



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 13, 2022

VIA E-MAIL AND U.S. MAIL

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 May 6, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection/review of Concentrator West PM/P10/PM2.5 Stack Test Report of Stellantis N.V., FCA US LLC Warren Truck Assembly Plant (WTAP or Wren Truck or "the company") located at 21500 Mound Road, Warren, Michigan 48091-4840. The purpose of this report review/inspection 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 May 6, 2022, stack test report review of FCA WTAP, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-RTOWEST ^θ	Major Offset Source, LAER PTI No. 13-19B, FG-RTOWEST, SC I.6 ^β	FCA WTAP failed to meet the PM2.5 emission limit (0.123 pph) based upon April 19, 2022 test report sampled on or about February 14, 2022. ^{π, μ}
^θ FG-RTOWEST (EUECOATWEST, EUPRIMERWEST, EUTOPCOATWEST, EUPURGECLEANWEST): The flexible group covers NOx, PM, PM10, and PM2.5 emissions from the west paint shop concentrator and west RTO.		
^β PM2.5 emission limit is 0.123 pounds of PM2.5 per hour from West Concentrator portion of FG-RTOWEST.		
^π FCA US LLC, Warren Truck Assembly Plant West Paint Shop: SVRTOWEST and SVBTHCONCWEST Source Testing Report. RWDI#2102459 dated April 19, 2022. Sampled on or about February 14, 2022, by RWDI USA LLC, 2239 Star Court, Rochester Hills, Michigan 48309. Sampling of the West Concentrators (clean air exhaust).		
^μ Particulate matter (PM/PM10/PM2.5) was sampled following procedures outlined in U.S. EPA Reference Method 5 and Method 202 (Condensable Particulate Matter) for the RTO outlet and concentrator clean air exhaust outlet. US EPA Reference Method 201A (RM 201A) was not used. Hence, the test results for PM2.5 are biased high. RM 201A is still an option available to demonstrate compliance with the limit of 0.123 pounds of PM2.5 per hour from West Concentrator portion of FG-RTOWEST.		

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 the cited

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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 June 3, 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 48092-2793, 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 e-mail address below.

Sincerely,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
konanahalli@michigan.gov

cc: Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Joyce Zhu, EGLE
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