

June 3, 2022

Mr. Iranna Konanahalli
Michigan EGLE-Air Quality Division
Warren District Office
27700 Donald Court
Warren, MI 48092
Konanahallii@michigan.gov

**RE: FCA US LLC (FCA) – Warren Truck Assembly Plant (WTAP)
Response to Violation Notice – May 13, 2022**

Dear Mr. Konanahalli:

This letter responds to AQD's May 13, 2022 Violation Notice ("VN") alleging a violation of the PM_{2.5} emission limit at Special Condition I.6 for FG-RTOWEST in Permit-to-Install No. 13-19B. The alleged violation is based on the April 19, 2022 stack test report for emissions sampling that took place at WTAP in February 2022.

Although the April 19, 2022 test report identified some irregularities during testing, the RTO-West Concentrator sampling yielded a PM_{2.5} emission rate of 0.36 pounds per hour ("pph"), which exceeds the corresponding 0.123 pph emission limit.

FCA continues to investigate whether: (1) the underlying operations during stack testing were representative; (2) the February 2022 testing was accurate; and (3) the Method 5/202 sampling train was appropriate for sampling PM_{2.5} given the inability of Method 5 to speciate between PM versus PM_{2.5}. Nevertheless, FCA suspects that the combination of filterable and condensable PM emissions from the RTO-West Concentrator may be higher than what was assumed during the air permitting for these operations. Specifically, FCA used theoretical estimates based on EPA's AP-42 published total PM emission factors for filterable and condensable PM from natural gas combustion during permitting because the company lacked actual PM_{2.5} test result data at that time.

As a result of FCA's review of particulate emissions at WTAP, FCA has scheduled a series of retests that began in May 2022. Based on the test results, FCA expects to confirm the particulate emissions from several WTAP emission units, including the RTO-West Concentrator that is the subject of the VN.

Based on these upcoming test results, FCA expects to either: (A) document compliance with all the applicable particulate emission limits; or (B) apply for a revision to PTI# 13-19B to address problematic particulate emission limits. In anticipation of the latter scenario, FCA has already begun its preparation of an application to revise PTI #13-19B, although the need for and scope of the PTI modification remains unknown pending the outcome of testing. Once FCA completes the

testing, it will report the results to AQD and propose the next steps, including the potential need to modify particulate emission limits in PTI #13-19B.

I believe that this letter responds to the requests in the VN, but please contact Brad Wargnier at 1-248-791-6349 or via email at bradley.wargnier@stellantis.com if you have any questions.

Sincerely,



Chuck Padden
Plant Manager
FCA US LLC, Warren Truck Assembly Plant

C: Ms. Joyce Zhu, AQD-District
Mr. Bob Byrnes, AQD-District
Ms. Jenine Camilleri, AQD-Enforcement
Ms. Erin Moran, AQD-Enforcement
Mr. Brad Wargnier, WTAP-EHS
Ms. Laura Hall, WTAP-EHS
Mr. Garrett Stricker, EHS Assembly Division Lead
Ms. Sandra Walker, FCA Corporate EHS
Mr. Al Johnston, FCA Corporate EHS
Mr. Greg Rose, FCA Corporate EHS
Mr. Matt Read, FCA OGC
Mr. Kurt Kissling, Warner Norcross + Judd LLP