

Via Electronic and U.S. Mail

November 4, 2022

Via Email and U.S. Mail

Mr. Iranna Konanahallii
EGLE-AQD Warren District
27700 Donald Court
Warren, MI 48092
konanahallii@michigan.gov

**RE: FCA US LLC (FCA) — Warren Truck Assembly Plant (SRN B2767)
Response to October 21, 2022 Violation Notice**

Dear Mr. Konanahallii:

Based on Ms. Zhu's October 25 e-mail, this letter timely responds to the October 21, 2022 Violation Notice ("VN") sent by the Air Quality Division ("AQD") alleging excess particulate emissions from FGRTOEAST at the Warren Truck Assembly Plant ("WTAP"). Specifically, AQD cited the results from a July 15, 2022 stack test report to allege violations of the 0.518 pound-per-hour ("pph") emission limit for both PM₁₀ and PM_{2.5} in PTI #13-19B, at FGRTOEAST S.C. I.2 and I.3.

After reviewing the test report, FCA investigated the status of the east regenerative thermal oxidizer (the "east RTO") at WTAP. While the east RTO was down during a cessation of operations, FCA and its vendors conducted a thorough internal review of the equipment and identified the malfunction of key equipment. Specifically, FCA and its vendors replaced the center rotor bearing and adjusted rotor seals inside of the east RTO that were not functioning properly and likely impacted the emissions during testing.

After completing these repairs to the east RTO, FCA conducted an engineering study on September 23, 2022, to confirm the success of the repair. Although the lab analysis of the filterable and condensable particulate sample results took several weeks to process, this confirmatory testing—patterned after EPA Test Method 5/202—measured an east RTO emission rate of 0.209 pph for PM₁₀ and PM_{2.5}. This result was well below the prior test result as well as the 0.518 pph emission limit at FGRTOEAST S.C. I.2 and I.3, and therefore confirmed the success of the equipment repair.

As a result, on October 14 (i.e., a week *before* the VN), FCA sent the attached intent-to-test notification to AQD seeking an official retest of the east RTO on November 21, 2022. FCA expects to confirm the already improved performance of the east RTO during this retest. In addition, FCA is reviewing its current east RTO inspection and maintenance requirements to ensure that the periodic reviews include a proper assessment of the bearing components and seal adjustments that malfunctioned in the east RTO.

Finally, please note that WTAP is owned and operated by FCA US LLC. Similarly, PTI #13-19B and its predecessors were each issued to FCA US LLC. By contrast, Stellantis N.V. is not an owner, operator, or permittee for WTAP. As a result, please direct all WTAP-related communications to FCA US LLC.

Although FCA representatives have already discussed some of these issues with AQD's Enforcement Section and Field Office, please contact Matt Read, in FCA's Office of General Counsel, at 248-385-8093, if you have any questions.

Sincerely,



Chuck Padden
WTAP Plant Manager
FCA US LLC

Enclosure: Intent-to-Test Notification

C: Mr. Chris Ethridge, AQD
Ms. Joyce Zhu, AQD
Ms. Jenine Camilleri, AQD
Ms. Erin Moran, AQD
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. Matt Read, FCA OGC
Mr. Kurt Kissling, Warner Norcross + Judd LLP