

Proposed Project Summaries

FCA US, LLC

The Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD), is asking for comments from the public on two proposed Permits to Install (PTI) Applications for FCA US, LLC (FCA). The AQD will accept comments on the proposed PTIs until close of the comment period on September 18, 2020. We will review all comments before we make a final decision on both proposals.

What is FCA proposing to do?

FCA is proposing two separate projects:

1. Modify a permitted automotive assembly line under construction at the Detroit Assembly Complex Mack Plant (Mack). Modifications include changes to various fuel burning equipment, storage tanks and no longer installing a new sealer oven.

These proposed modifications result in slight decreases in volatile organic compounds (VOCs), oxides of nitrogen (NO_x), and Greenhouse Gas (GHG) emissions and slight increases in carbon monoxide (CO), particulate matter (PM), PM equal to or less than 10 microns in diameter (PM₁₀), and PM equal to or less than 2.5 microns in diameter (PM_{2.5}).

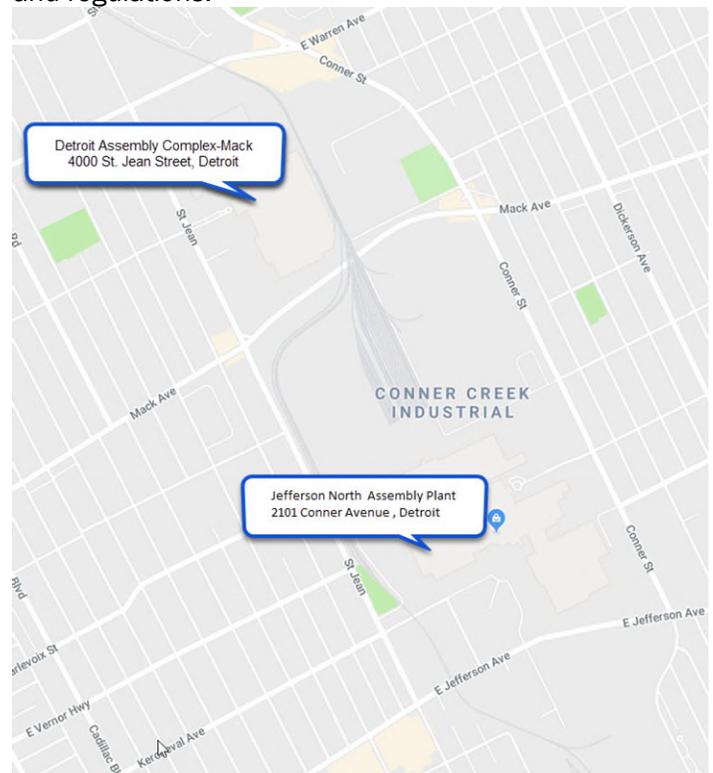
2. Installation of a new tutone coating line and performing changes to existing equipment at the Jefferson North Assembly Plant (JNAP). Changes include moving the rapid repair operations and refurbishment of various pieces of equipment, such as automation, application equipment, and conveyor systems.

For the proposed JNAP project, emission increases in VOCs, NO_x, CO, sulfur dioxide (SO₂), PM₁₀, PM_{2.5}, and GHGs are expected from the installation of the new tutone coating line and moving the rapid repair operations.

What is a PTI and why are they needed?

A PTI, commonly known as an air use permit, is required for projects that involve installing, constructing, reconstructing, relocating, or modifying most processes or process equipment that emit, or may emit, air contaminants, such as the modifications at Mack and the new equipment and changes at JNAP that FCA is proposing.

The AQD has reviewed the applications and written proposed permit conditions that include requirements to make sure the projects comply with all applicable air laws and regulations.



What is the current air quality in the area?

