



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

LANSING



LIESL EICHLER CLARK
DIRECTOR

January 24, 2020

VIA EMAIL AND U.S. MAIL

Mr. Greg Rose
FCA US, LLC
CIMS 482-00-51
800 Chrysler Drive
Auburn Hills, Michigan 48326

Dear Mr. Rose:

This letter is in reference to your Permit to Install (PTI), identified as No. 14-19, for a new auto assembly plant located at 11570 Warren Avenue East, Detroit, Michigan (State Registration Number M4085), and the proposed plans required in that PTI.

The Air Quality Division (AQD) reviewed both your proposed "Additional Projects Plan" (projects plan) and "Ambient Air Quality Monitoring Program Work Plan: Mack Avenue Assembly Plant" (monitoring plan). Following are the AQD's comments on both plans.

The AQD has determined the projects plan is lacking. The plan falls short of expectations, and additional clarification and information is needed. Please provide the following to supplement the proposed projects plan:

- Additional information regarding past community meetings and a proposed schedule to conduct future regular meetings to keep the community updated and to answer questions regarding the FCA Mack Avenue Assembly Plant, as referenced in your November 27, 2019, letter to United States Representative Rashida Tlaib.
- A detailed discussion listing who FCA met with to develop the proposed projects plan and how the proposal incorporates the needs and feedback from these individuals and groups, as well as an explanation of how comments from the public were and are being addressed.
- Specific details regarding the tree planting project, including a schedule and any planned outreach.
- A discussion of public health education as well as an expanded discussion regarding environmental education.
- Other projects are highlighted such as bus stops, rain barrels, and education projects, yet the Plan lacks specificity about these items. Please provide additional information regarding each of these items with the understanding there may be additional approvals required.
- A detailed explanation of why air filtration was not proposed and a discussion of the potential for a pilot project at one local building.

The FCA monitoring plan, dated November 15, 2019, addresses FCA's proposed ambient air monitoring around the Mack Avenue Assembly Plant pursuant to PTI No. 14-19. The monitoring plan describes a strategy of monitoring for ozone, fine particulate matter (PM_{2.5}), and meteorological parameters at a single location for a limited amount of time each calendar quarter. The monitoring plan, as submitted, is not acceptable. Please provide responses to the following comments to supplement the proposed monitoring plan:

- The AQD's Air Monitoring Unit (AMU) does not approve the proposed sampling frequency of two weeks in each calendar quarter. This will not provide sufficient data to characterize the air quality. Sampling should be continuous, or follow the one- to three-day sample schedule as published by the United States Environmental Protection Agency (USEPA).
- The AMU recommends a minimum of two pollutant measurement sites that represent an upwind and downwind location. Meteorological measurements can be made at a single site.
- The plan includes monitoring for ozone. It is unclear that this parameter is needed or useful at this site.
- If ozone is monitored, FCA must use either a Federal Reference Method (FRM) or Federal Equivalent Method (FEM). The proposed instrument does not appear to be either an FRM or FEM for ozone.
- The Tisch TE-Wilbur monitor for PM_{2.5} must be the VSCC (very sharp cut cyclone) model with USEPA designation FRPS-1014-219, method code 519.
- Due to filter costs, FCA may wish to consider a continuous real-time monitor for PM_{2.5} which meets the FRM or FEM requirements.
- The PM_{2.5} sampling must meet the requirements of 40 CFR Part 50, Appendix L.
- All pollutant monitoring, including PM_{2.5}, must meet the quality assurance requirements of 40 CFR Part 58, Appendix A.
- Evaluate the inclusion of volatile organic compound (VOC) air sampling around the facility following USEPA-approved methodology. Air sampling using summa canisters is the AQD's recommended methodology to conduct this type of sampling.

Additionally, please note the Michigan Department of Environment, Great Lakes, and Energy (EGLE) was provided a petition that included six requests from the citizens surrounding the facility. These requests include the following: donating money to a public health fund, air filtration systems and air quality monitoring at locations with vulnerable populations, vegetative buffers/traffic mitigation, truck routing, and regular community meetings. If the current proposed plan does not already address these requests, please evaluate and provide further clarification and information in the supplement to the "Additional Projects Plan."

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If you have any questions regarding this response, please contact Ms. Annette Switzer, Manager, Permit Section, AQD, at 517-284-6803; SwitzerA2@Michigan.gov, or EGLE, P.O. Box 30260, Lansing, Michigan 48909-7760; or you may contact me.

Sincerely,



Mary Ann Dolehanty, Director
Air Quality Division
517-284-6773

cc: United States Representative Rashida Tlaib
Senator Stephanie Chang
Ms. Liesl Eichler Clark, Director, EGLE
Mr. Aaron B. Keatley, Chief Deputy Director, EGLE
Mr. James Clift, Deputy Director, EGLE
Ms. Regina Strong, Environmental Justice Public Advocate, EGLE
Mr. Nick Assendelft, Public Information Officer, EGLE
Ms. Sarah M. Howes, Legislative Liaison, EGLE
Ms. Annette Switzer, EGLE
Mr. Jeffrey Korniski, EGLE