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March 1, 2022

Ms. Amanda Chapel
Senior Environmental Quality Analyst
Michigan Department of Environmental, Great Lakes, and Energy
Air Quality Division
Kalamazoo District
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AQD - KALAMAZOO

**RE: Brembo North America, Inc. – Homer Foundry
AQD Source ID (SRN): N6226
Violation Notice Response**

Dear Ms. Chapel:

Brembo North America, Inc. (Brembo or the company) is submitting this letter in response to EGLE’s Violation Notice dated January 18, 2022 (the VN).

Our review and investigation of recent stack testing results is ongoing. In anticipation of a future meeting to discuss in greater detail the resolution to the matters conveyed in the VN, Brembo wishes to offer at this time the following written response with respect to each emission unit or flexible group in question. We have also included a corresponding schedule of actions which have been engaged to date and planned for the next several months.

EUFINISHING

EUFINISHING is subject to emission limits that date back to the initial PTI application for the foundry, which was submitted in March 2015. No applicable emission factors for PM2.5 were available at that time. EPA WebFIRE emission factors for PM and PM10 (i.e., SCC 30400340 and SCC 30400360) were relied upon, in conjunction with engineering judgement, as the basis for estimating emissions from the associated activities in the permit application. Emissions from EUFINISHING were not previously evaluated through stack testing; and, when sampled on 10/26/2021, the emission factors relied upon were found to be inaccurate to a certain degree.

Brembo’s review and analysis of sampling results and corresponding operating data is still in progress. Ultimately, we will utilize the most representative information available to update the previously established site-specific emission factors, and work with AQD to reallocate emissions amongst various sources within the foundry through a PTI amendment.

FGMELTING

A review of the October 2021 testing results has led Brembo to believe that the efficiency of our dust collector bags was less than expected. Over the years, bags have been replaced using ones in stock since the foundry was first constructed; which were stored in original packaging in our dust collector room. Brembo recently learned from the vendor that, under such conditions of storage (e.g., folded and stored as originally received, in cardboard boxes) the recommended shelf life for the bags about 1 year. We were

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previously unaware that weak spots can form in the folded area of a bag, thereby compromising its integrity and particulate removal efficiency.

Through our efforts to understand the lower-than-anticipated performance of the baghouse (dust collector) in question, Brembo has also learned that multiple filters have become saturated and were potentially allowing small amounts of particulate matter to bleed through.

Replacement bags now being kept in stock have been designated with a 1-year shelf-life in our warehouse management system. Any bag remaining in stock for greater than 12 months will be flagged, removed from inventory, and returned to the vendor or properly disposed.

Manpower shortages, especially in the maintenance and skilled trades area, coupled with accelerated employee turnover during the COVID-19 Pandemic, have caused challenges to baghouse performance. As a result, replacement of all 1,768 filters was postponed and substituted with visual inspection and analysis techniques to identify compromised bags.

Given the foregoing, Brembo has ordered and expedited new bags delivery for all baghouses, regardless of testing results. This comprehensive bag replacement project is expected to be completed over the next two months.

We are conducting an in-depth review of the maintenance plans for all baghouses. This includes a detailed review of all system components to optimize the effectiveness of maintenance tasks as it relates to particulate matter collection and removal for the respective exhaust gas streams. Additional and prioritized tracking and oversight of baghouse maintenance schedules is also being implemented. We expect these efforts will be completed in one to two months.

Schedule of Actions

Below we have summarized a sequential series of completed and ongoing actions that Brembo is undertaking with respect to the matters conveyed in the VN.

Action No.	Description	Target Completion Tentative
1	Establish additional and prioritized tracking and oversight of baghouse maintenance schedules.	Completed
2	Order, for expedited delivery, replacement filter bags for all dust collectors (baghouses).	Completed
3	Renew stock of replacement filter bags, and establish 1-yr shelf-life inventory management requirement.	Completed
4	Complete comprehensive filter bag replacement project for all dust collectors (baghouses).	March 28
5	Conduct in-depth review of baghouse maintenance plans.	April 4
6	Conduct a detailed technical review of stack testing results and process, control device, and monitoring data.	April 18
7	Update site-specific emission factors.	April 25
8	Reallocate aggregate emission limit amongst various sources and evaluate associated ambient air quality impacts through preliminary emissions dispersion modeling.	May 9

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9	Present the emissions reallocation to EGLE AQD staff in a PTI pre-application meeting.	May 11
10	Prepare and submit a PTI amendment application.	June 6


In addition, Brembo anticipates being prepared to discuss in greater detail the resolution of matters conveyed in the VN in the late March time frame.

Closing

Brembo looks forward to working closely with EGLE AQD to resolve the matters conveyed the VN. If you have any questions, comments or concerns related to the information provided above please contact me directly at (734) 468-2092 or jconard@us.brembo.com.

Sincerely,

Brembo North America, Inc.



Jessy Conard
Director, EHS

cc: Mr. Dan Sandberg (via e-mail)
Mr. Mike Conway (via e-mail)
Mr. Mark Jacobs – Dykema (via e-mail)
Mr. Chris Blume – RPS (via e-mail)
Ms. Jenine Camilleri- EGLE (via e-mail and USPS)

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