

B2164
MAW/LKDEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B216446018

FACILITY: CHRYSLER VIPER AUTO ASSEMBLY PLANT		SRN / ID: B2164
LOCATION: 20000 CONNER, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Norman Cary , Facility Maintenance Manager		ACTIVITY DATE: 08/14/2018
STAFF: Stephen Weis	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance inspection of the Fiat Chrysler Automotives (FCA) Viper Auto Assembly facility on Conner Street in Detroit. This FCA facility is scheduled for inspection in FY 2018.		
RESOLVED COMPLAINTS:		

Location:

Fiat Chrysler Automobiles
Conner Center (f/k/a Conner Avenue Viper Assembly Plant)
(SRN B2164)
20000 Conner Street
Detroit 48234

Date of Activity:

Tuesday, August 14, 2018

Personnel Present:

Steve Weis, DEQ-AQD Detroit Office
Norman Cary, Facility Maintenance Manager, Fiat Chrysler Conner Center

Purpose of Activity

A self-initiated inspection of the Fiat Chrysler Automobiles (FCA) Conner Center facility (hereinafter "Conner Center") in Detroit, which was formerly the Conner Avenue Viper Assembly Plant, was performed on Tuesday, August 14, 2018. The Conner Center facility was on my list of sources targeted for an inspection during FY 2018. The purpose of this inspection was to determine compliance of operations at the Conner Center facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), and with applicable Federal standards. The facility is not currently subject to any DEQ-AQD permits.

Facility Site Description

The Conner Center facility is located on the east side of the portion of Conner that runs north from East Outer Drive about ¼ mile east of Van Dyke. The facility property consists of a parcel approximately 27.5 acres in area that is bounded by Conner Street to the west, East State Fair Avenue to the south, the Bel Air Shopping Center and its associated property to the north, and the Great Lakes Water Authority's Northeast Water Treatment Plant/Northeast Wastewater Pumping Station facility (SRN K5392) to the east. The facility property includes the building that formerly housed the Viper Assembly operations, which is roughly 400,000 square feet in size, and parking areas. The building was built in 1965 by Champion Spark Plug to manufacture spark plugs.

The area around the Conner Center facility is a mix of residential, commercial, institutional and industrial/light industrial properties. Immediately to the west of the facility on the west side of Conner is St. John Providence Conner Creek Medical Center campus, which includes the Conner Creek Senior Living center, and a medical clinic called the East Medical Center is located to the south across East State Fair. The aforementioned Bel Air Shopping Center is located directly to the north, and the Bel Air 10 Luxury Cinema movie theater is situated adjacent to the northeast corner of the facility's property. There are residential neighborhoods located to the northwest and southwest of the facility. The closest residences are located approximately 200 yards to the west of the facility.

Facility Operations

The Conner Center facility was built in 1965 by Champion Spark Plug, and production of the ceramic insulation used in Champion spark plugs began at the facility in 1966. Champion ceased operations at the facility in the early 1990's, and Chrysler Corporation purchased the facility in 1995. The Viper and Prowler automobiles were assembled at the facility; the Prowler was assembled at the Conner Center facility from its introduction in 1997 until the vehicle was discontinued in 2002, and the Viper was assembled at the facility from late 1995 until August 31, 2017, when production of the Viper ended.

After Viper production was discontinued, FCA converted the facility from an automotive assembly operation to the Conner Center, which, per the FCA website, is "...an internal meeting and display space that will showcase the Company's concept and historical vehicle collection." The feature about the facility on FCA's website goes on to say that "...approximately 77,000 of the plant's nearly 400,000 square feet of floor space will be dedicated to displaying vehicles...", and that the facility's "...administrative offices will be converted into nearly 22,000 square feet of meeting space." It is mentioned that the building should be available for use by internal groups and departments in FCA in the second quarter of 2018. Some media articles are attached to this report that summarize the facility's changeover from a manufacturing facility to its current use as a meeting and automobile display space.

Inspection Narrative

I arrived at the facility just before 9:40am. After checking in at the facility's security gate, I was met by Norman Cary in front of the facility's main entrance. We went inside and began to tour the facility. Norman showed me the office area, which is in the front, or western, portion of the building. At the time of my visit, new carpet was being installed in some off the hallways, offices and conference rooms.

