

Via Electronic and U.S. Mail

October 14, 2022

Via Email and U.S. Mail

Mr. Robert Byrnes
Michigan EGLE-Air Quality Division
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202
BYRNESR@michigan.gov



**RE: FCA US LLC (FCA) — Detroit Assembly Complex-Mack Assembly
Response to October 4, 2022 Violation Notice**

Dear Mr. Byrnes:

This letter timely responds to AQD's October 4, 2022 Violation Notice ("VN") alleging nuisance "odors of moderate intensity" near the Mack Assembly Plant between 3:05-3:55 PM on September 30, 2022. AQD staff reported "Level 3" odors during that interval based on a scale of 1-5, with Level 3 representing the lowest odor threshold deemed to represent a potential violation of Rule 901.

As you are aware, FCA has already proposed a long-term odor control technology to address the potential odor concern at Mack. Specifically, FCA has a pending application to modify the Mack facility's permit-to-install that, once finalized by AQD, will enable FCA to install and operate a new regenerative thermal oxidizer ("RTO2"). FCA continues to view the new RTO2 as the long-term solution for potential nuisance odors.

In the interim, FCA has also piloted and implemented odor neutralization technologies at Mack. The current odor neutralization system has functioned well, especially after a "shake down" process to optimize its performance over the spring and summer. FCA staff, however, recently detected the diminishing performance of the dosing regulator during system inspections and maintenance. This regulator proportions the proprietary CupriDyne Clean® odor-neutralizing ingredient with water to form the mixture pumped to various points in the assembly plant for odor neutralization. After a period of use and observation, the original dosing regulator appeared undersized, so FCA ordered two upgraded versions of the regulator, one for immediate replacement and the other as a back-up. When the new equipment arrived, FCA replaced the existing regulator with the more robust version to ensure improved system performance.

When FCA replaced the older equipment on Friday, September 30, the interruption of the odor neutralization system lasted roughly 2.5 hours. That same afternoon, the odor issues cited by AQD occurred. Thus, while the replacement of the original dosing regulator with a newer and more robust version will improve the overall performance of the odor neutralization technology at Mack, the equipment replacement project may have unexpectedly resulted in short term odors near the facility.

In response to this issue, FCA has already upgraded the dosing regulator unit, which should result in more reliable and consistent odor neutralization. Further, FCA has already obtained a second regulator as a backup unit that sits ready for quick installation if needed. By implementing these measures, FCA has taken the necessary steps to prevent recurrence until the operation of RTO2. In addition, FCA respectfully suggests that AQD consider the potential applicability of Rule 915 and Rule 916 to this situation, especially since FCA personnel noted a non-nuisance odor reading during the period in question.

Please contact Matt Read, in FCA's Office of General Counsel, at 248-385-8093 if you have any questions.

Sincerely,



Marnie Levergood
Plant Manager
FCA US LLC, Detroit Assembly Complex Mack

C: Mr. Bob Byrnes, AQD
Ms. Jenine Camilleri, AQD
Ms. Erin Moran, AQD
Mr. Paul Diven, Mack Environmental Specialist
Mr. Garrett Stricker, EHS Assembly Division Lead
Ms. Sandra Walker, FCA Corporate EHS
Mr. Al Johnston, FCA Corporate EHS
Mr. Matt Read, FCA OGC
Mr. Kurt Kissling, Warner Norcross + Judd LLP