



*Sent Via E-mail & FedEx this Date*

November 10, 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 – Update**

Dear Mr. Lane:

This letter is in reference to the MDEQ's Violation Notice dated August 2, 2017 (VN). Brembo North America, Inc. (Brembo or the company) provided an initial response on August 23, 2017, then an updated response on September 5<sup>th</sup>, 2017. This letter is to provide an updated response to information contained in the previous responses.

In response to the various equipment maintenance and operating plans, Brembo has completed revision and finalized the working drafts of the following plans:

- Cooling baghouse malfunction abatement plan
- Finish baghouse malfunction abatement plan
- RTO integrated plan
- Melt shop baghouse integrated plan
- Sand system baghouse malfunction abatement plan
- Shakeout CEMS integrated plan

As required, Brembo is providing official hard copies of the above plans with this letter. Please accept this letter and contents as our official notification and submittal of documentation for these updated plans. If preferred, the DEQ may obtain electronic copies of these plans by sending a request via email to Vivian Rowles at [vrowles@us.brembo.com](mailto:vrowles@us.brembo.com).

In response to the continuous monitoring and recording of the acid scrubber parameters, Brembo has completed the project involving the replacement and updating of all monitoring and recording equipment for the acid scrubber. This included new hardware and software to monitor, measure and record the pH of the scrubber solution, flow rate of scrubber solution and pressure differential across control bed. All data is now displayed clearly on the scrubber HMI, continuously monitored with appropriate alarms and records set to be maintained for a period of 5 years.

**BREMBO NORTH AMERICA INC.**

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Brembo is in the process of finalizing updates to the malfunction abatement plan (MAP) for the acid scrubber to account for any modifications relating to the new recording and monitoring equipment. Once finalized Brembo will send official notification along with hard copy to the DEQ.

In regards to the automatic calculation and display of our combined 3-hour CEMS average, Brembo is in the final stages of finishing this project. We've experienced some unforeseen programming hurdles due to the different programming languages/software in-use and are currently working with our programmers and an outside vendor to quickly solve these hurdles.

Last remaining hurdle is a slight delay of time being experienced between the calculation and actual display of the combined 3-hour CEMS average in our SCADA system. Currently the company is able to produce real time readings at SCADA for both individual CEMS and complete the necessary calculations to obtain and display the 3-hour combined average. The company can also display the calculated combined 3-hour average of both CEMS but are experiencing a slight delay between the calculation and actual display of the combined 3-hour average. We fully expect to have a resolution to this last remaining hurdle soon and will provide additional information once complete.

If you have any questions related to the information provided herein please contact me directly at (734) 468-2092 or [jconard@us.brembo.com](mailto:jconard@us.brembo.com).

Sincerely,  
**Brembo North America, Inc.**

Jessy L. Conard  
*Safety, Health and Env. Manager*

**BREMBO NORTH AMERICA INC.**

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