

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF THE DIRECTOR

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In the matter of administrative proceedings )  
against **CHRYSLER GROUP, LLC**, a )  
corporation organized under the laws of the )  
State of Michigan and doing business at the )  
Jefferson North Assembly Plant, 2101 )  
Conner Avenue in the City of Detroit, County )  
of Wayne, State of Michigan )

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AQD No. 22-2013

SRN: N2155

STIPULATION FOR ENTRY OF FINAL ORDER  
BY CONSENT

This proceeding resulted from allegations by the Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) against Chrysler Group, LLC (Company), a Michigan corporation doing business at the Jefferson North Assembly Plant located at 2101 Conner Avenue in the City of Detroit, County of Wayne, State of Michigan with State Registration Number (SRN) N2155 (Facility). The MDEQ alleges that the Company has violated Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, Michigan Administrative Code (MAC), 1980 AACRS, R 336.1910 (Rule 910) and various requirements outlined in Renewable Operating Permit (ROP) Number MI-ROP-N2155-2010. Specifically, the MDEQ alleges that the Company operated five (5) separate thermal oxidizers used to control air pollution at temperatures below permit requirements. Furthermore, the MDEQ alleges that the Company failed to timely report certain thermal oxidizer temperature excursions under 40 Code of Federal Regulations (CFR) 64.9(a)(2)(i). These allegations are detailed in Violation Notices dated October 4, 2012, January 17, 2013 and March 27, 2013, all referred to herein as the Violation Notices, and were addressed in the responses thereto submitted by the Company, dated November 13, 2012, December 20, 2012, February 11, 2013, February 28, 2013, and April 17, 2013. The Company and MDEQ stipulate to the termination of this proceeding by entry of a Stipulation for Entry of a Final Order by Consent (Consent Order).

The Company and MDEQ stipulate as follows:

1. The Natural Resources and Environmental Protection Act, 1994 PA 451 (Act 451), MCL 324.101 *et seq.* is an act that controls pollution to protect the environment and natural resources in this State.
2. Article II, Pollution Control, Part 55 of Act 451 (Part 55), MCL 324.5501 *et seq.* provides for air pollution control regulations in this State.
3. The MDEQ was created as a principal department within the Executive Branch of the State of Michigan pursuant to Executive Order 2011-1 and has all statutory authority, powers, duties, functions and responsibilities to administer and enforce all provisions of Part 55.
4. The Director has delegated authority to the Chief of the AQD (AQD Chief) to enter into this Consent Order.
5. The termination of this matter by a Consent Order pursuant to Section 5528 of Part 55 is proper and acceptable.
6. The Company and the MDEQ agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by the Company that the law has been violated.
7. This Consent Order becomes effective on the date of execution (effective date of this Consent Order) by the AQD Chief.
8. The Company shall achieve compliance with the aforementioned regulations in accordance with the requirements contained in this Consent Order.

#### COMPLIANCE PROGRAM AND IMPLEMENTATION SCHEDULE

9. A. Quality Improvement Plan
  1. On and after the effective date of this Consent Order, the Company shall fully comply with its Quality Improvement Plan (QIP) for the five thermal oxidizers used for pollution control at the Facility. The QIP is attached as Exhibit A, incorporated by reference and made an enforceable part of this Consent Order.
  2. On and after the effective date of this Consent Order, any changes or updates to the QIP, as reasonably proposed by the Company, shall be promptly submitted to the AQD Detroit District Supervisor for approval. Upon approval and notification to the Company, the revised QIP shall be attached and become an enforceable part of this Consent Order.

B. Thermal Oxidizer Temperature Limitations

1. On and after the effective date of this Consent Order, the Company shall comply with the thermal oxidizer temperature limitations specified in ROP Number MI-ROP-N2155-2010 and any subsequent permit revisions during the term of this Consent Order.

