



Via Electronic and U.S. Mail

June 10, 2022

Mr. Robert Byrnes
Michigan EGLE-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 ("Mack"), SRN: N2155
Response to Violation Notice — May 20, 2022**

Dear Mr. Byrnes:

This letter responds to Air Quality Division's (AQD's) May 20, 2022 Violation Notice ("VN") alleging nuisance "odors of moderate intensity" near the Mack facility on May 6, 2022. AQD reported "Level 3" odors on that day based on the scale of 1-5, with Level 3 representing the lowest odor threshold deemed to represent a violation of Rule 901. 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. Using 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 is currently addressing these zones with odor control technologies. The implementation of RTO2 will serve as the long-term action that will address the 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.

On May 6, as part of our ongoing pilot testing, water supply improvements to achieve consistent application were still being made to the CupriDyne Clean® odor neutralization technology. Although the pilot testing for both odor neutralization technologies remains ongoing, FCA believes that these water supply improvements will reduce the potential for future nuisance odors.

Please contact Paul Diven at paul.diven@stellantis.com if you have any questions.

Sincerely,



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

CC: Mr. Bob Byrnes, AQD
Ms. Jenine Camilleri, AQD
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Ms. Paul Diven, Mack Environmental Specialist
Mr. Garrett Stricker, EHS Assembly Division Lead
Ms. Sandra Walker, FCA Corporate EHS
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