



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 20, 2022

Chuck Padden, Plant Manager
Stellantis N.V.
FCA US LLC Warren Truck Assembly Plant
21500 Mound Road
Warren, Michigan 48091-4840

SRN: B2767, Macomb County

Dear Chuck Padden:

VIOLATION NOTICE

On September 19, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a review of EU-SPOTREPAIREAST (Spot repair process in the east paint shop [WTAP EP]) P10/PM2.5 Stack Test Report (RWDI # 2201515 dated August 14, 2022) of Stellantis N.V., FCA US LLC Warren Truck Assembly Plant (WTAP or Waren Truck) located at 21500 Mound Road, Warren, Michigan 48091-4840. The purpose of this report review was to determine Warren Truck'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 13-19B dated June 23, 2021, issued to FCA US LLC.

During the September 19, 2022, stack test report review of FCA WTAP, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-SPOTREPAIREAST	PTI No. 13-19B, EU-SPOTREPAIREAST, SC 1.4-5 ^β	FCA WTAP failed to meet the PM2.5 and PM10 emission limits (0.026 pph for both) based upon RWDI #2201515 August 14, 2022, test report sampled about June (0.067 pph PM2.5 and 0.135 pph PM10) and August (0.028 pph PM2.5 and 0.037 pph PM10), 2022. ^{π, μ}
<p>^β PM2.5 and PM10 emission limits are 0.026 (for both) pounds of PM 2.5 and PM10 per hour from Spot repair process of the east paint shop of EU-SPOTREPAIREAST.</p> <p>^π FCA US LLC, Warren Truck Assembly Plant East Paint Shop (EP): Observation Zone (BC and CC) and Spot Prime Particulate Matter Compliance Test Report. RWDI #2201515 dated August 14, 2022. Sampled about June and August 2022, by RWDI USA LLC, 2239 Star Court, Rochester Hills, Michigan 48309. Sampling of the East Paint Shop (EP) Spot Repair.</p> <p>^μ Particulate matter (PM/PM10/PM2.5) was sampled following procedures outlined in U.S. EPA Reference Methods 1-4 and Method 201A. Each test run was for 240 minutes to ensure sufficient mass of PM was collected.</p>		

Calculating the PTE for PM2.5 based on the higher value between the stack test results and the permit limits (i.e., when a stack test result was higher than the permit limit, the stack test result is used; when the stack test result was lower than the permit limit, the permit limit is used) or calculating the PTE based on stack test results only using the latest stack test results provided, AQD finds that the project would have been subject to PSD review for PM2.5.

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Be aware that state and federal air pollution regulations prohibit Stellantis N.V., FCA US LLC from obtaining any new permits for major offset sources located in Michigan until all cited violation(s) are corrected or until Stellantis N.V., FCA US LLC has entered a legally enforceable order or judgment specifying an acceptable program and schedule for compliance.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **October 11, 2022** (which coincides with 21 calendar days from the date of this letter). 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, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Stellantis N.V., 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 violations cited above and for the cooperation that was extended to me during my inspection of Warren Truck. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Iranna Konanahallii
Senior Environmental Engineer
Air Quality Division
586-596-7630; Konanahallii@michigan.gov

cc: Laura Hall, Stellantis
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