
FCA US LLC

RESPONSE TO COMMENTS DOCUMENT

June 23, 2021

PERMIT No. 13-19B



Gretchen Whitmer, Governor

Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy

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I. PUBLIC PARTICIPATION PROCESS

Permit to Install (PTI) application No. 13-19B, for FCA US LLC (FCA) Warren Truck Assembly Plant (Warren Truck), is for modifications to an already approved, but not completely installed, project. This project included installation of a new paint shop and upgrades to equipment on an existing automotive assembly line located at 21500 Mount Road, Warren, Michigan. The public participation process involved providing information for public review (including a Technical Fact Sheet, and a Proposed Project Summary), an informational meeting, a public hearing, and the receipt of public comments on staff's analysis of the application and the proposed permit.

On April 28, 2021, copies of the Notice of Air Pollution Comment Period and Public Hearing, the Technical Fact Sheet, the Proposed Project Summary, and the draft terms and conditions were placed on the Michigan Department of Environment, Great Lakes, and Energy (EGLE or Department), Air Quality Division (AQD) Home Page (<https://www.michigan.gov/air>). The AQD also sent 68 emails and mailed 13 letters to persons who had previously expressed interest and had provided complete contact information. In addition, a notice announcing the public comment period, virtual public informational meeting (if requested), and virtual public hearing (if requested) was placed in the Warren Weekly. The notice provided pertinent information regarding the proposed action; where to find information; the date, time, and if requested in writing, where information on how to join the virtual public informational meeting and virtual public hearing; the closing date of the respective public comment period; and how to submit comments.

The virtual hearing was requested in writing on May 27, 2021. A virtual informational meeting and public hearing were held by the AQD on June 2, 2021, starting at 6:00 p.m. A panel of AQD representatives was available to answer questions regarding the proposed project via an online web meeting. The informational meeting began at 6:00 p.m. and concluded at approximately 7:00 p.m. when the hearing began. During the hearing, Ms. Jenifer Dixon served as the Hearings Officer and Dr. Eduardo Olaguer, AQD Assistant Director, as the appointed Decision Maker. Only comments on the proposed permit action were received. Approximately 17 people attended the virtual meeting with 2 providing oral comments. The public hearing concluded at 7:12 p.m.

No written comments were received during the public comment period nor at the hearing. Two oral comments were received via voicemail.

The remainder of this document is a listing of the significant comments received during the public comment period and hearing regarding the proposed permit and the Department's response. The first section discusses the comments received that resulted in changes to the final permit terms and conditions and the basis for each change. The last section discusses the Department's response to all other significant comments that did not result in changes to the final permit.

II. SUMMARY OF COMMENTS RESULTING IN CHANGES TO THE PERMIT

No comments were received that resulted in changes to the permit.

III. SUMMARY OF SIGNIFICANT COMMENTS

A. Public Health and Environment Concerns

Comment

FCA should pay for residents' medical treatments if they want to pollute more.

AQD Response

Though the AQD does regulate sources that emit air contaminants, those regulations do not include the ability to require a permittee to pay for residents' medical treatments.

The AQD's role is to utilize the state and federal air quality rules and regulations that are in place to protect public health and the environment, including the National Ambient Air Quality Standards (NAAQS) and the AQD established health-based screening levels.

All emissions from the project meet their applicable standards and are protective of public health and the environment.

B. Air Toxics and Risk Assessment

Comment

What are the VOCs being emitted for this permit?

AQD Response

An automotive assembly plant can use a large number of materials that contain a variety of VOCs. Part of the review for a permit application is to evaluate these compounds, some of which are toxic air contaminants (TACs), at their worst-case emission rates. These compounds are not among the seven criteria pollutants that have National Ambient Air Quality Standards (NAAQS). Instead, these compounds are individually evaluated against their respective health-based screening levels.

The AQD sets health-based screening levels for TACs at conservatively low air concentrations to protect even sensitive groups based on toxicological studies. In the event a TAC does not have a health-based screening level, an AQD toxicologist reviews that TAC to verify its emissions are below any health concerns.

The list of VOCs evaluated for this application are in the following table.

