

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

B275752784

FACILITY: FCA US LLC WARREN STAMPING PLANT		SRN / ID: B2757
LOCATION: 22800 MOUND RD., WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Greg Karageozian , Environmental Engineer		ACTIVITY DATE: 12/10/2019
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Level 2 Target Inspection		
RESOLVED COMPLAINTS:		

On December 10, 2019, I conducted a level 2 inspection at FCA US Warren Stamping Plant. The facility is located at 22800 Mound Road, Warren, Michigan 48091. The purpose of the inspection 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 administrative rules, the facility's Renewable Operating Permit (ROP) No. MI-ROP-B2757-2019. During the inspection, I was accompanied by Mr. Greg Karageozian, facility contact person. Prior to conducting the walk-through inspection, I initially showed my credentials and stated the purpose of the inspection.

The facility is considered a major source under the Clean Air Act of 1990, and operates under a Title V permit, ROP No. MI-ROP-B2757-2019 because it is adjacent to FCA US Warren Truck Assembly Plant and both are under common ownership and control of FCA US (Chrysler). Moreover, as an evidence of interconnected manufacturing operations, there is a tunnel to Warren Truck Assembly Plant from the stamping plant for transport of the stamped auto parts.

A major stationary source is defined as all of the pollutant emitting activities that are (1) located on one or more contiguous or adjacent properties; (2) are under common control of the same person (or persons under common control); and (3) belong to a single major industrial grouping or are supporting the major industrial group (as determined by the Major Group codes in the Standard Industrial Classification Manual).

FCA US (Chrysler) Warren Stamping Plant manufactures automotive parts such as door panels, hoods, lift gates, fenders, inner panels, etc. for FCA automotive assembly plants. Currently, the facility ships parts for the FCA trucks in Sterling Heights Assembly and Warren Truck Assembly, the Jeep, the Jeep Grand Cherokee, the Wrangler, the Pacifica minivan, etc. During inspection, I observed several presses and sub-assembly areas. Inside the stamping plant, all materials flow from North to South.

The ROP was recently revised with effective date of February 26, 2019. The ROP contained 2 emission units - EUCARP-SHOP, EUHIGHLIGHT; and 2 flexible groups - FG-RULE290, FG-RULE287(2)(c).

EUCARP-SHOP – this emission unit pertains to the carpentry shop activities that included sawing, sanding, and woodworking equipment. The equipment are

controlled by dry filters/collector. During inspection, I observed several stations that included the saw, planer, grinder, sander, etc., with individual capture hoods ducted to a common bag filter system. The bag filters are connected to a hopper system discharging into a particulate matter collection drum. Per ROP No. MI-ROP-B2757-2019(C)(EUCARP-SHOP(VI.1)), the facility conducts quarterly inspections on the integrity of the filters and keeps records of the inspection results/activities.

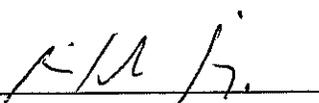
EUHIGHLIGHT – refers to the application of highlighter fluid for quality control purposes. I observed around 20 plus stations where the fluid is wiped on the sample parts to inspect for defects. Per ROP No. MI-ROP-B2757-2019(C)(EUHIGHLIGHT (VI)), the facility kept monthly and monthly 12-month rolling total records of VOC emission rates. Per ROP No. MI-ROP-B2757-2019(C)(EUHIGHLIGHT(I)), the submitted records showed the highest monthly 12-month rolling total VOC emission rate from January 2018 through November 2019, was 1.35 tpy for April 2019 and less than the 5.62 tpy permit limit.

FG-RULE290 – refers to any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(2)(c). In this facility, EU-ADHESIVE-STATIONS and EU-BLANK-WASH belong to this flexible group. Per Mr. Karageozian, blank wash is diluted in water and used to lubricate panels prior to stamping. In the sub-assembly area, the adhesives under EU-ADHESIVE-STATIONS are pumped from 55-gallon drums into applicators for use either as sealers or structural adhesives. As structural adhesive, the sealer is usually pumped into the space between the outer and inner panels. The facility keeps records of adhesive usages and calculates VOC emission rates of components to comply with AQD Administrative Rule R 336.1290. The facility reported the FY2018 and 2019 year-to-date total VOC emission rates at 0.88 tpy and 0.57 ton respectively.

FG-RULE287(2)(c) – refers to any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(2)(c). EUMAINTPT-DCK is the primary emission unit under this flexible group. Per ROP No. MI-ROP-B2757-2019(D)(FG-RULE287(2)(c)(IV.1)), I observed dry filters to control particulate emissions from the maintenance spray booth. The filters appeared to be operating properly as I did not observe gaps in between filters. Per ROP No. MI-ROP-B2757-2019(D)(FG-RULE287(2)(c)(IV.1)), the facility submitted records that showed less than 200 gallons of coating usage per month and in compliance with this applicable requirement.

Overall, I did not find any non-compliance issues during inspection.

NAME



DATE

1/7/2020

SUPERVISOR

