

## PROPOSED PROJECT SUMMARY

### FCA US LLC DETROIT ASSEMBLY COMPLEX- MACK - DETROIT, WAYNE COUNTY, MICHIGAN

#### FCA US LLC DETROIT ASSEMBLY COMPLEX-MACK

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), is asking for comments from the public on a proposed Permit to Install (PTI) for FCA US LLC Detroit Assembly Complex-Mack (FCA Mack). The AQD will accept comments on the proposed PTI until the close of the comment period on July 23, 2024. We will review all comments before we make a final decision on the proposal.

#### WHAT IS FCA PROPOSING TO DO?

FCA Mack operates an existing automotive manufacturing process at the Detroit Assembly Complex facility located at 4000 Saint Jean Street, in Detroit (Figure 1).

FCA Mack is proposing to modify their current [PTI 14-19A](#), as required by [Consent Order No. 2022-16](#). The modifications are referred to as the RTO2 Project and include the following:

- Adding requirements for the installation and continuous operation of a second regenerative thermal oxidizer (RTO2).
- Modifying ductwork from existing equipment and routing to RTO2.
- Increases to emission limits for particulate matter (PM), PM less than 10 microns (PM10), and PM less than 2.5 microns (PM2.5), as a result of the RTO2 Project.

#### WHAT IS A PTI AND WHY IS ONE 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 what FCA Mack is proposing to do.

As a result of the consent order, FCA Mack legally agreed to install and operate an additional control device called RTO2. They also agreed to change

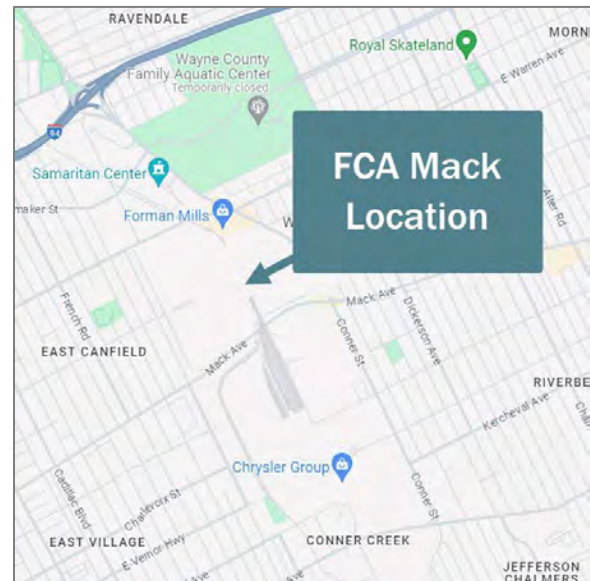


Figure 1: Location of FCA Detroit Assembly Plant - Mack

exhaust venting to the RTO2 stack for certain equipment to address odors. These changes require a modification to their permit to incorporate the necessary requirements.

Although the additional RTO will control some pollutants, it is an additional source of PM, PM10, and PM2.5 emissions.

We have reviewed the application and written proposed permit conditions that include requirements to make sure the project complies with all applicable air rules and regulations.

## WHY IS THE PROPOSED PERMIT OPEN FOR PUBLIC COMMENT?

There has been historical public interest in the FCA Mack facility. Accordingly, the AQD has determined that the public should have the opportunity to provide comment on the proposed permit conditions.

## WHAT IS THE CURRENT AIR QUALITY IN THE AREA?

The United States Environmental Protection Agency (USEPA) has developed health-protective standards for specific air pollutants. These standards are called the National Ambient Air Quality Standards (NAAQS).

There are NAAQS for [some pollutants](#), including sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), PM<sub>10</sub>, PM<sub>2.5</sub>, ozone, and lead.

Poor air quality from high levels of pollution can cause health problems. The 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.

The facility is located in the portion of Wayne County, Michigan which is currently meeting all of the NAAQS. The AQD operates 11 [air monitoring stations](#) in Wayne County. The Wayne County stations measure a variety of criteria pollutants, air toxics, other pollutants, and meteorological parameters. There are other air monitoring stations in nearby Macomb and Oakland Counties. FCA Mack also operates an ambient air monitoring station for a limited number of parameters. The purpose of the air monitoring stations is to assess the regional or area-wide air quality and are not used to determine if a specific source complies with their air permit.

## WILL AIR QUALITY STANDARDS BE MET?

A computer model was used to look at the expected impacts of the increase in emissions from the

proposed project on the air quality in the area surrounding FCA Mack. This type of computer model is called an air dispersion model and considers many factors, such as amount and type of emissions, prevailing wind direction, and other factors.

The model showed that the expected impacts of NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are less than the applicable NAAQS standards.

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

## WHAT DO I NEED TO KNOW ABOUT THE PROPOSED PERMIT?

The proposed permit has specific requirements FCA Mack would have to follow if the permit is approved. Key areas you may be interested in, or that you may want more details on, include:

- **Emission limits** – amount of specific air pollutants allowed to be released.
- **Material limits** – the maximum amount of fuel allowed to be used.
- **Process restrictions** – requirements to minimize air pollutants.
- **Monitoring and Recordkeeping** – monitoring of equipment and records that would be kept showing the process is meeting the requirements of their permit.

