



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 20, 2021

Mr. Michael Brieda, Plant Manager
FCA US LLC – Detroit Assembly Complex Mack
4000 Saint Jean Street
Detroit, MI 48214

SRN: N2155, Wayne County

Dear Mr. Brieda:

VIOLATION NOTICE

On August 27, August 31, and September 3, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), investigated complaints of nuisance odors alleged to be the result of operations at FCA US LLC – Detroit Assembly Complex Mack, located at 4000 Saint Jean Street, Detroit, Michigan. The purpose of these investigations was to determine FCA US LLC – Detroit Assembly Complex Mack’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; Permit to Install (PTI) 14-19a; and to investigate complaints of nuisance odors received on August 27, August 31, and September 3, 2021.

Investigations were performed by Mr. Sam Liveson and Mr. Jonathan Lamb of the AQD on the following dates and times:

- August 27, 2021, from 3:25 PM to 5:32 PM
- August 31, 2021, from 5:55 PM to 7:10 PM
- September 3, 2021, from 10:40 AM to 11:52 AM

During each of these investigations, the following violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
FG-AUTOASSEMBLY	R 336.1901(b); PTI 14-19a, General Condition No. 6	Moderate to Strong (Level 3 and/or 4) paint/solvent odors observed emitting from the facility and impacting nearby neighborhoods.

During the investigation performed on August 27, 2021, AQD staff observed persistent and objectionable paint/solvent odors of moderate intensity (Level 3) impacting residential areas downwind of the facility. During the investigations performed on August 31 and September 3, 2021, AQD staff observed persistent and objectionable paint/solvent odors of moderate to strong intensity (Level 3 and 4) impacting residential areas downwind of the facility. In each of these investigations, AQD staff determined the source of the odors to be FCA US LLC – Detroit Assembly Complex Mack. In AQD

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staff's professional judgment, the odors observed during each investigation were objectionable and of sufficient intensity, duration, and frequency to constitute a violation of Rule 901(b), and General Condition No. 6 of PTI 14-19a: an "unreasonable interference with the comfortable enjoyment of life and property."

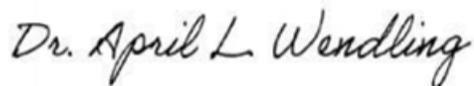
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 11, 2021. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are 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, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If FCA US LLC – Detroit Assembly Complex Mack 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. 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,



Robert Byrnes
Environmental Engineer Specialist
Air Quality Division
517-275-0439

cc: Ms. Rebecca Payne, Supervisor EHS, FCA US LLC
Mr. Paul Diven, EHS, FCA US LLC
Mr. Hosam N. Hassanien, City of Detroit BSEED
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE
Mr. Jonathan Lamb, EGLE
Mr. Sam Liveson, EGLE