



THE SENATE  
STATE OF MICHIGAN

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Chris Etheridge  
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*Via electronic mail at [EGLE-AQD-PTIPublicComments@michigan.gov](mailto:EGLE-AQD-PTIPublicComments@michigan.gov)*

Dear Mr. Etheridge,

Thank you for the opportunity to submit public comment regarding the proposed Stellantis air quality permit (APP-2022-0125, to modify its Permit to Install 14-19A).

Residents living in the vicinity of the Stellantis Mack Assembly Plant have endured several years of health problems, ongoing air quality violations at the facility, a consent order process, and more. Many East Side residents have asthma. Others have experienced headaches, nausea and/or respiratory problems. It is important that our state government prioritize the consideration of public health with regard to permitting.

While I understand the importance of a functioning second regenerative thermal oxidizer (RTO2) to mitigate the odor problems that residents have experienced from the paint shop and that led to the recent consent order, it is very troubling that this new air quality permit includes an overall increase in PM2.5 and PM10 emissions from the Stellantis facility. Residents have been put in a quandary, an unfair position, where it seems the choice is either odor problems or particulate matter problems. They deserve to have neither problem.

I urge EGLE to use its expertise, authority and precedent from the Marathon Oil Refinery sulfur dioxide permit issue in 2016 to force the company to develop a strategy to lower PM2.5 emissions elsewhere at its Detroit facility. A reduction in emissions elsewhere in the plant could then balance with the increase from the RTO and result in a net zero impact on particulate matter emissions. In 2016, then-Department of Environmental Quality worked with Marathon to change its initial proposal for an increase of 22 tons of sulfur dioxide each year to voluntary measures leading to reductions of sulfur dioxide by a ton each year, sulfuric acid mist emissions by 0.5 ton per year, and nitrogen oxide emissions by 6.6 tons per year. Then-DEQ Director Creagh said, "This is a great example of industry, state officials and local officials working together for a solution that will benefit Detroiters and all Michiganders." This department found a way to identify voluntary measures from Marathon on sulfur

dioxide 8 years ago and can find a way to identify measures from Stellantis to address particulate matter now.

Particulate matter emissions can have detrimental impacts on the health of those living close to the facility, including cardiopulmonary problems and premature mortality. The permit shows that the predicted impact for PM2.5, 8.84 micrograms per cubic meter, will be very close to the NAAQS annual limit (98.2%). While technically allowable, this increase should be rejected.

The American Lung Association issued its “State of the Air Report” in Spring 2024 that gave Wayne County an F grade with regard to air quality. Detroit-Warren-Ann Arbor was ranked #13 for worst year round particle pollution. The U.S. Environmental Protection Agency, which recently lowered the NAAQS standard for PM2.5 to 9.0 micrograms per cubic meter, projects that the Metro Detroit area will be out of compliance with the standard by 2032. Within this context, it is clear that any increase in particulate matter emissions in our region should be unacceptable to our state government.

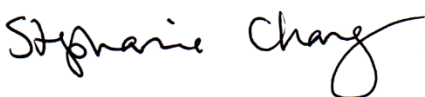
Residents in the community have repeatedly stated their desire for a voluntary buyout program, home repair funds that more people are able to access, home and school air filtration systems, more vegetative buffers, and reduced truck traffic impacts. I encourage EGLE to use its power to move Stellantis toward stronger action on these important demands from the community.

I urge EGLE to force Stellantis to, in its efforts to reduce odor by operating the RTO, find ways to reduce PM2.5 emissions elsewhere at its Detroit facilities to lead to a net zero impact on particulate matter. EGLE should either reject the permit application or modify it significantly as needed to lead to the result that East Side residents deserve.

In addition, I am aware that in its Material Management Division, EGLE recently came to an agreement with the community surrounding U.S. Ecology that it will use MiEJScreen and solidify an environmental justice analysis with regard to decision-making for hazardous waste operating licensing. I encourage EGLE to standardize the use of this important tool and analysis across all of its divisions, including the Air Quality Division.

Thank you for your consideration. If you have any questions, please do not hesitate to contact me at (517) 373-7346 or [senschang@senate.michigan.gov](mailto:senschang@senate.michigan.gov).

Sincerely,

A handwritten signature in black ink that reads "Stephanie Chang". The signature is written in a cursive, flowing style.

Stephanie Chang  
State Senator, District 3

CC: Phil Roos, Director  
Regina Strong, Environmental Justice Public Advocate  
Sydney Hart, Legislative Liaison