint Supply Box) = 4 inches

Minimum height above ground (Paint Supply Box) = 40 feet

Minimum exhaust volume (Paint Supply Box) = 150 cfm.

**5. Check the box that applies**

My facility is a major source of Hazardous Air Pollutants (HAPs).

My facility is an area source of HAPS.

Note: A major source is a facility that emits or has the potential to emit greater than 10 tons per year of any one HAP or 25 tons per year of multiple HAPs. All other sources are considered to be area sources. The major/area source determination is based on all HAP emission points inside the facility fence line, not just inside the facility itself.

Michigan Department of Environmental Quality, Environmental Science and Services Division  
**INITIAL NOTIFICATION REPORT**  
**NESHAP 40 CFR Subpart A**

**6. CERTIFICATION**

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete.

**Print or type the name and title of the "Responsible Official" for the plant:**

|  |                   |                |
|--|-------------------|----------------|
| Dan Sandberg                                 | President and CEO | (734) 604-3601 |
| Name of Responsible Official (print or type) | Title             | Phone Number   |

\*A "Responsible Official" can be:

- The president, vice-president, secretary, or treasurer of the company who owns the plant
- The owner of the plant
- The plant engineer or supervisor
- A government official if the plant is owned by the Federal, State, City, or County government
- A ranking military officer if the plant is located on a military base

Signature of "Responsible Official"

Date

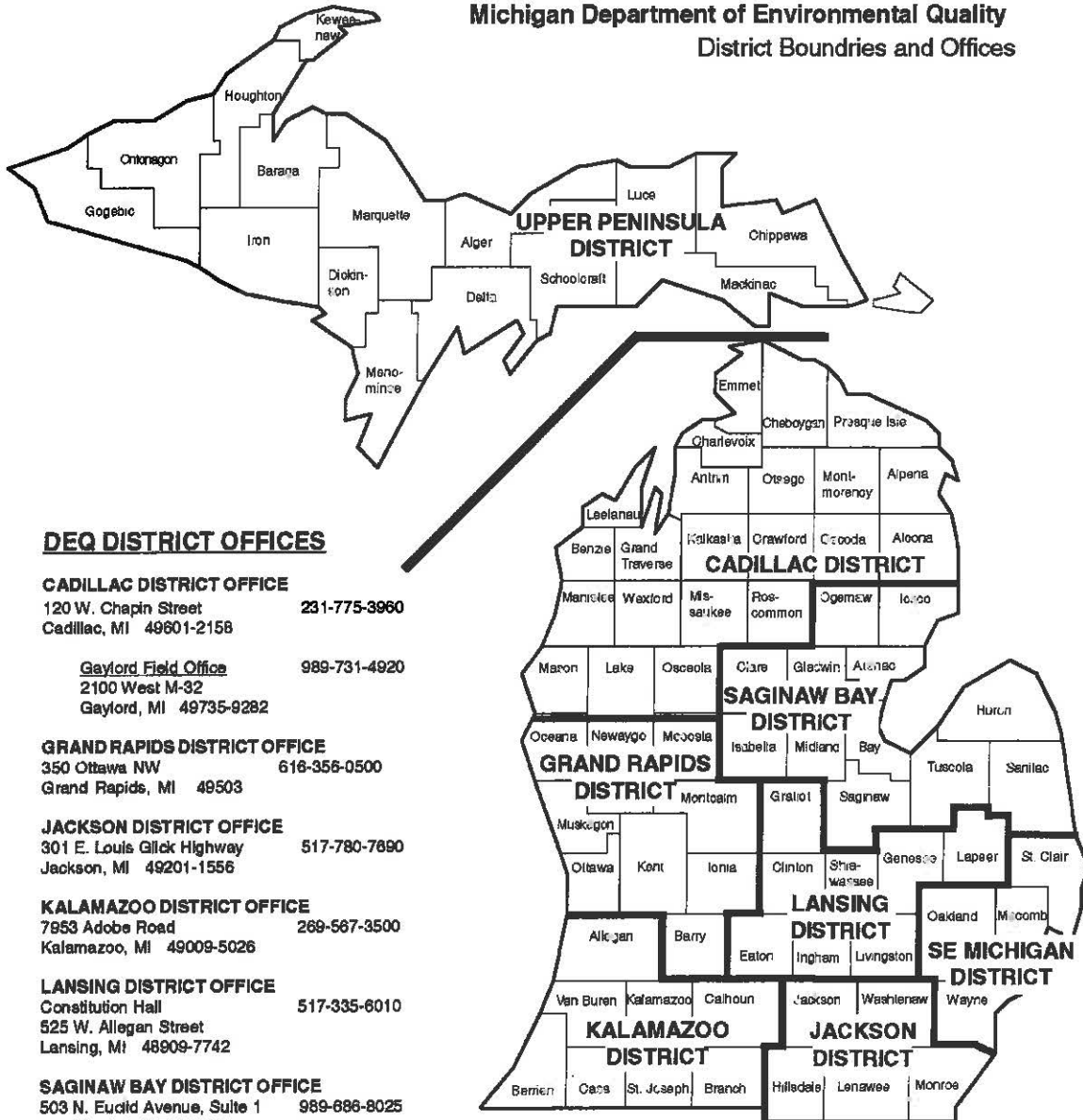
**Please make a copy of this Initial Notification Report and submit the original signed copy by U.S. mail, or by another courier, to the appropriate Air Quality Division district office (Attachment A) and a copy to the U.S. Environmental Protection Agency (USEPA) Region 5 office at the following address:**

USEPA Region 5  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, IL 60604-3507

**INITIAL NOTIFICATION REPORT  
NESHAP 40 CFR Subpart A**

**ATTACHMENT A  
Air Quality District and Office Boundaries**

**Michigan Department of Environmental Quality  
District Boundries and Offices**



**DEQ DISTRICT OFFICES**

**CADILLAC DISTRICT OFFICE**  
120 W. Chapin Street      231-775-3960  
Cadillac, MI 49601-2158

Gaylord Field Office      989-731-4920  
2100 West M-32  
Gaylord, MI 49735-9282

**GRAND RAPIDS DISTRICT OFFICE**  
350 Ottawa NW      616-356-0500  
Grand Rapids, MI 49503

**JACKSON DISTRICT OFFICE**  
301 E. Louis Glick Highway      517-780-7890  
Jackson, MI 49201-1556

**KALAMAZOO DISTRICT OFFICE**  
7953 Adobe Road      269-567-3500  
Kalamazoo, MI 49009-5026

**LANSING DISTRICT OFFICE**  
Constitution Hall      517-335-6010  
525 W. Allegan Street  
Lansing, MI 48909-7742

**SAGINAW BAY DISTRICT OFFICE**  
503 N. Euclid Avenue, Suite 1      989-686-8025  
Bay City, MI 48706-2925

**SOUTHEAST MICHIGAN DISTRICT OFFICE**  
27700 Donald Court      586-753-3700  
Warren, MI 48092-2793

Detroit Field Office      313-456-4700  
Cadillac Place  
3058 West Grand Boulevard, Suite 2-300  
Detroit, MI 48202-6058

**UPPER PENINSULA DISTRICT OFFICE**  
420 5th Street      906-346-8300  
Gwinn, MI 49841

**ENVIRONMENTAL ASSISTANCE CENTER**  
**(for general information):**  
Telephone: 800-662-9278  
Fax: 517-241-0673

**POLLUTION EMERGENCIES**  
Telephone: 800-292-4706

**DEQ WEB PAGE**  
[www.michigan.gov/deq](http://www.michigan.gov/deq)