

Via Electronic and U.S. Mail

June 1, 2023

Via Email and U.S. Mail

Mr. Jonathan Lamb
Michigan EGLE-Air Quality Division
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202
LAMBJ1@michigan.gov

**RE: FCA US LLC (FCA) — Detroit Assembly Complex-Mack Assembly
Response to May 11, 2023 Violation Notice**

Dear Mr. Lamb:

On behalf of FCA US LLC, this letter timely responds to AQD's May 11, 2023 Violation Notice ("VN") alleging nuisance odors near the Detroit Assembly Complex - Mack Assembly Plant ("DACM") between "approximately 8:00 PM to 8:50 PM" on the evening of May 9, 2023.

Although the VN requests that FCA take certain actions in response to the allegation, FCA notes that it did not learn about this issue until the next day, May 10. By that time, FCA was unable to verify the presence of a nuisance odor or identify what (if anything) was different and potentially contributing to unwanted odor levels on the west side of the DACM facility.

Upon learning of the concern, the company undertook a series of inspections to investigate potential odors. After FCA staff walked along the DACM property line and confirmed that a nuisance odor was not present, FCA staff then inspected the DACM operations for potential causes. In doing so, FCA did not identify a clear cause of a nuisance odor.

That said, FCA did identify isolated leaks from emission control system ducts inside the DACM "penthouse," which is the top floor of the paint shop and effectively located on the roof. Specifically, loose connections in the penthouse were identified and then resealed to reduce the potential for leakage of untreated exhaust in that area. When combined with the prevailing easterly winds around that time, it is possible that these penthouse losses may have contributed to a potential nuisance odor, especially if the penthouse door was also open for extended times to allow for roof access by contractors. FCA's ducting repairs should address concerns related to these types of leaks in the penthouse going forward.

As you are aware, FCA has already proposed a long-term odor control technology to address the potential for nuisance odors at Mack. Specifically, FCA is nearing the completion of constructing a new regenerative thermal oxidizer ("RTO2") that should commence operation by June 30, 2023. FCA continues to view the new RTO2 as the long-term solution for potential nuisance odors.

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

Sincerely,



David Askew
Plant Logistics Manager
FCA US LLC, Detroit Assembly Complex Mack

- C: Dr. April Wendling, AQD
Mr. Bob Byrnes, AQD
Ms. Jenine Camilleri, AQD
Ms. Erin Moran, AQD
Mr. Paul Diven, DACM Environmental Specialist
Mr. Adam Misuraca, DACM EHS
Ms. Sandra Walker, FCA Corporate EHS
Mr. Al Johnston, FCA Corporate EHS
Mr. Matt Read, FCA OGC
Mr. Kurt Kissling, Warner Norcross + Judd LLP