



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

November 1, 2021

VIA E-MAIL AND U.S. MAIL

Mr. Andrew Ragalyi, Plant Manager
Stellantis NV
FCA US LLC Warren Truck Assembly Plant
21500 Mound Road
Warren, Michigan 48091-4840

SRN: B2767, Macomb County

Dear Mr. Ragalyi :

VIOLATION NOTICE

On October 26, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Stellantis NV, FCA US LLC Warren Truck Assembly Plant (WTAP or Warren Truck or the company) located at 21500 Mound Road, Warren, Michigan. The purpose of this inspection was to determine Warren Truck'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 13-19B dated June 23, 2021, issued to FCA US LLC.

During the October 26, 2021, inspection of WTAP, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-PRIMERWEST ^θ	Major Offset Source, LAER PTI No. 13-19B, EU-PRIMERWEST, SC IV.1 ^β	WTAP failed to capture and deliver solvent-based guide-coat primer/ primer surfacer (a solvent-based robotic primer spray coating) ambient flash-off zones Volatile Organic Compound (VOC) emissions Concentrator & Regenerative Thermal Oxidizer (RTO) control system. Hence, the ambient flash-off VOC emissions are uncontrolled contrary to the special conditions of the permit.

^θ A prep tunnel, two (2) automatic primer booths, one for solvent borne main primer and one for solvent borne tutone coloring primer, a primer observation zone, an ambient flash-off area, a natural gas-fired primer curing oven, and a cooling tunnel, followed by two booths (color prep booth and heavy reprocess sand) for repair of surface blemishes.

^β The permittee shall not operate the coating booth, ambient flash, or curing oven portions of EU-PRIMERWEST unless the west concentrator and west RTO portions of FGCONTROLS are installed, maintained, and operated in a satisfactory manner.

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Be aware that state and federal air pollution regulations prohibit Stellantis NV, FCA US LLC from obtaining any new permits for major offset sources located in Michigan until the cited violation(s) are corrected or until Stellantis NV, FCA US LLC has entered a legally enforceable order or judgment specifying an acceptable program and schedule for compliance.

Within 60 calendar days, please submit a revised **Renewable Operating Permit (ROP) application** that reflects current applicable requirements including PTI No. 13-19B accompanied by a **Schedule of Compliance (SC)**. Please update the CAM plan as needed as well.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **November 22, 2021** (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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Stellantis NV, FCA US LLC 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 Warren Truck. 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,



Iranna Konanahallii
Senior Environmental Engineer
Air Quality Division
Konanahallii@Michigan.Gov

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cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Mr. Robert Byrnes, EGLE
Mr. Jeff Rathbun, EGLE
Mr. Sebastian Kallumkal, EGLE
Ms. Kerry Kelly, EGLE
Ms. Laura Hall, Stellantis
Mr. Bradley Wargnier, Stellantis
Ms. Sandra Walker, Stellantis