Via Electronic and U.S. Mail

November 23, 2021

Mr. Robert Byrnes
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202
byrnesr@michigan.gov

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

Dear Mr. Byrnes:

This letter responds to AQD's November 2, 2021 follow-up letter to FCA regarding the September 20, 2021 Violation Notice ("VN"). In the follow-up letter, AQD seeks additional information related to FCA's VN response. In particular, AQD requested information related to the Mack Assembly Community Hotline and the process associated with EUSPOTREPAIR.

FCA provides the following information in response to AQD's request:

- The Mack Assembly Community Hotline was launched on November 9th.
- At the time of launch, the Hotline was publicized on the Stellantis for Detroit website and distributed through a newsletter sent to local community members. The information about the number will also be highlighted in our upcoming quarterly newsletter and public meeting required under our Community Benefits Agreement with the City of Detroit.
- Callers to the hotline who are reporting odor complaints will be informed that the hotline is specifically for notifying Stellantis of odor issues, and that they should call the Michigan PEAS line if they wish to notify the State of Michigan.
- The process associated with EUSPOTREPAIR consists of two booths in parallel where minor blemishes are repaired manually. The repair process may include sanding and coating applications. The material used in these repair booths is consistent with those applied in the paint lines (i.e., same coatings). The amount

of material used on each repair will depend on the size of the blemish, and will vary per vehicle. During a recent site visit, AQD identified EUSPOTREPAIR as an area of potential concern. However, as a point of clarification, the solvent and aqueous based gun parts cleaners are located adjacent to and east of the spot repair area, and are vented to the general building air. These parts washers are kept closed except when in use.

- The exhaust from EUSPOTREPAIR is included in the third-party evaluation of emissions from exhaust stacks. The exhaust of general building air is also being evaluated at the vent locations.

EGLE also requested that FCA conduct "perimeter air monitoring around the facility to assist in evaluation of any potential public health concerns." FCA provided a proposed plan for this monitoring program to the AQD on November 16th (copy attached). We share AQD's desire to respond to the community's health questions by conducting such a sampling program. We anticipate the initiation of the program shortly after receiving AQD feedback on the plan.

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: Dr. April Wendling, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Jenine Camilleri, AQD (camillerij@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

DACM Perimeter Air VOC Monitoring Program

Volatile Organic Compounds (VOCs) Sampling Overview

Three consecutive 24-hour Volatile Organic Compounds (VOC) measurements will be taken along the western property line following US EPA Method TO-15 (using summa canisters). The stainless steel summa canister is an evacuated cylinder that will be equipped with a critical orifice or mass flow controller unit that allows ambient air to be directed to the summa canister at a known rate. Once the 24-hour duration of the sample is complete, the valve closes and the cylinder can be retrieved prior to the next sampling event.

The summa canister will be sent to an accredited laboratory for analysis for TO-15 compounds.

A specification sheet on the equipment and the list of VOCs provided by the laboratory for TO-15 is attached.

VOC Sampling Frequency

VOC sampling will be completed for three (3) consecutive 24-hour sampling events during periods when an easterly wind is forecasted for at least a portion of a 24-hour period. Sample duration will be approximately 24-hours and will operate from approximately midnight to midnight on the specific sampling periods.

VOC Siting Requirements and Sampling Locations

Each sampler inlet height will be 3 to 15 meters (10ft to 50 ft) above ground, in accordance with US EPA guidance. The collection systems will be outfitted with a “J” hook and rain shield as well as an in-line stainless steel sintered filter. The sampling will be completed over three (3) consecutive days, at three (3) locations along the western property line (within FCA property) and will be collected concurrently. Below is a representation of approximate locations of the VOC samplers.

VOC QA/QC

Operation, service and maintenance of the sampler will be completed in accordance with US EPA TO-15 and the instrument manufacturer's operation manual.

Additional Equipment Required

- Flow controller capable of maintaining a flow of 3.5 mL/min. over 24 hours
- Stainless steel vacuum gauge capable of measuring 0.05 mm Hg
- Inlet line (stainless steel tubing ¼″ inside diameter [I.D.] or 1/8″ ID)
- Sintered stainless steel in-line filter (2 µm pore size)

Internal Performance Checks

Internal checks will be completed manually during every sample collection. These checks are required to assess sampler performance such as proper flow controller operation. The checks include visual observation of the sampler to ensure that it is not damaged (valve opens/closes properly), that the vacuum gauge is functional and that the flow controller is properly installed on top of the canister valve. The sampling system will be leak checked prior to sample initiation. Initial vacuum should be approximately −29 inches of Hg and the final vacuum should be between −3 to −10 inches of Hg.

External Performance checks and Calibrations

An external performance check and calibration of the vacuum gauge and flow controller will be completed twice per year. The calibration will be completed in accordance with the procedures described in the US EPA reference documents. The results of the external performance check and calibration will be recorded and documented. Only calibration equipment that has been properly certified will be used. In addition, a duplicate sample will be collected at one (1) of the locations to validate measurements as well as a zero-air sample will be collected.