Volatile Organic Compounds Evaluated for FCA Warren Truck	
Formaldehyde	Methylcyclohexane
benzo(a)pyrene	toluene
Dibenzo(a,h)anthracene	Chlorobenzene
Carbon tetrachloride	pentane
3-Methylchloranthrene	Heptan-2-one
Benz(a)anthracene	hexane
propylene glycol	Diisopropanolamine
7,12-Dimethylbenz(a)anthracene	2-butoxyethanol
ethyl alcohol	ethylene glycol monobutyl ether acetate
Methanol	ethylene glycol monoethyl ether
isopropyl alcohol	Anthracene
Chloroform	butyl carbitol
n-propyl alcohol	4-Hydroxy-4-Methylpentan-2-one
n-butanol	n-butyl acetate
amyl alcohol	Pyrene
Benzene	2-Methyl-1-butanol
Vinyl chloride	Ethyl Acetate
Acetaldehyde	Heptane
1,1-Dichloroethane	5,8,11,13,16,19 Hexaoxatricosane
isobutyl alcohol	Benzo(g,h,i)perylene
Isobutyraldehyde	Indeno(1,2,3-cd)pyrene
1,2 dichloropropane	Benzo(k)fluoranthene
methyl ethyl ketone	Benzo(b)fluoranthene
1,1,2-Trichloroethane	Fluoranthene
1,1,2,2 tetrachloroethane	Acenaphthylene
Methyl Methacrylate	Chrysene
Acenaphthene	1,2,3 Trimethylbenzene
Phenanthrene	1,2,3 Trimethylbenzene
Fluorene	1,3 Dichlorobenzene 1
Naphthalene	1,3-Dichloropropene
2-Methylnaphthalene	Propionic Acid, N-Butyl ester
1,2 Dichlorobenzene 1	n-pentyl propionate
1,2,4-trimethylbenzene	ethyl-3-ethoxypropionate
Isobutyl isobutyrate	Phenoxyisopropanol
Cumene	N-methylpyrrolidone
Styrene	dimethyl glutarate
Ethylbenzene	mixed xylenes

triethanolamine	1-propoxy-2-propanol
2-Ethylhexyl acetate	propylene glycol n-butyl ether (alpha isomer)
Propylbenzene	Naphtha
N-Propyl Propionate	Stoddard Solvent
1,4 Dichlorobenzene 1	propylene glycol n-butyl ether (beta isomer)
Ethylene dibromide	4 6-dimethyl 2-heptanone
butane	Propane-1,2-diol, propoxylated
1,3-Butadiene	Trimethylbenzene
Acrolein	dipropylene glycol methyl ether
1,2 dichloroethane	heavy alkylate naphtha
ethylene glycol	Petroleum Distillates
propylene glycol monomethyl ether	Hydrotreated Light Distillate
dimethylethanolamine	hydrotreated heavy naphtha
methyl isobutyl ketone	Naphtha, hydrotreated light
Methyl amyl alcohol	Light Solvent Naphtha
isopropyl acetate	Heavy Aromatic Naphtha
1-Methoxy-2-propyl Acetate	light aromatic solvent naphtha (petroleum)
1,3,5 Trimethylbenzene	2-Methoxy-1-propyl Acetate
2,6-Dimethyl-4-Heptanol	Ketimine
Diisobutyl Ketone	

C. Odor Concerns

Comment

This facility affects residents on the Detroit side, but Detroit residents have had difficulty having environmental issues, most having to do with odors, addressed because this facility is right near the border of Warren and Detroit. Detroit residents need someone we can contact to address issues from this facility.

AQD Response

The AQD understands there may be detectable odors in the areas surrounding facilities and strives to address resident complaints. We also understand there may be some confusion when a facility sits near district borders.

This facility is located just north of the Warren/Detroit border and is under the jurisdiction of the Warren District Office. For odors or other air emission questions during business hours, please contact AQD staff at the Warren District Office at 586-506-9564.

During non-business hours, residents should contact the Pollution Emergency Alerting System (PEAS) at 800-292-4706. This telephone number is operated by EGLE and is staffed 24 hours per day. Information received by the PEAS operator is quickly forwarded to the appropriate agencies.

The AQD has also recently implemented an online form to file complaints, which can be found on our website, www.michigan.gov/air, on the right under, 'Submit an Air Quality Complaint'.

If a Detroit resident calls the Detroit District Office to submit a complaint regarding the Warren Truck facility, the complainant will be directed to the Warren District Office. Complaints submitted online or via email will also be directed to the Warren District Office.

D. Permit Requirements

Monitoring

Comment

How can residents be assured that FCA will be in compliance with the permit requirements?

AQD Response

The permit requires FCA to submit emissions reports to the AQD that include actual emissions, as well as supporting information for how those emissions were calculated. AQD staff performs a **detailed** review of these submittals including reviewing usage rates, test data, emission calculations, operational data, and any other data required to verify the accuracy of the information in the reports. The public may access the information submitted through [Freedom of Information Act](#) (FOIA) requests.

The facility is part of a stationary source that is considered a major source of emissions and will be incorporated into the existing Renewable Operating Permit (ROP) for this stationary source. The ROP requires the company to certify they are in compliance with the terms and conditions of their permit semi-annually. This certification is legally binding and the responsible official of any facility that has an ROP can be held liable if the information is falsified.

The AQD conducts inspections at least once every two years for facilities the size of FCA Warren Truck. As part of these inspections, the District Inspector will look at past inspection reports, permits, applicable federal regulations, compliance history, emissions reports, past stack tests, and any correspondence. Inspections typically include a walkthrough of the facility to examine processes and process equipment, including control and monitoring equipment, as well as going over required operational and emissions records. One purpose of the inspection is to help ensure the facility is operating equipment and following the proper work practices to minimize emissions as much as possible.

The inspector will determine a facility's compliance with any permit conditions and any applicable rules and regulations. If a facility is determined to not be in compliance, corrective action will be taken, potentially including violation notices and fines.

Prepared by: David Thompson