



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 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 October 12, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of FCA Detroit Assembly Complex MACK located at 4000 Saint Jean Street, Detroit, Michigan. The purpose of this inspection was 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 Permit to Install (PTI) number 14-19a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPRIMER	PTI 14-19a EU-PRIMER, Special Condition IV.1	Failure to duct EUPRIMER ambient flash zones' emissions to regenerative thermal oxidizer control

During the capture and transfer efficiency testing on October 12, 2021 and subsequent discussion on October 13, 2021 EGLE-AQD staff observed Volatile Organic Compound emissions from the EUPRIMER ambient zones were not being ducted to the concentrator and Regenerative Thermal Oxidizer (RTO) as required by PTI 14-19a, EU-PRIMER Special Condition IV.1. The emission calculations in the file for PTI14-19a and the basis of special condition IV.1 show the flash zones are required to be ducted to the concentrator and RTO.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 10, 2021 (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

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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.

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 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 inspection of October 12, 2021. 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,

*Robert Byrnes*

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

cc: Ms. Rebecca Payne, 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  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Dr. April Wendling, EGLE  
Mr. Jeff Korniski, EGLE  
Mr. Jonathan Lamb, EGLE  
Mr. Sam Liveson, EGLE