



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GRETHER  
DIRECTOR

February 22, 2018

Mr. Zachary Leroux, Plant Manager  
FCA US LLC, Jefferson North Assembly Plant  
2101 Connor Avenue  
Detroit, MI 48215

SRN: N2155, Wayne County

Dear Mr. Leroux:

**VIOLATION NOTICE**

On November 8, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of FCA US LLC, Jefferson North Assembly Plant located at 2101 Connor Avenue, Detroit, Michigan. The purpose of this inspection was to determine 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-N2155-2017.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-TOPCOAT3	Rule 336.1213(3)(c)(i) Special Condition VII.2	Failure to report a deviation for downtime on 6/8/17 from 8:44 am to 9:02 am. Documentation provided for conveyor P60 indicates conveyor increases from 12 to 15 vehicles during the reported downtime. Additional documentation provided for the APIC Mercury/FL Status does not clearly explain the 3 vehicle increase. See table 1 below.

**Table 1**

Time Frame	P60 Conveyor Reading	APIC Mercury/FL Status
8:30-8:40 am	-1 unit	+2 units (8:34, 8:38am)
8:40-8:50 am	+3 units	+1 unit (8:42am)
8:50-9:40 am	No change	Nothing listed

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10:10-10:20 am	+2 units	+2 unit
10:20-10:30 am	-1 unit	+1 unit

In addition, please provide an explanation for the following:

For the February 10, 2017 event activating interlocks for 21 minutes on E-coat Oven A Incinerator, please explain why the conveyor counters showed vehicles in the process while the deviation discussion page states there were zero units in the e-coat oven at that time.

How long does it take to process a vehicle in the color 2 booth, and separately how long does it take to cure a vehicle in color 2 oven?

Please explain if an interlock is activated during a painting process or curing process and the vehicle is only half finished for an extended period (20-30 plus minutes), how does this effect the outcome of the painting and curing? Does the vehicle need to be repainted? If so, what about paint overlap issues for a partially painted vehicle that gets repainted? It has been our understanding from other automobile assembly manufacturers that painting and curing of paint does finish out during control equipment malfunctions, but generally no new vehicles are introduced. Please explain how and why the FCA process is different. Is there a future test where the AQD could observe the verification of the interlock process engaged with partially painted/cured vehicles and then restarted to complete a saleable vehicle?

Recorded documentation for the March 8, 2017 Color 3 oven shows difficulty maintaining temperature which created a P-65 conveyor run permissive fault. However, deviation reported information states no deviation – 3 hour average not triggered. These two statements for this event do not seem to correlate, so did the process continue to operate or did the run permissive fault stop the process?

Based upon the information obtained during the inspection, there was not a way to correlate the conveyor accumulator records and FL status records to the control device malfunction/bypass damper for date and time. Please explain how the timing of these events are verified. Future requests regarding equipment downtime and conveyor accumulators will want to be verified unless deviations are reported.

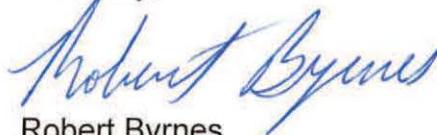
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 15 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes 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.

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If 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 violation cited above and for the cooperation that was extended to me during my inspection of November 8, 2017. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Robert Byrnes  
Senior Environmental Engineer  
Air Quality Division  
517-275-0439

cc: Mr. Paul Max, City of Detroit BSEED  
cc/via e-mail: 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