DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: On-site Inspection

N215560626

FACILITY: FCA US LLC - JEFFERSON NORTH ASSEMBLY PLANT		SRN / ID: N2155
LOCATION: 2101 CONNER AVE, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Rebecca Payne , Supervisor Env, Health, Safety-MACK Assembly		ACTIVITY DATE: 10/27/2021
STAFF: Robert Byrnes	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Follow up site visit to observe body, paint, general assembly and to discuss progress on the odor and ambient zone VN's.		
RESOLVED COMPLAINTS:		

Wednesday October 27, 2021 meeting with Stellantis at MACK Assembly. Present at the meeting:

Greg Rose – EHS Director, Al Johnston – EHS Air Manager, Garrett Stickler – EHS Manager, Adam Azaraki – MACK EHS Manager, Rebecca Payne – MACK lead environmental representative, Paul Diven – MACK environmental representative, Dr. April Wendling – EGLE Detroit supervisor.

The purpose of this visit was to tour the Paint shop, Body shop and Final Assembly building as well as to discuss the recent VN's for odors and Primer Ambient Flash control.

I arrived at 9:00 am and approaching the lobby between body and paint I noticed a noisy vent which was blowing the trees and bushes from the North wall of the paint shop. As I approached the landscaping to determine if flow was in or out of the building it became obvious the direction was out of the building. The air had a slight smell of paint which could be a source of odors in the Beniteau neighborhood with the wind tunnel effect between the 2 buildings.

Inside we had a pre meeting where we discussed our recent findings. Stellantis did a quick presentation with a facility overview and their approach to odors. During the tour we visited the majority of the paint shop, and portions of body and final assembly. During the paint shop portion we were also introduced to the paint shop Manager Curtis Collins. Items of interest during the tour was a skid washer on the West side of the paint building that exhausted to atmosphere. The unit only uses high pressure water and does not use VOC additives for cleaning purposes. As we were exiting the paint shop on the North side of the building a paint solvent odor was again detected. I stopped the group and asked about the building enclosure in this area. The enclosure was EU-Spot Repair which was in use that day but the doors on the booth were all closed and not a likely source of odors. Outside the enclosure were 3 mask/gun cleaning units that exhaust internally and could be a likely source of odors exiting the general ventilation out the north side of the paint shop building (mentioned above during entry). Previous suspicion was around the Palen system area but improvements there (newer tarps and system cleaning) seemed to have significantly improved the odor in that area. The Rapid Repair area with mask/gun cleaning stations that vent internally (then through north paint shop wall side ventilation) is now a likely contributor to odors. Greg Rose asked Rebecca that if this area was included in the odor studie and that if not it should be included and to let RWDI know.

We concluded with a closure meeting where we discussed the response deadline to the Primer ambient flash zones VN. Both Al and Greg stated they were confident a possible solution to the issue would be known by the November 10, 2021 deadline. They also stated they were not considering a permit fix but were looking at alternatives for additional control of the ambient zones. This was caveated that it may take time depending on the solution, equipment availability, contractor availability and with a slight consideration of production scheduling. April and I left the facility at 12:15 pm.

NAME Robert Byrnes

DATE 10-28-2021 SUPERVISOR APRIL WENDLING 10/28/2021

https://intranet.egle.state.mi.us/maces/WebPages/ViewActivityReport.aspx?ActivityID=24804543