SUPPLEMENTAL ENVIRONMENTAL PROJECT

10. The Company agrees to undertake the Supplemental Environmental Project (SEP) described in Exhibit B which is attached, incorporated by reference and made enforceable under this Consent Order. Performance of the SEP will benefit the environment and is a project which the Company is not otherwise legally required to perform. The Company agrees to implement the SEP in accordance with the details specified in Exhibit B and the following terms and conditions:

A. The total expenditure for the SEP is estimated to be \$49,000 as provided below. All costs of the SEP shall be the responsibility of the Company. If the actual expenditures for the SEP after it is fully implemented are less than 90% of \$49,000, then the Company is subject to a stipulated penalty of up to \$24,000 depending on how much the actual expenditures for the fully implemented SEP are less than 90% of \$49,000. Payment of any stipulated penalty shall be made as outlined in paragraphs 10 and 14.

B. The plan included as Exhibit B contains a schedule, including specific dates for the implementation of the SEP. The Company shall fully implement all aspects of the SEP within the specified schedule.

C. The Company certifies that the Company is not otherwise required by any local, state, or federal statute, regulation, rule, order, decree, permit, or other law or agreement, to develop or implement the SEP activities specified in Exhibit B. The Company further certifies that the Company has not received, and is not presently negotiating to receive, a credit for the SEP as part of any other enforcement action or any grant from Michigan, the U.S. Environmental Protection Agency (EPA) or any other entity.

D. In the event the Company fails to fully and completely implement the SEP as provided here, the MDEQ will provide written notice to the Company describing the nature of the deficiency. The Company shall have thirty (30) days from receipt of the notice to submit documentation to the AQD Detroit District Supervisor demonstrating that the deficiency has been corrected. In the event the deficiency is not corrected, the Company will be notified and the Company shall be in violation of this Consent Order and required to pay a stipulated penalty of up to \$24,000.00 to the MDEQ, subject to the requirements of paragraphs 10 and 14. The amount of the stipulated penalty may be reduced or waived by the MDEQ if the Company made good faith and timely efforts to complete the SEP. Payment of stipulated penalties under the terms of this paragraph shall satisfy the Company's obligation to complete

the SEP under this Consent Order. Payment of any stipulated penalty shall be made as outlined in paragraphs 10 and 14.

E. The Company agrees that any public statement, oral or written, making reference to the SEP shall include the following language: "This project was undertaken in connection with the settlement of an enforcement action taken by the Michigan Department of Environmental Quality for alleged violations of the Clean Air Act."

F. After the effective date of this Consent Order, until completion of all activities specified in Exhibit B, the Company shall provide the AQD Detroit District Supervisor with a progress report every three months. Each progress report shall include a description of the SEP activities the Company completed in the prior three months.

G. No later than thirty (30) days after the completion of all activities specified in Exhibit B, the Company shall submit written certification of completion of the SEP to the AQD Detroit Michigan District Supervisor demonstrating that all SEP activities specified in Exhibit B have been completed in accordance with the terms and conditions of this Consent Order and Exhibit B. The certification shall be accompanied by appropriate documentation (such as invoices or receipts) to verify the total expenditure as a result of implementing the activities specified under Exhibit B.

#### GENERAL PROVISIONS

11. This Consent Order in no way affects the Company's responsibility to comply with any other applicable state, federal, or local laws or regulations, including without limitation, any amendments to the federal Clean Air Act, 42 USC 7401 *et seq.*, Act 451, Part 55 or their rules and regulations, or to the State Implementation Plan.

12. This Consent Order constitutes a civil settlement and satisfaction as to the resolution of the violations specifically addressed herein; however, it does not resolve any criminal action that may result from these same violations.

13. Within thirty (30) days after the effective date of this Consent Order, the Company shall pay to the General Fund of the State of Michigan, in the form of a check made payable to the "State of Michigan" and delivered to the Michigan Department of Environmental Quality, Financial and Business Services Division, Revenue Control, P.O. Box 30657, Lansing, Michigan 48909-8157, a settlement amount of \$21,000.00 which includes AQD costs for investigation and enforcement. This total settlement amount shall be paid within thirty (30) days of the effective date of this Consent Order. To ensure proper

credit, all payments made pursuant to this Consent Order shall include the Agreement Identification No. AQD40025 on the face of the check. This settlement amount is in addition to any fees, taxes, or other fines that may be imposed on the Company by law.

14. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.A of this Consent Order, the Company is subject to a stipulated fine of up to \$5000.00 per violation. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.B of this Consent Order, the Company is subject to a stipulated fine of up to \$1000.00 per violation per day. On and after the effective date of this Consent Order, if the Company fails to comply with any other provision of this Consent Order except Paragraph 9 and 10, the Company is subject to a stipulated fine of up to \$500.00 per violation. The amount of the stipulated fines imposed pursuant to this paragraph shall be within the discretion of the MDEQ. Stipulated fines submitted under this Consent Order shall be by check, payable to the State of Michigan within thirty (30) days of written demand and shall be delivered to the Michigan Department of Environmental Quality, Financial and Business Services Division, Revenue Control, P.O. Box 30657, Lansing, Michigan 48909-8157. To ensure proper credit, all payments shall include the Agreement Identification No. AQD20025-S on the face of the check. Payment of stipulated fines shall not alter or modify in any way the Company's obligation to comply with the terms and conditions of this Consent Order.

15. The AQD, at its discretion, may seek stipulated fines or statutory fines for any violation of this Consent Order which is also a violation of any provision of applicable federal and state law, rule, regulation, permit, or MDEQ administrative order. However, the AQD is precluded from seeking both a stipulated fine under this Consent Order and a statutory fine for the same violation.

16. To ensure timely payment of the settlement amount assessed in paragraph 13 and any stipulated fines assessed pursuant to paragraph 14 of this Consent Order, the Company shall pay an interest penalty to the State of Michigan each time it fails to make a complete or timely payment under this Consent Order. The interest payment shall be determined at a rate of interest that is equal to one percent (1%) plus the average interest rate paid at auctions of 5-year United States treasury notes during the six months immediately preceding July 1 and January 1, as certified by the state treasurer, compounded annually, and using the full increment of amount due as principal, calculated from the due date specified in this Consent Order until the date that delinquent payment is finally paid in full. Payment of an interest penalty by the Company shall be made to the State of Michigan in accordance with

paragraph 14 of this Consent Order. Interest payments shall be applied first towards the most overdue amount or outstanding interest penalty owed by the Company before any remaining balance is applied to subsequent payment amount or interest penalty.

17. The Company agrees not to contest the legal basis for the settlement amount assessed pursuant to paragraph 13. The Company also agrees not to contest the legal basis for any stipulated fines assessed pursuant to paragraph 14 of this Consent Order, but reserves the right to dispute in a court of competent jurisdiction the factual basis upon which a demand by MDEQ of stipulated fines is made. In addition, the Company agrees that said fines have not been assessed by the MDEQ pursuant to Section 5529 of Part 55 and therefore are not reviewable under Section 5529 of Part 55.

18. This compliance program is not a variance subject to the 12 month limitation specified in Section 5538 of Part 55.

19. This Consent Order shall remain in full force and effect for a period of at least two (2) years. Thereafter, the Consent Order shall terminate only upon written notice of termination issued by the AQD Chief. Prior to issuance of a written notice of termination, the Company shall submit a request, to the AQD Chief at the Michigan Department of Environmental Quality, Air Quality Division, P.O. Box 30260, Lansing, Michigan 48909-7760, consisting of a written certification that the Company has fully complied with all the requirements of this Consent Order and has made all payments including all stipulated fines required by this Consent Order. Specifically, this certification shall include: (i) the date of compliance with each provision of the compliance program and the date any payments or stipulated fines were paid; (ii) a statement that all required information has been reported to the AQD Detroit District Supervisor; (iii) confirmation that all records required to be maintained pursuant to this Consent Order are being maintained at the facilities; and, (iv) such information as may be requested by the AQD Chief.

