

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GRETHER DIRECTOR

December 1, 2016

Mr. Mark Cerny Director, Powertrain FCA US Technology Center 1000 Chrysler Drive CIMS: 486-01-55 Auburn Hills, MI 48326

SRN: N1436, Oakland County

Dear Mr. Cerny:

## VIOLATION NOTICE

On November 1, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a report of the stack test conducted for evaluating air emissions of FG-UNCNTRLDCELLS-S2 and FG-CNTRLDCELLS-S2 from FCA US Technology Center located at 800 Chrysler Drive, Auburn Hills, Michigan. The purpose of this stack test was to verify emission rates from FCA US Technology Center to determine 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 Renewable Operating Permit (ROP) number MI-ROP-N1436-2013.

Upon review of the test report, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-CNTRLDCELLS-S2: Fifty (50) engine dynamometer test cells located in Wing C, Wing D and Wing E (durability, transmission and catalyst test cells). Emissions from these test cells are controlled with one of eleven thermal oxidizers.	ROP No. MI-ROP-N1436- 2013 Special Condition I: Carbon monoxide (CO) Emission Limit of 0.01 pounds/gal.	Stack test results show FG-CNTRLDCELLS-S2 CO emissions exceeded the emission limit of 0.01 pounds CO/gallon fuel. CO emissions from Wing C Oxidizer 4.01 were 0.017 pounds CO/gallons of fuel. CO emissions from Wing D, Oxidizer 4.01 were 0.029 pounds CO/gallons of fuel.

The test report demonstrates that actual emissions of carbon monoxide from the FG-CNTRLDCELLS-S2 process equipment were 0.017 pounds/gallon from Wing C, Mr. Mark Cerny Page 2 December 1, 2016

Oxidizer 4.01, and 0.029 pounds/gallon from Wing D, Oxidizer 4.01. The conditions of MI-ROP-N1436-2013 limit the emissions of CO to 0.01 pounds/gal.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 22, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If FCA US Technology Center 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 violation cited above and for the cooperation that was extended to me during my observation of FCA US Technology Center stack tests. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Sam Liveson Environmental Engineer Air Quality Division 586-753-3749 or livesons1@michigan.gov

cc/via e-mail: Mr. Stuart Weiss, FCA Mr. David Jump, FCA Mr. Mark Werthman, FCA Mr. Rohit Patel, FCA Ms. Lynn Fiedler, DEQ Ms. Mary Ann Dolehanty, DEQ Mr. Chris Ethridge, DEQ Mr. Thomas Hess, DEQ Ms. Joyce Zhu, DEQ