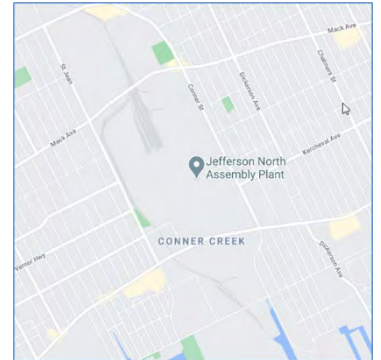


Proposed Project Summary

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), Jefferson North Assembly Plant (JNAP). The AQD will accept comments on the proposed PTI until close of the comment period on March 22, 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 the new equipment and changes at JNAP that FCA is proposing.

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

What is FCA proposing to do?

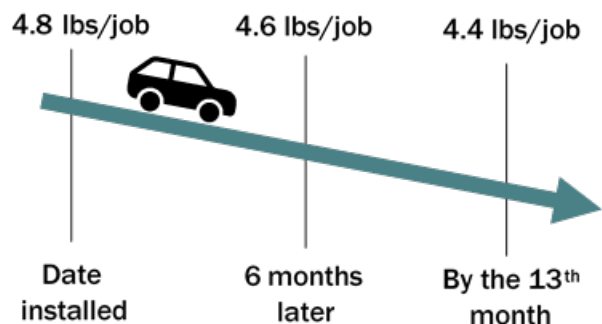
FCA is proposing to install a new tutone coating line and make changes to existing equipment at JNAP. Increases in volatile organic compounds (VOCs), oxides of nitrogen (NOx), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter less than 10 microns (PM₁₀), particulate matter less than 2.5 microns (PM_{2.5}), and greenhouse gases (GHGs) are expected from the installation of the new coating line and moving the rapid repair operations.

Didn't JNAP just have an application out for comment?

Yes. This application was part of a combined public comment period with PTI Application No. 14-19A for FCA Detroit Assembly Complex Mack (Mack). A decision has been made on the Mack application. A second public comment period is necessary for the JNAP application because of proposed changes to the draft permit. Changes made to the draft permit are:

1. The addition of updated conditions for four existing emission units,
2. Additional recordkeeping and reporting.
3. To allow 12 months after installation for the average amount of volatile organic compounds per job to decrease from the current 4.8 pounds per job to 4.4 pounds per job.

Figure 1: Average pounds of VOCs per job if permit approved as is.



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.

When a pollutant is not meeting the NAAQS, it is said to be in nonattainment. All of Wayne County is not meeting the NAAQS for ozone. After NO_x and VOC emissions are released in the air and mixed with heat and sunlight, ozone is created. Additionally, a portion of Wayne County is not meeting the NAAQS for sulfur dioxide (SO₂); however, JNAP is not located in that area.

The AQD operates 12 air monitoring stations in Wayne County that measure [criteria pollutants](#) as well as some air toxics. The following figures show the trends for ozone (Fig. 2), and PM_{2.5} (Fig 3). 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. FCA started operating an air monitoring station in November for NO_x, PM_{2.5}, and Meteorological data. Data is not yet available from that site.

Figure 2. The fourth high of the 8-hour ozone concentrations.

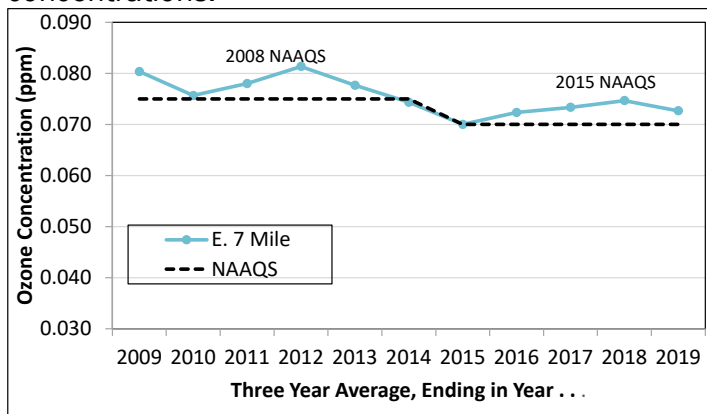
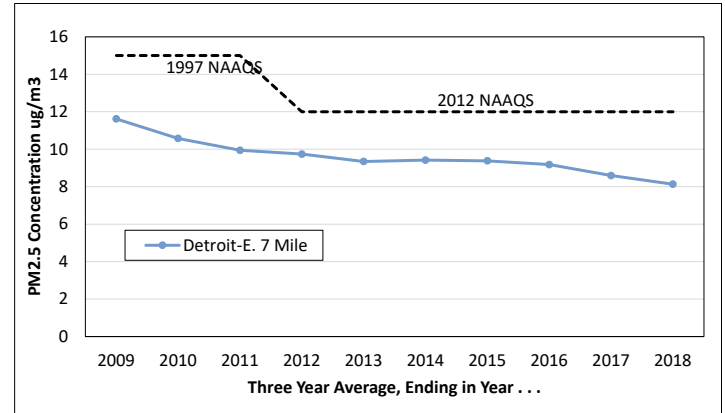


Figure 3. The annual average of PM_{2.5} concentrations.



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 the JNAP facility. 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. The models showed that expected impacts of the emissions, in addition to what the air monitors are measuring, are less than the applicable NAAQS for NO₂, PM₁₀, and PM_{2.5}.

Michigan has developed health-based levels for additional pollutants called toxic air contaminants (TACs). The proposed TAC emissions from the project 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. An area is designated as nonattainment when it is not meeting an air quality standard. This is determined using several 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. Projects that exceed certain thresholds for nonattainment pollutants are subject to Nonattainment New Source Review (NNSR) permitting.

FCA has demonstrated that emissions from the proposed project do not exceed the thresholds for NOx or VOCs and are 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 over noise or traffic outside the facility or authority over local zoning requirements.

Where can I find more information?

There are several ways to find more information about 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 the 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. A virtual informational session and public hearing will be held on March 16, 2021, 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 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, Michigan 48909- 7760



517-284-0900



At the public hearing on March 16, 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.