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APR 26 2022

Air Quality Division
Detroit Office

April 14, 2022

Dr. April Wendling
Michigan EGLE-Air Quality Division
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202

**RE: FCA US LLC (FCA) – Detroit Assembly Complex Mack (“Mack”), SRN: N2155
Response to Violation Notice – March 24, 2022**

Dear Dr. Wendling:

This letter responds to Michigan Department of Environment, Great Lakes and Energy (EGLE) Air Quality Division’s (AQD’s) March 24, 2022 Violation Notice (“VN”), which alleged an “unreasonable interference with the comfortable enjoyment of life and property” based on odors of “moderate intensity” near the Mack facility on March 22, 2022. As you know, FCA has already initiated actions to identify and address potential nuisance odors related to the operation of the Mack facility.

In response to odor concerns previously discussed with AQD, FCA undertook an investigation that identified key odor identification and reduction opportunities at the Mack facility. As a result, FCA has several measures in place to identify and address odor concerns, including receiving and responding to public comments via the community hotline (833-310-2313), continued assessment of potential odor sources, the implementation of operational changes to minimize odor transport (such as closed access doors during operations), and active management of the process equipment in the Mack facility.

FCA also identified several key measures to address the potential odor sources of greatest concern. For example, FCA routed previously unabated emissions from the primer ambient flash zone to the existing regenerative thermal oxidizer (“RTO”). In addition, FCA is piloting and implementing odor control technologies. Through the use of these odor control technologies, FCA has reduced the potential for nuisance odors in most circumstances.

FCA also plans to undertake additional construction activities. Specifically, FCA will construct and operate a second RTO (“RTO2”) that will limit odors attributable to the Clearcoat flash and observation zones. FCA can address these zones with the odor control technologies, but the implementation of RTO2 will better address their potential nuisance odors. FCA will also re-route the concentrator exhaust to a new stack. As you know, FCA and AQD continue to discuss the accelerated implementation of these construction activities. In the interim, FCA will focus on implementing the odor control technologies to minimize the risk of nuisance odors.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Brieda', written in a cursive style.

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

CC: Mr. Bob Byrnes, AQD
Ms. Jenine Camilleri, AQD
Ms. Erin Moran, AQD
Ms. Rebecca Payne, Mack Environmental Specialist
Mr. Garrett Stricker, EHS Assembly Division Lead
Ms. Sandra Walker, FCA Corporate EHS
Mr. Al Johnston, FCA Corporate EHS
Mr. Greg Rose, FCA Corporate EHS
Mr. Matt Read, FCA OGC
Mr. Kurt Kissling, Warner Norcross + Judd LLP