The United States Environmental Protection Agency has developed health-protective standards for specific air pollutants. These standards are called the National Ambient Air Quality Standards (NAAQS). There are NAAQS for SO₂, Nitrogen Dioxide (NO₂), CO, PM₁₀, PM_{2.5}, ozone, and lead. NAAQS are developed from research studies and set at levels to protect public health. This includes health protection for sensitive groups like those with heart and lung problems.

Mack and JNAP are in Wayne County, Michigan, which is currently meeting all NAAQS except for SO₂ and ozone. Ozone is regulated through its precursor's NO_x and VOCs. There is a portion of Wayne County not meeting the NAAQS for SO₂; however, Mack and JNAP are not located in that area.

The AQD operates 12 air monitoring stations in Wayne County. The AQD also has nearby monitoring stations in Oakland and Macomb Counties. The Wayne County stations measure criteria pollutants as well as some air toxics, and the Oakland and Macomb County stations measure ozone and fine particulate matter. The following figures show the trends for ozone (Fig. 1), and PM_{2.5} (Fig 2). Please note, the purpose of the air monitoring stations is to assess the regional or area-wide air quality and is not used to determine if a specific source is in compliance with their air permit.

Figure 1. The fourth high of the 8-hour ozone concentrations.

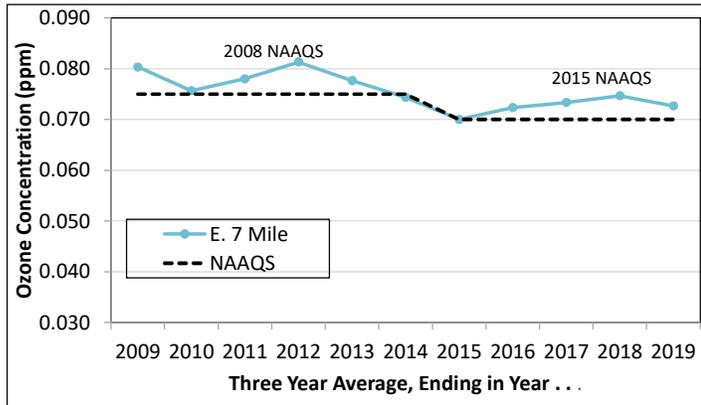
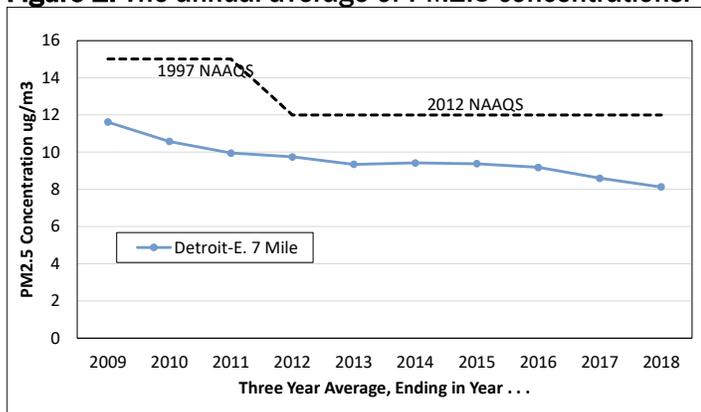


Figure 2. The annual average of PM_{2.5} concentrations.



Will the facility meet air quality standards?

Computer models were used to look at the expected impacts of the proposed projects' emissions on the air quality in the area surrounding the Mack and JNAP facilities. This type of computer model is called an air dispersion model and considers many factors, such as quantity and type of emissions, prevailing wind direction

and other factors. The models showed the expected impacts of the emissions, plus the existing monitored levels, are less than the applicable NAAQS for NO₂, PM₁₀, and PM_{2.5}.

Michigan has developed health-based levels for additional pollutants referred to as toxic air contaminants (TACs) under its Air Toxics rules. The proposed TAC emissions from each project would also comply with the AQD's health-based screening levels.

What is a "nonattainment area"?

