



Via Electronic and U.S. Mail

November 5, 2021

Dr. April Wendling
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202
wendlinga@michigan.gov

**RE: FCA US LLC (FCA) – Detroit Assembly Complex Mack, SRN: N2155
Response to Violation Notice**

Dear Dr. Wendling:

This letter responds to AQD's October 20, 2021 Violation Notice ("VN"), which alleges a violation of EU-PRIMER, Special Condition IV.1 of Permit to Install No 14-19a for the "Failure to duct EUPRIMER ambient flash zones' emissions to regenerative thermal oxidizer control ["RTO"]."

Description of EU-PRIMER

The ambient flash zone in EU-PRIMER is a short area located after primer (and Tutone) before the vehicle body enters the oven. Following an inspection of our facility, we discovered that the EUPRIMER ambient flash zone was not ducted to the RTO, but is instead routed to an exhaust stack.

Proposed Corrective Action

FCA has assessed its existing installation and developed a plan for ducting the EUPRIMER 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 EUPRIMER 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 indicated by FCA's permit. In addition, the project will require electrical work and new controllers and 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 plan to begin the project later this month and complete the installation by the end of this year.

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.

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 Rebecca Payne at rebecca.payne@stellantis.com if you should have any questions.

Sincerely,



Michael Brieda
Plant Manager
FCA US LLC, Detroit Assembly Complex Mack

C: Mr. Bob Byrnes, AQD (byrnesr@michigan.gov)
Ms. Rebecca Payne, Mack Environmental Specialist
Mr. Garrett Stricker, EHS Assembly Division Lead
Mr. Al Johnston, FCA Corporate EHS
Mr. Matt Read, FCA OGC
Ms. Jenine Camilleri, AQD (camillerij@michigan.gov)