



September 11, 2020

Via U.S. Mail and E-mail

Mr. Adam Bognar
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
27700 Donald Court
Warren, MI 48092
BognarA1@michigan.gov

**RE: FCA US LLC (FCA) – Technology Center SRN: 1436
Response to Violation Notice**

Dear Mr. Bognar:

This letter responds to AQD's August 21, 2020 Violation Notice ("VN"), which alleged noncompliance with the Renewable Operating Permit ("ROP") for FCA's Chrysler Technology Center ("CTC"). As explained below, FCA took swift action to ensure that: (1) the equipment in question quickly returned to compliance; and (2) additional procedures and training will prevent recurrence of this issue going forward.

Background

In Section 2 of the CTC ROP, flexible group FG-RULE278(2)(c) contains conditions for three different emission units, including EU-PRODDSGNPAINT. EU-PRODDSGNPAINT contains two paint booths used for periodic painting in the product design area. Each of these booths operates with an air flow system where air enters the booth through the ceiling and exits through grates in the floor. Underneath the floor grates, each of these two booths has 14 dry filters that reduce emissions from the exiting air flow.

The Issue

The VN addresses an issue identified during your inspection of the CTC facility. In particular, the VN stated that "on July 29, 2020, the AQD staff observed operation of a paint booth while the dry filters associated with the dry filter control system were not installed." The VN referred to one of the two paint booths in EU-PRODDSGNPAINT. Although the booth was not operating during your inspection, it contained a part that had been previously painted in the booth. FCA staff confirmed that the dry filters in that booth were not in position at the time of the inspection.

The other booth in EU-PRODDSGNPAINT was also inspected and its dry filters were properly positioned beneath the floor grates.

Initial Corrective Action

Following EGLE's inspection, no painting took place in the booth pending FCA's investigation of the condition of the filters. FCA opened and inspected the filter system and observed that approximately half of the 14 dry filters were not in the proper locations below the floor grates in that booth. Instead, the displaced air filters had been moved to the side, as is customary for an equipment inspection. New dry filters were installed before the subsequent resumption of operations on July 31.

FCA's Investigation

Although FCA monitors and records the volume of coating applied in the EU-PRODDSGNPAINT booths as well as system maintenance, the company was unable to pinpoint when the dry filter displacement took place. FCA confirmed that the dry filters in question were previously replaced on February 13, 2020, but it is unclear whether the displacement took place before the March 23 suspension of operations (due to COVID-19), during the subsequent idle period, or after the June 8 resumption of operations. Thus, while both booths in EU-PRODDSGNPAINT had limited use over the past six months, it is difficult to estimate the deviation period or its impact. Instead, FCA focused on taking steps to ensure that this issue never occurs again.

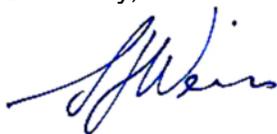
Moving Forward

Given the episodic use of the two paint booths in EU-PRODDSGNPAINT, FCA determined that the best way to avoid recurrence of this issue is requiring additional monitoring and recordkeeping from any employee that attempts to use a booth. Thus, prior to operating one of these "limited use" paint booths, all employees must physically inspect and confirm the proper placement of the dry filters beneath the floor grates and record this observation. The log of these inspections will ensure compliance by any person operating the booth. The paint booth operators as well as their supervisors have already received training on this new procedure.

Conclusion

FCA regrets the partial displacement of dry filters in an EU-PRODDSGNPAINT booth and trusts that the foregoing actions to ensure compliance will resolve the VN as well as prevent recurrence. Please contact me at 248-944-1027 or stuart.weiss@fcagroup.com with any questions.

Sincerely,



Stuart Weiss
Air Compliance Specialist

C: Ms. Jenine Camilleri (camillerij@michigan.gov)
Ms. Joyce Zhu (ZHUU@michigan.gov)
Mr. Al Johnston, FCA Corporate EHS
Mr. Mark Werthman, FCA US LLC – Chrysler Technology Center
Mr. Matt Read, FCA OGC