

September 19, 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 Notices Response**



Dear Mr. Lane:

Brembo North America, Inc. (Brembo or the company) is submitting this letter in response to the MDEQ's Violation Notices dated August 29, 2018 and September 5, 2018. At this time, the company is providing below the written response elements specified in the notices.

1. Dates the alleged violation occurred.

The emission limit violations are alleged to have occurred based on the results of the emissions testing conducted at the foundry on April 23-26, 2018.

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

The purpose of this emission testing was to develop representable emission factors for the foundry. These factors will be used for modification of our air permit to better align with our actual emissions.

At this time, the test reports which document the results of the foregoing emissions testing campaign and associated foundry operating data are still under review. Through the review process Brembo hopes to gain insight into the likely causes and duration of the alleged emission limit violations and permit revisions that may be needed to address them.

3. Whether the alleged violation is ongoing.

The test reports are still under review; therefore, Brembo is not in a position at this time to assess whether or not the alleged emission limit violations are ongoing.

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 be undertaking the following actions related to the matters expressed in the VNs.

**BREMBO NORTH AMERICA, INC.**

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Action No.	Description	Tentative Timeframe
1	Complete detailed technical review of test reports from the April 23-26 campaign and associated foundry operating data.	September
2	Consult with air pollution control equipment vendors regarding apparent data discrepancies in the test reports.	September
3	Develop site-specific emission factors for certain emission units based on test reports and foundry operating data.	September
4	Develop revised emission estimates for the entire foundry and prepare associated PTI amendment strategy, including preliminary air dispersion modeling.	October
5	Convene a pre-application meeting with MDEQ to review revised emission estimates and PTI amendment strategy.	October
6	Prepare/submit PTI amendment application.	Oct/Nov

The foregoing timeframes are based on the information currently available to Brembo and are subject to change.

5. Steps being taken to prevent a reoccurrence.

Once issued, it is anticipated that the amended PTI referenced above will prevent recurrence of the alleged emission limit violations.

In addition to the foregoing, the company wishes to express our concern about the validity and representativeness of certain results from the April 23-26 campaign.

Brembo looks forward to working closely with MDEQ to address the matters expressed in the VNs. If you have any questions, comments or concerns 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  
*Senior Manager, EHS*

cc: Dan Sandberg (via e-mail)  
Mark Jacobs – Dykema (via e-mail)  
Chris Blume – RPS (via e-mail)  
Ms. Jenine Camilleri (via fedex)