



STATE OF MICHIGAN
 DEPARTMENT OF
 ENVIRONMENT, GREAT LAKES, AND ENERGY
 KALAMAZOO DISTRICT OFFICE



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

October 1, 2019

Mr. Dan Sandberg
 President and CEO
 Brembo North America, Inc.
 47765 Halyard Drive
 Plymouth, Michigan 48170

SRN: N6226, Calhoun County

Dear Mr. Sandberg:

VIOLATION NOTICE

On September 9, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Brembo North America, Inc. located at 29991 M-60 East, Homer, Michigan. The purpose of this inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 145-12B, 199-14A; the conditions of Renewable Operating Permit (ROP) number MI-ROP-N6226-2015; and Consent Order AQD number 2019-19.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-Magni-06	Rule 336.1201 No Permit to Install (PTI)	The facility applied for and received a permit to install 145-12B which included a new EU-Zinc-06 line. In January 2019, the facility installed a new EU-Magni-06 line. The EU-Magni-06 line was not evaluated under the PTI new source review. The new, permitted EU-Zinc-06 line was never installed. The EU-Magni-06 line is considered to be operating without a permit.
Rust Inhibitor	Rule 336.1201 No Permit to Install	The facility uses a rust inhibitor, Eco Cool 7045, which replaced Super Cool 310 YBW. During the last inspection, it was discussed that the rust inhibitor likely met the 290 exemption and records were needed to

		show compliance. Records are still required for the new rust inhibitor to show compliance with this exemption. During the inspection, no records were available to show that usage of Eco Cool 7045 Rust Inhibitor met the Rule 290 exemption.
FG-BMG	PTI 145-12B Special Condition (SC) II.1	According to records, the facility uses both Magni and Zinc paint on the lines in the BMG flexible group. All paint used on a line is subject to the lines' material limit. This flexible group has a material limit of 3.5 lbs VOC/gallon (minus water) as applied. Method 24 testing and the SDS provided for the Zinc paint show a VOC content of 3.95 lbs VOC/gallon and 3.8 +/- 0.3 lbs VOC/gallon respectively. This exceeds the limit of 3.5 lbs VOC/gallon on the FG-BMG line.
FG-ZINC	PTI 145-12B SC II.1	During the inspection, records were not available to show compliance with the 11.0 lbs of VOC per gallon of applied coating solids on a calendar day basis. Records were later sent showing that on 9/5/19 the facility met the limit with the Zinc paint. However, the limit applies to all paint used on the line for both Magni and Zinc paints. The facility has not been able to provide daily records showing compliance with this limit for all coatings used on the line.

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During this inspection, Brembo Disc Plant was unable to produce complete emission records to demonstrate daily compliance with the material limit special condition under FG-Zinc.

This is a violation of the recordkeeping and material limitations specified in Special Condition 5.g of PTI number 145-12B.

The conditions of PTI number 145-12B require the facility to maintain daily usage, VOC, solids content, transfer efficiency, and emission calculation records for each emission unit of EU-Zinc. They are required to have the calculated daily VOC emission rate in pounds per gallon of applied coating solids, completed on a monthly basis, and made available to the department upon request.

The facility also has material limit requirements on FG-BMG line under SC II.1 for pounds of VOC/gallon (minus water) as applied. Any paint used on this line is subject to this material limit. Because the facility is running non-compliant zinc paint on these lines, it is a violation of this condition.

During this inspection, it was noted that the facility had installed and commenced operation of an unpermitted coating line, EU-Magni-06, at this facility. The facility was permitted to install equipment associated with an EU-Zinc-06 line through the PTI 145-12B, not equipment for a new Magni line. Because a different line was installed than the one the facility applied for a permit to install, the new EU-Magni-06 line is considered to be operating without a permit.

A program for compliance may include a completed PTI application for the EU-Magni-06 process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Also, during this inspection, it was noted that there were no rule 290 exemption records available for review to show the facility's usage of Eco Cool 7045 Rust Inhibitor is meeting this exemption. During the inspection in 2017, the facility was informed they need to keep 290 records for the rust inhibitor used on site or have the chemical added as a process in the permit. According to the SDS, Eco Cool 7045 contains triethanolamine which has an ITSL of 50 according to the AQD database. This exemption requires each chemical component of the tracked substance to be listed, with the associated ITSL or IRSL, whether it is controlled or uncontrolled, and the monthly emissions.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 22, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Brembo North America, Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
(269) 910-2109

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE
Mr. Mark Kentworthy, Brembo North America, Inc.
Mr. Jessy Conard, Brembo North America, Inc.