ALS Waterloo Routine TO-15 Canister Scan VOC RLs

Parameter	Synonym	LOR SCAN	
		Units	Units
		ppb(v)	µg/m^3
ACETONE	2-propanone	0.5	1.19
ALLYL CHLORIDE	3-chloropropene	0.2	0.63
BENZENE	benzene	0.2	0.64
BENZYL CHLORIDE	chloromethylbenzene	0.2	1
BROMODICHLOROMETHANE	Bromodichloromethane	0.2	1.3
BROMOFORM	tribromomethane	0.2	2.1
BROMOMETHANE	Bromomethane	0.2	0.78
1,3-BUTADIENE	1,3-Butadiene	0.2	0.44
CARBON DISULFIDE	Carbon Disulfide	0.2	0.62
CARBON TETRACHLORIDE	tetrachloromethane	0.2	1.3
CHLOROBENZENE	Chlorobenzene	0.2	0.92
CHLORODIBROMOMETHANE	Dibromochloromethane	0.2	1.7
CHLOROETHANE	ethyl chloride	0.2	0.53
CHLOROFORM	trichloromethane	0.2	0.98
CHLOROMETHANE	methyl chloride	0.2	0.41
CYCLOHEXANE	Cyclohexane	0.2	0.69
1,2-DIBROMOETHANE	ethylene dibromide	0.2	1.5
1,2-DICHLOROBENZENE	1,2-Dichlorobenzene	0.2	1.2
1,3-DICHLOROBENZENE	1,3-Dichlorobenzene	0.2	1.2
1,4-DICHLOROBENZENE	1,4-Dichlorobenzene	0.2	1.2
DICHLORODIFLUOROMETHANE	Freon 12	0.2	0.99
1,1-DICHLOROETHANE	1,1-Dichloroethane	0.2	0.81
1,2-DICHLOROETHANE	1,2-Dichloroethane	0.2	0.81
1,1-DICHLOROETHENE	1,1-Dichloroethene	0.2	0.79
CIS-1,2-DICHLOROETHENE	cis-1,2-Dichloroethylene	0.2	0.79
TRANS-1,2-DICHLOROETHENE	trans-1,2-Dichloroethylene	0.2	0.79
DICHLOROMETHNE	methylene chloride	0.2	0.69
1,2-DICHLOROPROPANE	propylene dichloride	0.2	0.92
CIS-1,3-DICHLOROPROPENE	cis-1,3-Dichloropropene	0.2	0.91
TRANS-1,3-DICHLOROPROPENE	trans-1,3-Dichloropropene	0.2	0.91
1,4-DIOXANE	1,4-Dioxane	0.2	0.72
ETHYL ACETATE	Ethyl acetate	0.2	0.72
ETHYLBENZENE	Ethyl benzene	0.2	0.87
4-ETHYLTOLUENE	1-ethyl-4-methylbenzene	0.2	0.98
HEPTANE	n-Heptane	0.2	0.82
HEXACHLOROBUTADIENE	Hexachlorobutadiene	0.2	2.1
HEXANE	n-Hexane	0.2	0.7
2-HEXANONE	methyl butyl ketone	1	4.1
ISOOCTANE	2,2,4-trimethylpentane	0.2	0.93
ISOPROPYL ALCOHOL	2-propanol / isopropanol	1	2.46
METHYL ETHYL KETONE	2-butanone	0.2	0.59
METHYL ISOBUTYL KETONE	4-methyl-2-pentanone	0.2	0.82
METHYL-TERT-BUTYL ETHER	MTBE	0.2	0.72
PROPYLENE	propene	0.2	0.34
STYRENE	Styrene	0.2	0.85
1,1,2,2-TETRACHLOROETHANE	1,1,2,2-Tetrachloroethane	0.2	1.4
TETRACHLOROETHENE	perchloroethylene	0.2	1.4
TETRAHYDROFURAN	1,4-epoxybutane	0.2	0.59
TOLUENE	Toluene	0.2	0.75
1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE	Freon 113	0.2	1.5
1,2,4-TRICHLOROBENZENE	1,2,4-Trichlorobenzene	0.2	1.5
1,1,1-TRICHLOROETHANE	1,1,1-Trichloroethane	0.2	1.1
1,1,2-TRICHLOROETHANE	1,1,2-Trichloroethane	0.2	1.1
TRICHLOROETHENE	Trichloroethylene	0.2	1.1
TRICHLOROFLUOROMETHANE	Freon 11	0.2	1.1
1,1,2,2-TETRAFLUORO-1,2,-DICHLOROETHANE	Freon 114	0.2	1.4
1,2,4-TRIMETHYLBENZENE	1,2,4-Trimethylbenzene	0.2	0.98
1,3,5-TRIMETHYLBENZENE	1,3,5-Trimethylbenzene	0.2	0.98
VINYL ACETATE	Vinyl acetate	0.5	1.8
VINYL BROMIDE	Vinyl bromide	0.2	0.87
VINYL CHLORIDE	Vinyl chloride	0.2	0.51
ORTHO-XYLENE	o-Xylene	0.2	0.87
M+P-XYLENES	m&p-Xylene	0.4	1.7
4-BROMOFLUOROBENZENE (surrogate)	4-Bromofluorobenzene	1	n/a