



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

November 3, 2021

Mr. Michael Brieda, Plant Manager
FCA US LLC – Detroit Assembly Complex Mack
4000 Saint Jean Street
Detroit, MI 48214

SRN: N2155, Wayne County

Dear Mr. Brieda:

VIOLATION NOTICE

On October 28, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), investigated a complaint of nuisance odors alleged to be the result of operations at FCA US LLC – Detroit Assembly Complex Mack, located at 4000 Saint Jean Street, Detroit, Michigan. The purpose of this investigation was to determine FCA US LLC – Detroit Assembly Complex Mack’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; Permit to Install (PTI) No. 14-19a; and to investigate a complaint of nuisance odors received on October 28, 2021.

The investigation was performed by Mr. Jonathan Lamb of the AQD from approximately 6:30 PM to 7:25 PM on October 28, 2021. During this investigation, the following violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
FG-AUTOASSEMBLY	R 336.1901(b); PTI No. 14-19a, General Condition (GC) 6	Persistent and objectionable paint/solvent odors of moderate to strong intensity (Level 3 and 4) observed emitting from the facility and impacting nearby neighborhoods.

During the investigation performed on October 28, 2021, AQD staff observed persistent and objectionable paint/solvent odors of moderate to strong intensity (Level 3 and 4) impacting residential areas downwind of the facility which were determined to be emitting from FCA US LLC – Detroit Assembly Complex Mack. In AQD staff’s professional judgment, the odors observed were of sufficient intensity, duration, and frequency to constitute a violation of Rule 901(b), and General Condition 6 of PTI No. 14-19a: an “unreasonable interference with the comfortable enjoyment of life and property.”

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 24, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date 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, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If FCA US LLC – Detroit Assembly Complex Mack 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. 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,

Robert Byrnes

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

cc: Ms. Rebecca Payne, EHS, FCA US LLC
Mr. Paul Diven, EHS, FCA US LLC
Ms. Crystal Rogers, City of Detroit BSEED
Mr. Hosam N. Hassanien, City of Detroit BSEED
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE
Mr. Jonathan Lamb, EGLE