20. In the event Chrysler Group LLC sells or transfers the Facility, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within thirty (30) calendar days, the Company shall also notify the AQD Detroit District Supervisor, in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser and/or transferee. As a condition of the sale, Chrysler Group LLC must obtain the consent of the purchaser and/or transferee, in writing, to assume all of the

obligations of this Consent Order. A copy of that agreement shall be forwarded to the AQD Detroit Office within thirty (30) days of assuming the obligations of this Consent Order.

21. Prior to the effective date of this Consent Order and pursuant to the requirements of Sections 5511 and 5528(3) of Part 55, the public was notified of a 30-day public comment period and was provided the opportunity for a public hearing.

22. Section 5530 of Part 55 may serve as a source of authority but not a limitation under which the Consent Order may be enforced. Further, Part 17 of Act 451 and all other applicable laws and any other legal basis or applicable statute may be used to enforce this Consent Order.

23. The Company hereby stipulates that entry of this Consent Order is a result of an action by MDEQ to resolve alleged violations at 2101 Connor Avenue in Detroit. The Company further stipulates that it will take all lawful actions necessary to fully comply with this Consent Order, even if the Company files for bankruptcy in the future. The Company will not seek discharge of the settlement amount and any stipulated fines imposed hereunder in any future bankruptcy proceedings, and the Company will take necessary steps to ensure that the settlement amount and any future stipulated fines are not discharged. The Company, during and after any future bankruptcy proceedings, will ensure that the settlement amount and any future stipulated fines remain an obligation to be paid in full by the Company to the extent allowed by applicable bankruptcy law.

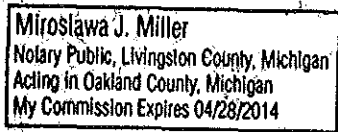
The undersigned certifies that he/she is fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

**CHRYSLER GROUP, LLC**

JASON RYSKA PLANT MANAGER  
Print Name and Title

Jason Ryska Date: 11/11/13  
Signature

The above signatory subscribed and sworn to before me this 11th day of November, 2013.



Mirosława J. Miller  
Notary Public

Approved as to Content:

Approved as to Form:

G. Vinson Hellwig  
G. Vinson Hellwig, Chief  
AIR QUALITY DIVISION  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

Neil Gordon  
Neil Gordon, Section Head  
ENVIRONMENTAL REGULATION SECTION  
ENVIRONMENT, NATURAL RESOURCES,  
AND AGRICULTURE DIVISION  
DEPARTMENT OF ATTORNEY GENERAL

Dated: 11/21/13

Dated: 11/19/2013

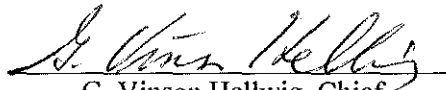


FINAL ORDER

The Chief of the Air Quality Division having had opportunity to review the Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Environmental Quality pursuant to the provisions of Part 55 of Act 451 and otherwise being fully advised on the premises,

HAS HEREBY ORDERED that the Consent Order is approved and shall be entered in the record of the MDEQ as a Final Order.

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

  
G. Vinson Hellwig, Chief  
Air Quality Division

Effective Date: 11/21/13

AQD No. 22-2013

EXHIBIT A

Quality Improvement Plan

Chrysler Group LLC  
Jefferson North Assembly Plant

Quality Improvement Plan  
August 2013

This Quality Improvement Plan ("QIP") has been developed in accordance with the Violation Notice issued to the Chrysler Group LLC Jefferson North Assembly Plant ("JNAP") on January 17, 2013, by the Michigan Department of Environmental Quality, and as part of the resolution to the Enforcement Notice of February 5, 2013. This QIP addresses the practices and procedures to be implemented by JNAP to address and respond to the thermal oxidizer temperature excursions that were identified for five oxidizers ("Temperature Excursions").

### **Introduction**

This QIP identifies and addresses each of the requirements of 40 CFR § 64.8, as they relate to the Temperature Excursions. Two causes of the Temperature Excursions were identified: (1) plant personnel misunderstood new permit conditions related to the thermal oxidizers, and (2) the thermal oxidizers at issue had been set at the temperature that confirmed compliance during the most recent compliance demonstration tests in 2009, 2010 and 2011. These set points, while demonstrating compliance, were too low to consistently maintain a 3-hr average above the corresponding permit limits. Implementation of the QIP is intended to prevent the recurrence of these factors and to institute a consistent compliance status review process.

