

February 27, 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 February 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 bag leak detection system sensor output was not continuously recorded during sporadic intervals over the past 4 months.

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

During investigation, it was found that a fault in the Ethernet cable connecting the PLCs to Brembo's network was causing data not to be properly recorded. It was also found that initial programming by the manufacturer had not been completed correctly, which caused data to overwrite and not be continuously saved.

3. Whether the alleged violation is ongoing.

The violation is not ongoing. The violation was corrected on February 11, 2017

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 continue to monitor the recording process to ensure corrective actions taken have properly addressed the VN.

5. Steps being taken to prevent a reoccurrence.

Brembo has recently hired an Automation Engineer for our Homer Foundry. This has allowed us to properly correct the VN and put measures in place to prevent a reoccurrence.

BREMBO NORTH AMERICA, INC.

www.brembo.com
47765 Halyard Drive
Plymouth, MI 48170
Tel.: +1 (734) 468-2100
Fax: +1 (734) 468-2161



north america

The datalink connecting the bag house PLCs to Brembo's network is now being monitored and provides a real time notice of any interruption.

The PLC for the bag house is now being backed up with rest of PLCs on Brembo's network. All data is archived and backed-up daily.

Brembo considers all items associated with this VN satisfied and looks forward to working closely with MDEQ to close out this VN. If you have any questions related to the information provided herein please contact Jessy Conard directly at (734) 468-2092 or jconard@us.brembo.com.

Sincerely,

Brembo North America, Inc.

A handwritten signature in black ink that reads 'J. Conard'.

Jessy L. Conard
HSE Manager

cc: Daniel Sandberg (via e-mail)
Mark Jacobs – Dykema (via e-mail)
Chris Blume – RPS GaiaTech (via e-mail)