Areas of the state below the NAAQS concentration level are called 'attainment areas. Nonattainment areas are those with concentrations over the NAAQS level. An area is designated as nonattainment when it is not meeting an air quality standard. This is determined using a number of factors including a three-year average of air monitor data and at times, air dispersion modeling.

Why can emissions be increased in a nonattainment area?

The air pollution control rules for a nonattainment area are designed to allow new growth while still bringing the area back into attainment. One way to achieve this is through Nonattainment New Source Review (NNSR) permitting. Providing emissions offsets is one requirement of NNSR permitting. Offsets are federally enforceable reductions in actual emissions at a rate greater than the proposed increase in those emissions. NNSR permitting also requires a company to take restrictions to comply with the Lowest Achievable Emission Rate (LAER) for the nonattainment pollutant(s) or precursor(s).

FCA has demonstrated the proposed Mack project can meet the requirements of NNSR permitting. The proposed project at JNAP is not subject to NNSR.

What about water, noise, traffic, and zoning concerns?

The AQD evaluates potential air emissions from the proposed facility to determine if they comply with the air quality rules and regulations. The AQD does not have the authority to regulate noise or traffic outside the facility or the authority to evaluate compliance with local zoning requirements. The current air permit for Mack included a condition requested by FCA to identify additional projects for the local community. A plan for additional projects, some of which addressed traffic and noise, was submitted to, and approved by the AQD.

Where can I find more information?

There are several ways to find more information about the PTI applications: The public notice webpage has

information about the proposed permits in the Technical Fact Sheet, including:

- A summary of the reviews completed by the AQD staff.
- How the projects will affect air quality and public health.
- A summary of what the proposed permits would require FCA to do.
- A summary of the allowed emissions that are included in the proposed permits.
- The rules and regulations that apply to the projects.
- Example emission calculations.

AQD staff can also provide additional information upon request.

Summary:

The AQD has reviewed the PTI applications and prepared two proposed permit conditions. If the proposed permits are approved, they will ensure FCA meets the applicable air quality requirements. Therefore, we recommend approving the permits.

However, before the AQD acts on the PTI applications, we are requesting comments from the public. A virtual informational session will be held on August 25, 2020, starting at 6:00 p.m. A second virtual informational session and public hearing will be held on September 9, 2020, starting at 6:00 p.m. More information and the link to the virtual informational sessions and public hearing are available on the AQD's public notice website.

The AQD will review all comments received during the public comment period and virtual public hearing, then decide whether to approve, approve with modifications or deny the proposed PTI applications. If approved, the AQD may add or change permit conditions based on the comments received.

Tell us what you think in any of these ways:

We use public comment periods and hearings to get community input.

- **Comment via email** by September 18, 2020 to EGLE-aqd-ptipubliccomments@Michigan.gov
- **Comment via voicemail** by calling 517-284-0900
- **Send written comments** by September 18, 2020 to Ms. Annette Switzer, Permit Section Manager, EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760
- **Attend the virtual Informational Session** to be held on August 25, 2020, starting at 6:00 p.m.
- **Attend the virtual public hearing** to be held on September 9, 2020, starting at 6:00 p.m.

[“View an Example”](#) of how to comment. You may also want to read the [“Public Hearings - What you should know”](#) card. These documents can be found at <http://www.deq.state.mi.us/aps/cwerp.shtml>.

Who can I contact?

For more information about the proposed permit, please contact David Thompson, AQD, at: ThompsonD22@Michigan.gov or 517-582-5095

Michigan's Environmental Justice Policy promotes the fair, non-discriminatory treatment, and meaningful involvement of Michigan's residents regarding the development, implementation, and enforcement of environmental laws, regulations, and policies by this state. Fair, non-discriminatory treatment intends that no group of people, including racial, ethnic, or low-income populations, will bear a disproportionately greater burden resulting from environmental laws, regulations, policies, and decision-making. Meaningful involvement of residents ensures an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health.