



Via Electronic and U.S. Mail

October 11, 2021

Dr. April Wendling
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202
wendlinga@michigan.gov

**RE: FCA US LLC (FCA) – Detroit Assembly Complex Mack, SRN: N2155
Response to Violation Notice**

Dear Dr. Wendling:

This letter responds to AQD's September 20, 2021 Violation Notice ("VN"), which alleged noncompliance with General Condition No. 6 of Permit to Install No 14-19a (an "unreasonable interference with the comfortable enjoyment of life and property") related to the presence of nuisance odors observed by Air Quality Division staff on three occasions in the area near the Detroit Assembly Complex Mack ("Mack") facility. As discussed below, FCA US LLC ("FCA") has initiated actions to identify and correct potential odor emissions related to the operation of the Mack facility.

In light of the size and complexity of the Mack facility, FCA is taking a two-pronged approach: 1) acting quickly to eliminate potential sources of objectionable odor that can be identified and eliminated immediately, and 2) gathering odor-related information and performing a comprehensive odor investigation at the facility that includes, in addition to our own internal investigation, engaging an outside, third-party engineering firm to provide their expert review. The results of the investigation will be used to develop a plan to implement odor control measures, as appropriate. A summary of the results of the investigation and plan will be provided to AQD and the community. Until the plan is in place, FCA will continue to seek out potential sources of objectionable odor as additional information is gathered, and will implement remedial measures as identified.

We take these odor concerns very seriously, and we are working expeditiously to identify and manage potential sources. We also recognize the importance of hearing about these concerns from the community as they arise. Therefore, we will set up a dedicated line for local community members to report odor concerns directly to us.

Background

FCA was first made aware that there was a concern in the community about potential odors from the Mack facility on September 7th during a site visit by the AQD inspector. When FCA was alerted to the potential odors, we immediately initiated a review to identify any operations that could be a cause of odors. Potential odor causing operations, migration pathways and conditions, dispersion, and even how receptors respond to odors, is an extremely complex phenomenon which is impacted by numerous variables that can make identification and appropriate corrective actions challenging. Therefore, while FCA works to quickly investigate and remediate potential odor sources, we have engaged a third-party engineering firm with odor investigation expertise to support our efforts.

It is important to note that the emission control systems at the facility are operating properly and in compliance with the air permit conditions. In addition, FCA is committed to ensuring our operations are not only compliant with the numeric limits imposed by the permit but also do not unreasonably interfere with the enjoyment of the neighborhood.

FCA's Investigation

In response to the notice of potential odor concerns from the facility, FCA initiated the following activities to investigate and attempt to identify any odor sources.

Response to Specific Complaints

FCA has initiated an odor complaint review process where each complaint is logged, and the conditions that existed at the time of the complaint are recorded and evaluated. These conditions include the atmospheric conditions such as wind direction, wind speed, and temperature (taken from the FCA on-site weather station), the production activity at the time of the complaint, and any non-production operations which might have been ongoing at that time.

Additionally, when a notice of a complaint is received in a timely manner, FCA personnel conduct an evaluation of odors off-site. This investigation is intended to aid the company in identifying potential sources of odor.

Routine Odor Monitoring Program

FCA has initiated a routine odor monitoring program in an attempt to determine trends and sources of potential odors from plant operations. This odor monitoring program includes observations along the edge of the Mack property. Observations are made several times a day. The atmospheric conditions and operations of the facility are noted and recorded during each monitoring event.

Investigation of Potential Sources

Following being notified of the potential odor concerns, FCA initiated an investigation of the overall operation at the Mack. This investigation is ongoing, and we are taking

certain presumptive actions to address potential odor causing conditions (as discussed below).

FCA has retained the services of an expert engineering firm to conduct a thorough evaluation of potential odor sources from the Mack Paint Shop, including exhaust stacks and building ventilation systems. Until the study is complete, FCA continues to perform its own internal analysis to identify and will remediate potential sources of odor.

FCA Response Actions

In addition to the investigative actions noted above, FCA has also taken presumptive actions to immediately reduce the risk of odors from plant operations, as described below.

- Based on reported odors west of the plant, often when winds are out of the east, FCA has initiated a procedure which requires any large access doors along the west side of the building to be closed at all times when they are not in use.
- Automatic exterior roll-up doors have been ordered. This will ensure that the doors are closed when not in use.
- Tarps have been installed on the de-watering boxes located in the paint sludge room to help minimize odors.
- An automated chemical feeding system is in the process of being installed on the paint sludge system to ensure optimized management of the process which will help to reduce odors from the paint sludge process.
- Contracted vendor (subject matter experts) dedicated to assume operation of the paint sludge system.
- FCA is monitoring the painting process equipment very closely to identify any operating conditions which might cause odors to escape into the general building atmosphere and potentially be discharged through the building ventilation system.
- Installing automated booth balancing system to continually optimize the booth operation.
- Paint booth pressure monitoring system installed to notify operators if the booth balance is approaching a non-optimal condition.

Conclusions

FCA is committed to addressing any objectionable odors from the Mack facility operations. FCA's monitoring program will continue as necessary to identify and control any sources of objectionable odors. While the investigation work may take some time to complete due to the complexities of the operation, we anticipate having the odor investigation, modeling (if necessary), and plan for any odor control measures, if required, completed within 90 days (January 9, 2022). At that time, we will share the results of our investigation and plan with AQD and the community. In the meantime, FCA commits to continuing the efforts described above to identify and address potential sources of objectionable odor.

Please feel free to contact Rebecca Payne at rebecca.payne@stellantis.com if you should have any questions.

Sincerely,



Michael Brieda
Plant Manager
FCA US LLC, Detroit Assembly Complex Mack

C: Mr. Bob Byrnes, AQD (byrnesr@michigan.gov)
Ms. Rebecca Payne, Mack Environmental Specialist
Mr. Garrett Stricker, EHS Assembly Division Lead
Mr. Al Johnston, FCA Corporate EHS
Mr. Matt Read, FCA OGC
Ms. Jenine Camilleri, AQD (camillerij@michigan.gov)