

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

B275757894

<b>FACILITY:</b> FCA US LLC WARREN STAMPING PLANT		<b>SRN / ID:</b> B2757
<b>LOCATION:</b> 22800 MOUND RD., WARREN		<b>DISTRICT:</b> Warren
<b>CITY:</b> WARREN		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Audrey Joslin , Environmental Specialist		<b>ACTIVITY DATE:</b> 04/29/2021
<b>STAFF:</b> Rem Pinga	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> Scheduled On-site Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On April 29, 2021, I conducted a level 2 inspection at FCA US LLC Warren Stamping Plant. The facility is located at 22800 Mound Road, Warren, Michigan 48091. The purpose of the 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 administrative rules, the facility's Renewable Operating Permit (ROP) No. MI-ROP-B2757-2019. During the inspection, I was accompanied by Ms. Audrey Joslin, new facility contact person. Prior to conducting the walk-through inspection, I initially showed my credentials and stated the purpose of the inspection.

To comply with the COVID-19 Emergency AQD Field Inspection Guidance Update (June 2020), the inspection was announced and scheduled. I set up the inspection via telephone call to Ms. Joslin. Ms. Joslin emailed me an electronic copy of the facility's Visitor Health Screening Form that I am supposed to fill out and submit online the same day prior to entering the facility. At the site, I was met by Ms. Joslin at the front entrance and the protocol temperature check was conducted via a remote temperature scanner. I entered the facility wearing a face mask, face shield, safety glasses, hard hat, and safety shoes. Ms. Joslin was wearing face mask and we practiced social distancing the entire time I was at the facility and while conducting walk-through inspection.

The facility is considered a major source under the Clean Air Act of 1990, and operates under a Title V permit, ROP No. MI-ROP-B2757-2019 because it is adjacent to FCA US LLC Warren Truck Assembly Plant, and both are under common ownership and control of Stellantis N.V., an automobile manufacturing company formed in 2021 with the 50-50 merger of Fiat Chrysler Automobiles (FCA) and the French PSA Group and headquartered in Amsterdam, Netherlands. A major stationary source is defined as all of the pollutant emitting activities that are (1) located on one or more contiguous or adjacent properties; (2) are under common control of the same person (or persons under common control); and (3) belong to a single major industrial grouping or are supporting the major industrial

group (as determined by the Major Group codes in the Standard Industrial Classification Manual).

FCA US LLC Warren Stamping Plant manufactures automotive parts such as front and rear door panels, hoods, lift gates, fenders, inner panels, etc., for FCA automotive assembly plants. Currently, Ms. Joslin mentioned that the facility supplies parts for the Jeep Cherokee and the Wagoner in the FCA US LLC Warren Truck Assembly Plant. During the walk-through inspection, I observed several presses and sub-assembly areas. Ms. Joslin mentioned that inside the stamping plant, all materials flow from North to South.

The ROP, recently revised with effective date of February 26, 2019, contained 2 emission units - EUCARP-SHOP, EUHIGHLIGHT; and 2 flexible groups - FG-RULE 290, FG-RULE 287(2)(c).

**EUCARP-SHOP** – this emission unit pertains to the carpentry shop activities that included sawing, sanding, and other woodworking equipment. The particulate emissions from the equipment in the shop are controlled by dry filter/collector system. During the walk-through inspection, I observed that the equipment in the shop stations, such as the saw, planer, grinder, sander, etc., are equipped with individual capture hoods ducted to a common bag filter system. The bag filters are connected to a hopper system discharging into a particulate matter collection drum. Per ROP No. MI-ROP-B2757-2019(C)(EUCARP-SHOP(VI.1)), the facility conducts quarterly inspections on the integrity of the filters and keeps records of the inspection results/activities. I did not observe any visible emissions inside the shop.

**EUHIGHLIGHT** – refers to the application of highlighter fluid for quality control purposes. During the walk-through inspection, I observed some stations where the fluid is wiped on the sample parts to inspect for defects. Per ROP No. MI-ROP-B2757-2019(C)(EUHIGHLIGHT(VI.2)), the facility kept monthly usage rates records of highlight fluid. Per ROP No. MI-ROP-B2757-2019(C)(EUHIGHLIGHT(VI.3)), the facility kept monthly and monthly 12-month rolling total records of VOC emission rates. Per ROP No. MI-ROP-B2757-2019(C)(EUHIGHLIGHT(I)), the submitted records showed the highest monthly 12-month rolling total VOC emission rate from January 2020 through March 2021, was reported at 1.14 tpy for January 2020 and less than the 5.62 tpy permit limit. The spreadsheet showed declining emission rates through October 2020, reported at 0.69 tpy, due to Covid-19 related production cuts/stoppage. The VOC emission rates started to climb back from November 2020.

**FG-RULE 290** – refers to any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a, and Rule 290. In this facility, the emission unit, EU-ADHES-STATIONS, belongs to this flexible group. Ms. Joslin took me to the sub-

assembly area where the adhesives under EU-ADHES-STATIONS are pumped from 55-gallon drums into applicators for use either as sealers or structural adhesives. As structural adhesive, the sealer is usually pumped into the space between the outer and inner panels. The facility keeps records of adhesive usages and calculates VOC emission rates of components to comply with AQD Administrative Rule R 336.1290. In FY 2020, the facility submitted records showing the total VOC emissions at 700.44 lbs. or 0.35 tpy. Henkel adhesive contributed the most VOC emissions at 581.12 lbs. From January through March 2021, the facility reported 271.22 lbs. total VOC emissions with Henkel adhesive contributing 228 lbs. from the total emissions.

FG-RULE 287(2)(c) – refers to any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278, 278a, and 287(2)(c). EUMAINPT-DCK is the emission unit under this flexible group and reported as installed prior to December 20, 2016. Ms. Joslin took me to this maintenance spraybooth during walk-through inspection. Per ROP No. MI-ROP-B2757-2019(D)(FG-RULE 287(2)(c)(IV.1)), I observed dry filters to control particulate emissions from the maintenance spray booth. The filters appeared to be operating properly as I did not observe gaps in between filters. Per ROP No. MI-ROP-B2757-2019(D)(FG-RULE 287(2)(c)(VI.1)), the facility submitted recordkeeping that showed less than 200 gallons of coating usage per month and in compliance with this applicable requirement. In FY 2020, the facility reported 0.0 gallons usage from April through October 2020 due to Covid-19 facility shutdown. The rest of the months, the facility reported coating usage between 20 to 25 gallons per month.

Overall, I did not find any non-compliance issues during inspection.

NAME



DATE

07/19/2021

SUPERVISOR

