



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

December 18, 2017

Mr. Tyree Minner, Plant Manager  
FCA US LLC – Mack Avenue Engine Plant  
11570 East Warren Avenue  
Detroit, Michigan 48214

SRN: M4085, Wayne County

Dear Mr. Minner:

**VIOLATION NOTICE**

On October 30, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of FCA US LLC (FCA), Mack Avenue Engine Plant (MAEP) located at 11570 Warren Avenue, Detroit, Michigan. The purpose of this inspection was to determine FCA MAEP'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 Renewable Operating Permit (ROP) number MI-ROP-M4085-2015a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-HOTTESTS	MI-ROP-M4085-2015a, FG-HOTTESTS, Special Condition (SC) VIII. 1.	Stack conditions do not meet permit requirements

MI-ROP-M4085-2015a, FG-HOTTESTS, SC VIII.1 specifies that the stack for FG-HOTTESTS (SV-HOTTESTS) shall discharge unobstructed vertically and not have a diameter greater than 12 inches or a discharge height less than 50 feet. During the inspection on October 30, 2017, SV-HOTTESTS did not meet MI-ROP-M4085-2015a requirements. During the inspection the hot test stand stack appeared to be approximately 32 feet above ground surface and 12 inches in diameter with rain cap installed.

Within email correspondence dated November 30, 2017 from Mr. Keith Jones, FCA MAEP claims that FG-HOTTESTS stack dimensions included in Permit to Install (PTI) 261-99B were for additional hottest stands that were ultimately not installed. While PTI 261-99A contained conditions for hottest stands, there were no stack conditions associated with the hot test stands. During issuance of PTI 261-99B, PTI 261-99A was voided and stack conditions cited in PTI 261-99B apply going forward (and were ultimately

Mr. Tyree Minner  
Page 2  
December 18, 2017

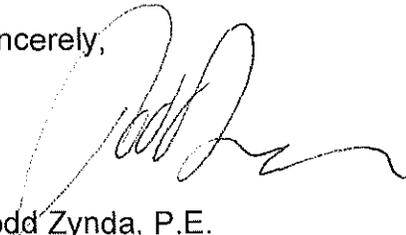
incorporated into MI-ROP-M4085-2015a). As a result, the stack installed for the hot test stands is a violation of MI-ROP-M4085-2015a, FG-HOTTESTS, SC VIII.1.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 8, 2017 (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.

If FCA MAEP 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 my inspection of FCA MAEP. 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.

Sincerely,



Todd Zynda, P.E.  
Senior Environmental Engineer  
Air Quality Division  
313-456-2761

cc: Mr. Paul Max, City of Detroit BSEED  
cc/via e-mail: Mr. Keith Jones, FCA  
Mr. Chukwuemeka Bosah, FCA  
Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