A copy of the rule, 40 CFR § 64.8, is included in the Appendix.

### **Availability - § 64.8(b)(1)**

JNAP shall maintain this QIP at the facility, and have it available for inspection upon request.

### **Evaluate Control Performance Problems - § 64.8(b)(2)**

The five thermal oxidizers subject to this QIP provide air pollution control to the following sources:

E-coat A Oven, Ecoat B Oven, Topcoat 1 Booth, Topcoat 2 Booth and Topcoat 3 Booth (the "Oxidizers").

The following performance controls on these units were evaluated and appropriate modifications to the procedures were made, as follows:

- A. The Oxidizers controlling these sources were evaluated and deemed to be functioning properly. The Temperature Excursions were not the result of performance problems with the devices.

The applicable permit temperature limitation for the subject devices may change due to subsequent permit modification or oxidizer compliance testing.

#### E. Temperature Excursion Response Procedure

In the event the combustion chamber temperature of an Oxidizer drops below the minimum operating temperature during production, the conveyor interlock is engaged, stopping the conveyor for the corresponding production line(s) and the introduction of additional vehicle bodies to the corresponding system. Upon interlock engagement, a flashing indicator (or "alarm") appears on the Paint Center Control Room screen and the following notifications and actions occur:

- i. Upon receipt of the interlock alarm in the Paint Center Control Room, the control room operator is responsible for notifying the Senior Manager on shift, the Maintenance Supervisor and the Abednego Environmental Technician. The Abednego Environmental Technician is responsible for notifying the EHS personnel of the alarm status.
- ii. JNAP EHS personnel and Corporate EHS are responsible for determining if the interlock stoppage was triggered by a malfunction and whether such malfunction results in a reportable event (per MI R336.1912 and R336.213).
- iii. JNAP EHS personnel and Corporate EHS are responsible for determining the appropriate amount of control credit used in calculating emissions from the impacted source.
- iv. If a malfunction/excursion/exceedance has occurred that warrants reporting, JNAP EHS personnel will lead the performance of a root-cause-analysis, and the development of and implementation of corrective actions, as appropriate. Corrective actions will be reviewed with JNAP's Plant Manager, Paint Center Manager, EHS Lead, Environmental Specialists and others, as appropriate to the corrective action.
- v. Upon detecting that a temperature excursion has occurred (per ROP, FG-Controls, IX.1.a), JNAP will restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely

JEFFERSON NORTH ASSEMBLY PLANT  
QIP - APPENDIX

TITLE 40—Protection of Environment  
PART 64—COMPLIANCE ASSURANCE MONITORING

**§ 64.8 Quality improvement plan (QIP) requirements.**

**64.8(a)**

Based on the results of a determination made under § 64.7(d)(2), the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with § 64.6(c)(3), the part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

**64.8(b)**

Elements of a QIP:

**64.8(b)(1)**

The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

**64.8(b)(2)**

The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

**64.8(b)(2)(i)**

Improved preventive maintenance practices.

**64.8(b)(2)(ii)**

Process operation changes.

**64.8(b)(2)(iii)**

Appropriate improvements to control methods.

**64.8(b)(2)(iv)**

Other steps appropriate to correct control performance.

**64.8(b)(2)(v)**

AQD No. 22-2013

EXHIBIT B

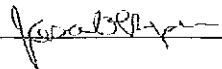
Supplemental Environmental Project (SEP)

## JNAP Supplemental Environmental Project

*In the Matter of Administrative Proceedings  
Against Chrysler Group LLC, Jefferson North Assembly Plant*

The proposed SEP is solely attributable to the settlement of the current, above referenced enforcement action and no funding has been budgeted to the project prior to the approval of the project, nor is the proposed project funded by grants, donations, low interest loans, or other sources of funding not attributable to JNAP's normal budgetary process. The proposed project is not being done, nor will receive credit, as part of an environmental incentive or awards program offered by local, state, or federal government or industry.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the statement above are true, accurate and complete.

