



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 9, 2021

VIA E-MAIL

Mr. James Gholston, Plant Manager
FCA US LLC – Sterling Heights Assembly Plant
38111 Van Dyke Avenue.
Sterling Heights, MI 48312

SRN: B7248, Macomb County

Dear Mr. Gholston:

VIOLATION NOTICE

On August 4, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a review of the recently submitted revised test results (July 30, 2021) for stack testing conducted at FCA US LLC – Sterling Heights Assembly Plant South Paint Shop (SPS) located at 38111 Van Dyke Avenue, Sterling Heights, Michigan. The stack testing was conducted on May 19-21, 2021, as required by Permit to Install (PTI) number 27-17C, Special Condition FG-REPAIR BOX (V.2). The purpose of the stack testing was to determine the facility'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 27-17C, special condition FG-REPAIR BOX (I.4).

During the review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-REPAIR BOX	PTI No. 27-17C, Special Conditions FG-REPAIR BOX (I.4 & I.5)	The test results for PM10/PM2.5 from FG-REPAIR BOX are 0.161 lb./hr. and 0.083 lb./hr. while operating the repair booth and not operating the booth respectively. These results are higher than the 0.052 lb./hr. of the corresponding emission limits.

On May 19-21, 2021, a stack test was conducted on FCA US LLC – Sterling Heights Assembly Plant South Paint Shop's flexible group, FG-REPAIR BOX. The stack test was required by PTI No. 27-17C, Special Condition FG-REPAIR BOX (V.2). The company submitted initial test results on July 16, 2021 and a revised test results dated July 30, 2021, which showed that the PM10/PM2.5 actual emission rate of 0.161 lb./hr. measured while FG-REPAIR BOX was operating and the 0.083 lb./hr. actual emission rate measured while FG-REPAIR BOX was not operating; the results exceeded the 0.052 lb./hr. allowable emission rate specified in PTI No. 27-17C, Special Conditions FG-REPAIR BOX (I.4 & I.5).

Mr. James Gholston
FCA US LLC – Sterling Heights Assembly Plant
August 9, 2021
Page 2

This constitutes a violation of PTI No. 27-17C, Special Conditions FG-REPAIR BOX (I.4 & I.5), which prohibit emissions of PM10 as well as PM2.5 from FG-REPAIR BOX in excess of the maximum allowable emission rates listed in Table I.4 & I.5 or specified as a condition of an air use permit.

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

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 30, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the company 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 violation cited above and for the cooperation that was extended to me during the stack testing. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below or email pingar@michigan.gov.

Sincerely,



Remilando Pinga
Senior Environmental Engineer
Air Quality Division
586-854-4697

Enclosures

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Mr. Adekunle Sanni, FCA US LLC