## WHAT ABOUT THOSE WITH PRE-EXISTING LUNG DISEASE WHO SPEND TIME NEAR THE PROPOSED FACILITY?

The AQD used the computer air model to look specifically at the expected impacts of particulate emissions to see if existing breathing problems may

worsen. The facility emissions plus the existing background levels are less than the NAAQS, which are designed to protect sensitive groups, even those with pre-existing breathing problems.

### WHAT ABOUT NOISE, TRAFFIC, AND ZONING?

We evaluate the potential air emissions from the proposed facility to determine if they comply with the air quality rules and regulations. The AQD does not have authority to regulate noise or traffic outside the facility and does not have authority to evaluate compliance with local zoning requirements.

### WAS ENVIRONMENTAL JUSTICE CONSIDERED FOR THIS PROJECT?

Part of opening a proposed permit for public comment involves evaluating the community around the proposed project, including environmental justice, translation, and other community-specific concerns. Full details of how we consider this in permitting can be found in “[Including Environmental Justice: Air Permitting in Michigan](#)”. The language evaluation looks at the number of people who speak English “less than very well” within a 1-mile radius of the proposed project’s location. This is required by EGLE’s [Limited English Proficiency Plan](#) using an environmental justice screening tool like USEPA’s [EJSCREEN](#). The evaluation found that translation was not needed.

### WHERE CAN I FIND MORE INFORMATION?

Other information, like the [Technical Fact Sheet](#) and the [proposed permit conditions](#) can be found at [Michigan.gov/EGLEAirPublicNotice](https://Michigan.gov/EGLEAirPublicNotice), choose “Applications Open for Comment.” FCA Mack’s application and important correspondence with the AQD can be found under PTI application No. APP-2022-0125 on the [Other Applications of Interest](#) page.

The Technical Fact Sheet has additional details about the project and how it will meet the rules and regulations, such as:

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

AQD staff can provide additional information upon request.

### SUMMARY:

We have reviewed the application submitted by FCA Mack and prepared a proposed permit. If the proposed permit is approved, it will ensure the facility meets the applicable air quality requirements. Therefore, we recommend approving the proposed permit.

However, before we act on the PTI application, we are requesting comments from the public. We will review all comments received during the public comment period and public hearing, then decide whether to approve, approve with modifications or deny the proposed permit.

### WHO CAN I CONTACT?

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

### WHAT PUBLIC COMMENTS CAN EGLE CONSIDER?

Comments from the public are very important. But it is also important to know the law is clear about what we can and cannot consider when we make our decision. Some examples are below.

| What we can consider  | What we can't consider  |
|---|---|
| <ul style="list-style-type: none"> <li>✓ Technical mistakes in the review</li> <li>✓ Grammar and spelling mistakes</li> <li>✓ Other rules the action should consider and why</li> <li>✓ Why the action will not follow the rules</li> </ul> | <ul style="list-style-type: none"> <li>• Air, land, or water issues not part of the project</li> <li>• Indoor air pollution</li> <li>• Traffic</li> <li>• Noise and lights</li> <li>• Zoning issues</li> <li>• Anything unrelated to the project</li> </ul> |

### HOW CAN I MAKE A COMMENT?

The AQD welcomes comments from the public during the comment period. Prior to making a comment, it is a good idea to “[View an Example](#)” of how to do it. You may also want to read the “[Public Hearings - What you should know](#)” card.

Documents pertaining to FCA can be found at: [Michigan.gov/EGLEAirPublicNotice](https://Michigan.gov/EGLEAirPublicNotice)

Comments must be received by **July 23, 2024**.



#### Via email

[EGLE-AQD-PTIPublicComments@Michigan.gov](mailto:EGLE-AQD-PTIPublicComments@Michigan.gov)



#### Via US mail

Cindy Smith, Permit Section Manager, EGLE,  
AQD, P.O. Box 30260  
Lansing, MI 48909-7760



#### Via voicemail

by calling 517-284-0900



#### At the Public Hearing.

The in-person public hearing on July 17, 2024, starting at 6:00 p.m. at the Detroit Southeastern High School, 3030 Fairview Street, Detroit, Michigan 48214. The meeting and hearing will also be broadcast. The public may join the broadcast at: <https://bit.ly/3R6caHW>. Call in to listen only at 636-651-3142 and us conference code 374288. EGLE staff will be available to answer questions and provide assistance if needed.

EGLE promotes the equitable treatment and meaningful involvement of Michigan’s residents regarding the development, implementation, and enforcement of laws, regulations, and policies. Equitable treatment means that no group of people bears a disproportionate share of the negative consequences resulting from governmental, industrial, or commercial operations and policies. Meaningful involvement means all people have an opportunity to participate in decisions that affect their environment and/or health.

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