

Proposed Project Summary

FCA US LLC

The Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD), is asking for comments from the public on a proposed air Permit to Install (PTI) Application for FCA US LLC (FCA), Warren Truck Assembly Plant (Warren Truck). The AQD will accept comments on the proposed PTI until the close of the comment period on June 14, 2021. We will review all comments before we make a final decision on the proposal.

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 FCA's proposed new equipment and changes at Warren Truck.

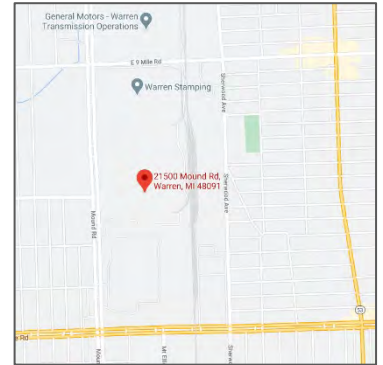
The AQD has reviewed the application and written proposed permit conditions that includes requirements to make sure the project complies with all applicable air laws and regulations.

What is FCA proposing to do?

FCA is proposing to modify an already approved, but not completely installed, project ([PTI No. 13-19A](#)) that included installation of a new paint shop and upgrades to existing equipment on an existing automotive assembly line at Warren Truck.

Proposed modifications to the previously permitted project include changes to various equipment, such as adding a boiler; updating some existing permit conditions for emission and natural gas usage limits; changing the location of new pollution control equipment; and updating some exhaust stack sizes.

The current body shop and final assembly operations will service vehicles from both the new and existing paint shops. The production capacity is not anticipated to increase. Additionally, there



will be various natural gas combustion equipment that will be installed for the new paint shop. This includes ovens, air supply houses, air make-up unit, hot water generators, emergency engines, space heaters and a concentrator and regenerative thermal oxidizer (RTO). For the existing automotive assembly operations, new and replacement natural gas fired combustion equipment will be installed, such as RTOs, hot water generators, and air supply houses.

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). 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.

There are NAAQS for sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter equal to or less than 10 microns in diameter (PM₁₀), particulate matter equal to or less than 2.5 microns in diameter (PM_{2.5}), ozone, and lead.

When a pollutant is not meeting the NAAQS, it is said to be in nonattainment. Macomb County is meeting all the NAAQS with the exception of ozone. [Ozone](#) is created after oxides of nitrogen (NO_x) and volatile organic compound (VOC) emissions are released in the air and mix with heat and sunlight.

The AQD operates two [air monitoring stations](#) in Macomb County that measure [criteria pollutants](#), including one in Warren that measures ozone. A monitoring site in Oak Park measures ozone and PM_{2.5}, and a nearby monitoring station in Wayne County measures NO₂ and PM_{2.5} at East 7 Mile Road. The following figures show the trends for ozone (Fig. 1), NO₂ (Fig. 2) and PM_{2.5} (Fig. 3). Concentrations of these pollutants in the outdoor air are consistently below the NAAQS, with the exception of ozone.

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 complying with their air permit.

Figure 1. 8-hour Ozone Concentrations.

