

Proposed Project Summary

FCA US, LLC

The Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD), is asking for comments from the public on a proposed Permit to Install (PTI) for FCA US LLC (FCA) for the Warren Truck Assembly Plant (Warren Truck). The AQD will accept comments on the proposed PTI until the close of the public hearing on August 19, 2019. We will review all comments before we make a final decision on the proposal.

What is FCA proposing to do under the PTI application?

FCA is proposing to install a new automotive paint shop and make upgrades to the existing automotive assembly line at Warren Truck, located in the City of Warren in Macomb County.

If approved, a new building will be constructed for the new paint shop. The new paint shop would consist of the following processes: surface treatment, electrodeposition (E-coat) coating, the application of sealers, primers, and topcoat materials as well as other process steps including repair, solvent wiping and cleaning materials.

The existing body shop and final assembly operations would service vehicles from both the new and existing paint shops. The production capacity of Warren Truck is not anticipated to increase. Additionally, there would be various pieces of natural gas combustion equipment installed for the new paint shop. Including ovens, air supply houses, air make-up units, hot water generators, emergency engines, space heaters and a concentrator and regenerative thermal oxidizer (RTO). For the existing automotive assembly operations, new and replacement natural gas fired combustion equipment would be installed such as RTOs, hot water generators and air supply houses.

Also, certain coating operations would be removed from the existing automotive assembly line along with some of the existing natural gas combustion equipment.

What is a PTI and why is one needed?

A PTI, commonly known as an air use permit, is required for projects that involve installing, constructing, reconstructing, relocating, or modifying most processes

or process equipment that emit, or may emit, air contaminants, such as the proposed new paint shop and the changes to the existing automotive assembly line that FCA is proposing.

The AQD has reviewed the project and written proposed permit conditions including requirements to make sure the new paint shop and modified assembly line comply with all applicable air laws and regulations.

What is the current air quality in the area?

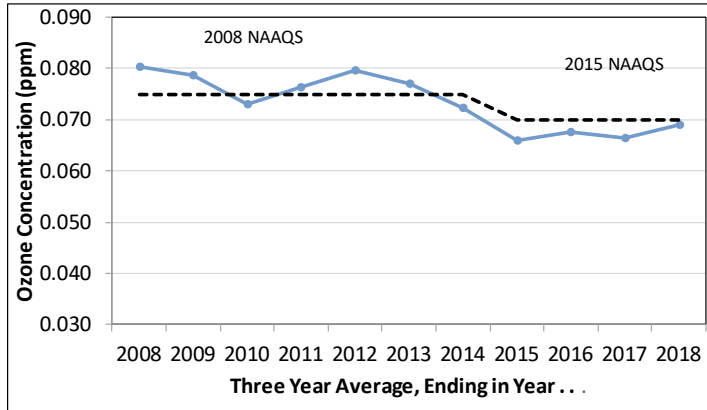
The United States Environmental Protection Agency (USEPA) has developed health-protective standards for specific air pollutants. These standards are called the National Ambient Air Quality Standards (NAAQS).

There are NAAQS for sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter equal to or less than 10 microns in diameter (PM₁₀), particulate matter equal to or less than 2.5 microns in diameter (PM_{2.5}), ozone, and lead.

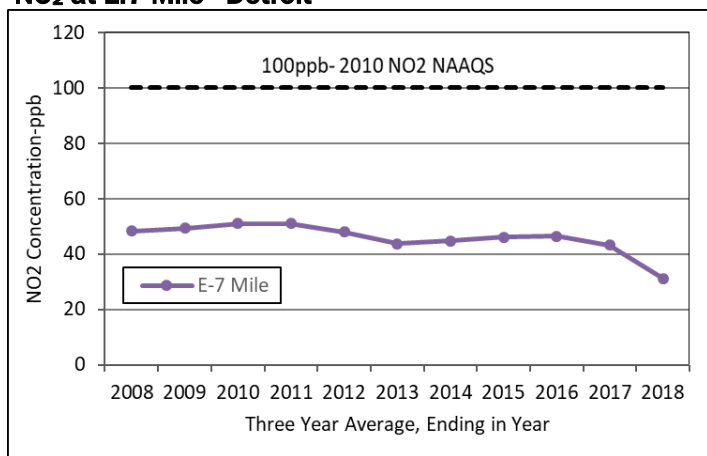
Each respective NAAQS is developed from research studies and set at a concentration in the air that would protect the health of the general public. The general public includes sensitive groups like those with heart, respiratory, and neurological problems.

