

Via Electronic and U.S. Mail

November 22, 2021

Iranna Konanahallii  
Michigan Department of Environment, Great Lakes, and Energy  
Air Quality Division, Warren District  
27700 Donald Court  
Warren, MI 48092  
Konanahallii@michigan.gov

**RE: FCA US LLC (FCA) – Warren Truck Assembly Plant, SRN: B2767  
Response to Violation Notice**

Dear Mr. Konanahallii:

This letter responds to AQD's November 1, 2021 Violation Notice ("VN"), which alleges a violation of EU-PRIMERWEST, Special Condition IV.1 of Permit to Install ("PTI") No. 13-19B for failing to duct emissions from the ambient flash-off zone to the concentrator and regenerative thermal oxidizer ("RTO").

**Description of EU-PRIMERWEST**

The ambient flash zone in EU-PRIMERWEST is a short section of the painting process located after the prime spray booth (and Tutone spray booth) before the vehicle body enters the oven. Upon becoming aware of a ducting concern at our Detroit Assembly Complex Mack, we assessed the similar new paint shop at our Warren Truck Assembly Plant and discovered that the EUPRIMERWEST ambient flash zone is not ducted to the RTO, but is instead routed to an exhaust stack. Upon discovery, we promptly notified EGLE of the issue.

**Proposed Corrective Action**

FCA has assessed its existing installation and developed a plan for ducting the EUPRIMERWEST ambient flash zones' emission to the RTO. The plan includes the installation of ducting and equipment, which will be connected to the existing RTO upstream of the concentrator. The current ducting from the EUPRIMERWEST ambient flash zones will be disconnected from the existing exhaust stack and connected to this new ducting. Following installation, the ducting will direct VOC emissions to the concentrator and then to the RTO. This is the configuration described in FCA's permit. In addition, the project will require electrical work and new controllers and associated equipment.

Although the plant is operating within its permitted emission limits, correcting this condition is our top priority. We have already begun engineering and procurement of critical long lead equipment necessary to operate the system. We anticipate being able to complete the installation by the end of February 2022.

Following the connection of the EUPRIMER ambient flash zones to the emission control system we will conduct new capture efficiency testing on the concentrator and destruction efficiency testing on the RTO, as those parameters can vary with additional exhaust flow.

FCA will also provide a revision to the ROP application that reflects PTI #13-19B and includes a Schedule of Compliance. The CAM Plan will be reviewed and updated, as needed. This application update will be submitted by December 31, 2021.

We appreciate our responsibility to comply to the fullest extent with the terms of our air permit. This plan will address the ducting requirement, and we look forward to completion of this project as soon as possible.

Please feel free to contact Bradley Wargnier at [bradley.wargnier@stallantis.com](mailto:bradley.wargnier@stallantis.com) if you should have any questions.

Sincerely,



Andrew Ragalyi  
Plant Manager  
FCA US LLC, Warren Truck Assembly Plant

C: Ms. Joyce Zhu, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, AQD ([camillerij@michigan.gov](mailto:camillerij@michigan.gov))  
Mr. Brad Wargnier, WTAP  
Ms. Melissa Sawa, WTAP  
Mr. Garrett Stricker, EHS Assembly Division Lead  
Mr. Al Johnston, FCA Corporate EHS  
Mr. Matt Read, FCA OGC