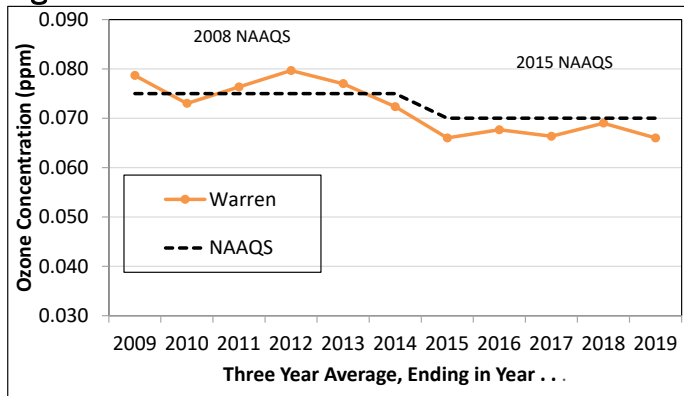


Figure 2. 1-hour NO₂ Concentrations

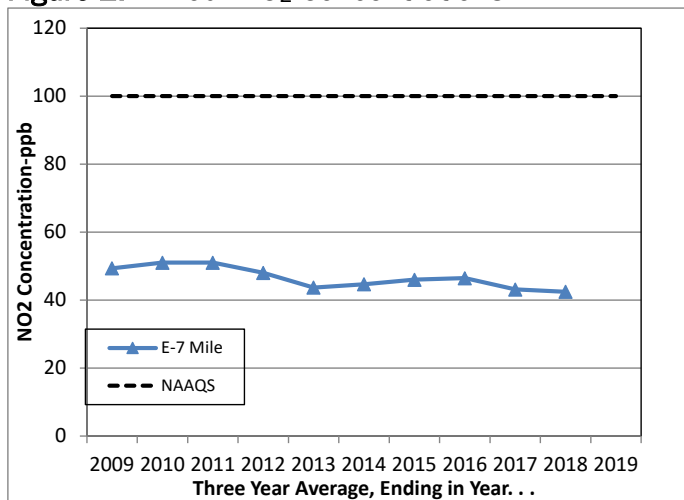
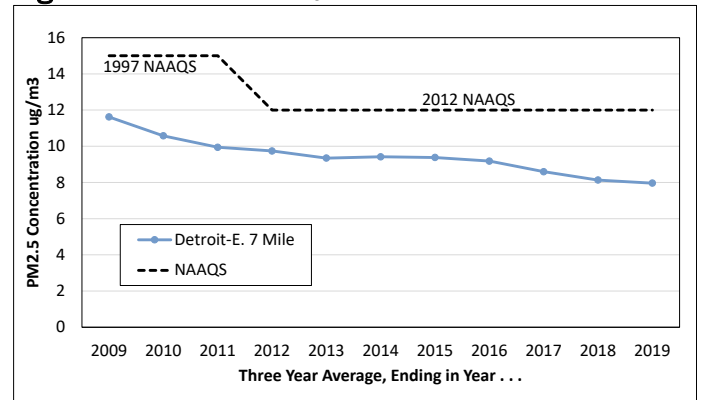


Figure 3. Annual PM_{2.5} Concentrations.



Will the facility meet air quality standards?

A computer program was used to look at how the requested emissions will affect the outdoor air around Warren Truck. This type of computer program is called an “air dispersion model” and considers many factors, such as how much and what kind of emissions, wind direction and other factors. In addition to what the air monitors are measuring, the models showed that expected impacts of emissions are less than the applicable NAAQS for NO₂, PM₁₀, and PM_{2.5}.

Michigan also has health-based levels for additional pollutants called toxic air contaminants (TACs). The proposed TAC emissions from the project also comply with the AQD’s allowed health-based screening levels.

Why can emissions be increased in a nonattainment area?

Although Macomb County is in nonattainment for ozone, the air pollution control rules for nonattainment areas are designed to allow for new growth while still bringing the area back into attainment. If a project, like the one FCA is proposing, exceeds a certain amount of emissions for a nonattainment pollutant, in this case ozone, it is subject to a more stringent permit review called “Nonattainment New Source Review (NNSR)” permitting. The proposed project exceeds that level of emissions for VOCs, which help to create ozone; therefore, this project must go through NNSR permitting.

In the permit application, FCA showed the proposed project can meet the requirements of NNSR

permitting. Part of this includes the requirement to “offset” the requested increase in VOCs by lowering VOCs by a larger amount somewhere else in the nonattainment area. FCA will offset the requested increase of VOCs by taking lower permitted limits for VOCs on existing equipment at Warren Truck. These reductions are included in the proposed permit conditions.

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 over noise or traffic outside the facility or authority over local zoning requirements.

Where can I find more information?

There is more information available on the PTI application. The [public notice webpage](#) has information about the proposed permit in the Technical Fact Sheet, including:

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

AQD staff can also provide additional information upon request.

Summary:

The AQD has reviewed the PTI application and prepared proposed permit conditions. If the proposed permit is approved, it will ensure FCA

meets the applicable air quality requirements. Therefore, we recommend approving the permit.

However, before the AQD acts on the PTI application, we are requesting comments from the public. If requested, a virtual informational session and public hearing will be held on June 2, 2021, starting at 6:00 p.m. More information and the link to the virtual informational session 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, if held, then decide whether to approve, approve with changes, or deny the proposed application. 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. You may provide a comment:



EGLE-AQD-PTIPublicComments@michigan.gov



EGLE, Air Quality Division, Permit Section, P.O. Box 30260, Lansing, MI 48909-7760



517-284-0900



If requested, at the public hearing on June 2, 2021

[“View an Example”](#) of how to comment. You may also want to read the [“Public Hearings - What you should know”](#) card.

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.