  
\_\_\_\_\_

Jason Ryska, JNAP Plant Manager

7/24/13  
\_\_\_\_\_

Date

JNAP Supplemental Environmental Project

*In the Matter of Administrative Proceedings  
Against Chrysler Group LLC, Jefferson North Assembly Plant*

1. Name and Location:

Jefferson North Assembly Plant (JNAP)  
2101 Conner Avenue  
Detroit, Michigan 48215  
Wayne County

2. Regulatory Information:

This Supplemental Environmental Project (SEP) will be implemented in response to the Violation Notices issued to JNAP on October 4, 2012, January 17, 2013, and March 27, 2013 by the Michigan Department of Environmental Quality (MDEQ), and as part of the resolution to the Enforcement Notice of February 5, 2013, relating to JNAP Renewable Operating Permit number MI-ROP-N2155-2010, SRN: N2155

3. Project Name:

Air House Efficiency Improvement Project

4. Project Manager:

Zarko Mihajlovski  
JNAP Facilities Manager  
2101 Conner Ave.  
Detroit, MI 48215  
313-956-7603

Status report submission:

Dawn Breznai  
EHS Lead, JNAP  
2101 Conner Ave.  
Detroit, MI 48215  
313-363-7712

5. DEQ Contact:- Robert Byrnes

6. Geographical area to benefit: The City of Detroit and Wayne County

7. SEP Categories:



Pollution Prevention- energy efficiency  
Conservation- increased efficiency in the use of energy

8. Project Description

JNAP proposes to install two variable frequency drives (VFDs) on two (2) existing air house units (AHUs), along with building pressurization on temperature control logic to adjust the speed of the motors to properly deliver the correct amount of air flow to the plant floor. As part of this control modification we will be upgrading the programmable logic controller (PLC) that provides basic control of the AHUs to a Rockwell based control Logix (CLX) processor that will be connected via Ethernet to the existing plant building management system. Technology of VFDs and PLCs are consistent with previously completed AHU projects at this facility.

9. Expected Environmental Benefits

The purpose of installing VFDs controlled by an intelligent control algorithm is to adequately provide the optimal amount of air-flow to the plant floor to meet the customers' requirements and building pressurization standards. Previous similar projects have resulted in a 50% savings in electrical consumption with the proper control algorithm. It is anticipated that 116 metric tons of carbon dioxide gas per year will be directly reduced with the installation of this system, as well as the indirect reductions in various emissions associated with the generation of the electricity.

10. Anticipated Project Budget

The anticipated budget for the proposed project is approximately \$50,000.00.

- |                      |             |
|----------------------|-------------|
| a) PLC Upgrade(1)    | \$25,000.00 |
| b) VFDs for (2) AHUs | \$18,000.00 |
| c) Engineering       | \$7,000.00  |
- a. Installation work to be performed by Chrysler Group LLC
  - b. Programming to be performed by contractors
  - c. PLC upgrade equipment Rockwell, CLX processor
  - d. VFD upgrade equipment Rockwell 400 series drives
  - e. Life expectancy of 20 years for all purchased equipment

Additionally, the annual operating cost for this new equipment is anticipated to be about \$25,000. Savings to Chrysler is estimated to be \$25,000/year. The value of the SEP that is used in the Consent Order was estimated based on a 2 year operating period of the equipment.

11. Anticipated Project Time Line

- a) Six month timeline
- b) Month (1) Project approval
- c) Month(2) Order material, review design documents
- d) Month (3-4) Arrival of all material
- e) Month (5) Installation of PLCs and VFDs
- f) Month(6) Programming and debugging

12. Accounting: JNAP will account for all expenditures

13. Reporting:  
Project status reports will include accounting and installation status updates.

14. Regulatory Requirements: None

15. Certification of expenditures  
See attached Certification.