I asked Norman for an overview of the building and its operations. He told me that the building is around 400,000 square feet in area, and that it was originally built in 1965 by Champion Spark Plug and was used in the manufacture of spark plugs. He told me that Chrysler Corporation purchased the building in 1995, and that the Viper automobile was produced at the facility from 1996 until August 31, 2017. I asked Norman how the building is heated. He replied that the plant zones (this would be the former production area) are heated via a combination of four small ceiling mounted heaters, HVAC units, and some small natural gas heaters. The climate control/comfort air for the office and conference area of the building is currently provided by a natural gas-fired boiler and a chiller. This equipment is located in a room on the second floor of the office area. The chiller is a Trane Series R unit that has two electric-powered pumps; the unit provides air conditioning for the main office. The boiler, which was installed in 1965 when the building was constructed, is a Peerless Model 210-16-W (serial number 210-1796) natural gas-fired unit with a maximum rated heat input capacity of 3.15 MMBTU per hour. There is an air handler in the room that was also used to provide comfort air to the office and conference area. Norman told me that this unit has not been operational for several years, and that it is supposed to be dismantled and removed from the facility sometime on 2019. Norman said that facility staff are looking into adding another piece of equipment to provide heat for the office and conference area, and that this is still in the early planning stages. The new unit would be used to provide heat to the second floor of the office and conference area. Based on the size of the area to be heated, a HVAC-type furnace unit may be used, or a small boiler. I asked Norman to let DEQ-AQD Detroit office staff know what kind of heating unit the facility plans to install.

We then walked out to the plant area. Norman first showed me the area where the FCA automobile collection is displayed. The display area extends in back of the office area in roughly the western half of the former production plant area and runs the north to south length of the building. I asked Norman if there are any cold cleaners in use at the facility. He told me that there are no cold cleaners at the facility. FCA contracts with outside companies to clean the floors and restrooms, as well as to clean the display vehicles.

We then went to the southeast corner of the building, where the building maintenance are is located. The east side of the building is heated using three heaters that are located in a mezzanine area. Norman and I took a look at the heaters, which are identified at the facility as heater units 13, 14 and 15. The information plates on the units identify them as PF, Inc. units, model CR3-G-20, each having a Power Flame Burner rated at a maximum heat input capacity of 3.4 MMBTU per hour.

We returned to the office area of the facility, and after a brief conversation to summarize the site visit, I left the facility at 10:30am.

Permits/Regulations/Orders/Other

There are no active Permits to Install (PTIs) for FCA. When the Viper and Prowler vehicles were being assembled at the facility, these vehicles were produced at a low volume (six to eight vehicles per day). Due to the small production volumes and the related low amount of material usage (e.g. sealants, vehicle fluids) involved with the assembly operation, the company operated following the PTI exemption criteria put forth in Michigan Administrative Rules 284, 287 and 290. A letter dated February 5, 1997 was sent by the former Wayne County Air Quality Management Division to Chrysler that addresses the use of the exemption in lieu of obtaining a PTI. A copy of the letter is attached to this report for reference.

There were some permits issued by the Wayne County agency to Champion Spark Plug. Wayne County permit C-1107 was issued on April 11, 1969 and addressed the installation and operation of four direct-fired recuperative tunnel kilns that were used in the production of spark plug insulators. Wayne County permit C-4415 was issued on January 6, 1978 and addressed the replacement of the afterburner on the kilns. Wayne County permits C-5495 through 5497 were issued on July 3, 1980 and addressed the replacement of three dust collectors for the ceramic shaping operations associated with spark plug manufacture. All of this equipment was removed from use at the facility and dismantled when Chrysler began vehicle assembly operations. Thus, these Wayne County permits are no longer valid, and will be voided.

The combustion equipment at the facility is exempt from DEQ-AQD requirements by meeting the exemption criteria put forth in Administrative Rule 282(b)(1); in the case of the Peerless boiler, based on its installation date, that unit also has grandfathered status relative to the state air regulations. Based on the maximum rated heat input capacities of the boiler and the three heaters in the mezzanine area on the east side of the building, the potential NOx emissions from this equipment is approximately 5.6 tons per year. The Conner Center facility should be a true minor source of air emissions.

Compliance Determination

Based upon the results of the site visit and a review of information relating to the process equipment and operations at the facility, the FCA Conner Center facility in Detroit appears to be **in compliance** with applicable rules and regulations. At this time, the process equipment and operations at the facility do not appear to be subject to DEQ-AQD permitting requirements.

Attachments to this report: copies of articles describing the transition of the facility from an assembly plant to the Conner Center; a copy of the letter sent by the Wayne County air agency to Chrysler that addresses the permit exemptions that applied to the assembly operations.

NAME Steve WeissDATE 1/17/19SUPERVISOR JK