The AQD has an air monitor in Warren that measures ozone. Macomb county is meeting all the NAAQS based on modeling and emissions data, except for ozone. The USEPA designated a seven county area in SE Michigan as nonattainment with the 0.070 parts per million (ppm) or 70 parts per billion (ppb) ozone standards. The AQD is working on plans to bring the area into attainment with the standard.

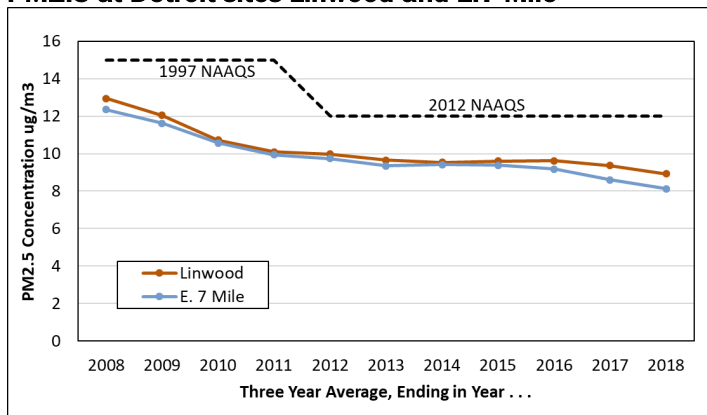
Three year average of the 4th high ozone concentration at Warren.



NO₂ at E.7 Mile - Detroit



PM_{2.5} at Detroit sites Linwood and E.7 Mile



Will the facility meet air quality standards?

A computer model was used to look at the expected impacts of the proposed project's emissions on the air quality in the area surrounding Warren Truck. This type of computer model is called an air dispersion model and considers many factors. The model showed that the expected impacts of the emissions would be less than the applicable NAAQS for NO₂, PM₁₀, and PM_{2.5}.

Michigan has developed health-based levels for additional pollutants referred to as toxic air contaminants (TACs) under its Air Toxics rules. The proposed TAC emissions would comply with the AQD's health-based screening levels.

How can FCA request an increase in emissions in a nonattainment area?

The air pollution control rules for a nonattainment area are designed to allow new growth while still bringing the area back into attainment. One way to achieve this is through Nonattainment New Source Review (NNSR) permitting. A requirement of NNSR permitting is the need to provide emissions offsets. Offsets are federally enforceable reductions in actual emissions at a rate greater than the proposed increase in those emissions. NNSR permitting also requires a company to take restrictions that comply with the Lowest Achievable Emission Rate (LAER) for the nonattainment pollutant(s) or precursor(s).

In the permit application, FCA demonstrated the proposed project can meet the requirements of NNSR permitting, including offsetting the requested emissions increase. FCA will offset the requested emissions increase of volatile organic compounds (VOCs), a precursor for ozone, by taking enforceable reductions on existing equipment at the Warren Truck Assembly Plant. These reductions are included in the proposed permit conditions.

Where can I find more information?

There are two ways to find more information about the PTI application: The Technical Fact Sheet has additional details about the project and how it will meet the rules and regulations, and AQD staff can provide additional information upon request. Here are some examples of information you may find useful:

- A summary of the reviews completed by AQD staff.
- How the project will affect air quality and public health.
- A summary of what the proposed permit would require FCA to do.
- A summary of the allowed emissions that are included in the proposed permit.
- The rules and regulations that apply to the project.
- Example emission calculations.

Summary:

The AQD has reviewed the PTI application and prepared a proposed permit. If approved, it will ensure the facility meets the applicable air quality requirements. Therefore, we are recommending approval of the permit.

However, before the AQD acts on the proposed permit, we are requesting comments from the public. The AQD will review all comments received during the public comment period and public hearing, then decide whether to approve or deny the proposed permit. If approved, the AQD may decide to add or change permit conditions based on the comments received.

What if I would like to make a comment?

The AQD welcomes comments from the public during the comment period. Prior to making a comment, it is a good idea to “View an Example” of how to do it. You may also want to read the “[Public Hearings - What you should know](#)” card. These documents can be found at <http://www.deq.state.mi.us/aps/cwerp.shtml>.

Who can I contact?

For more information about the proposed permit, please contact Mr. David Thompson, AQD, at: Thompsond22@michigan.gov or 517-284-6787.

Michigan's Environmental Justice Policy promotes the fair, non-discriminatory treatment and meaningful involvement of Michigan's residents regarding the development, implementation, and enforcement of environmental laws, regulations, and policies by this state. Fair, non-discriminatory treatment intends that no group of people, including racial, ethnic, or low-income populations, will bear a disproportionately greater burden resulting from environmental laws, regulations, policies, and decision-making. Meaningful involvement of residents ensures an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health.