

Proposed Project Summary

Louis Padnos Iron & Metal

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), is asking for comments from the public on a proposed Permit to Install (PTI) for Louis Padnos Iron & Metal (Padnos). The AQD will accept comments on the proposed PTI until the close of the comment period on November 23, 2020. We will review all comments before we make a final decision on the proposal.

What is Padnos proposing to do?

Padnos is proposing to install a new scrap metal shredder at 645 Lucy Road in Howell, Michigan (Figure 1). The shredder will process cars, appliances, and other metal-containing materials. The scrap metal shredder and associated equipment will break down and separate waste material from the product (recycled metals). Material not able to be recycled would be sent to a landfill. The proposed equipment has air emissions which require an air permit.

Figure 1. Location of proposed scrap metal shredder



- Ferrous Separation System
- Non-Ferrous Separation System

What is a scrap metal shredder and how does it work?

In the scrap metal shredder, metal-containing materials are broken down to smaller pieces. The shredded material then passes through a ferrous material (mostly iron) separation system to separate iron scrap from non-iron scrap using magnets. A non-ferrous separation system separates mixed and non-iron metals from non-metal materials (fluff). The metals are collected as product and the fluff is temporarily stored on site and then hauled by truck to a landfill.

How will Padnos prevent dust from getting offsite?

Padnos would be required to have a dust management plan to prevent dust from leaving the property. A dust management plan includes the use of a water injection system as well as:

- Water application, as needed
- To sweep and keep all paved roadways clear
- Load materials to minimize dust
- Maintain records of all actions taken

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 scrap metal recycling process Padnos is proposing to install.

The AQD has reviewed the application and written proposed permit conditions including requirements to ensure the project complies with all applicable air laws and regulations.

What equipment will be included in the proposed facility/project?

If constructed, the proposed facility will be capable of shredding scrap metal and consist of the following equipment:

- Scrap metal shredder

What is a water injection system?

A water injection system is an electronic device used to control particulate (dust) emissions. It works by applying water to the material at various locations within the shredder to keep the material wet and prevent dust from being released.

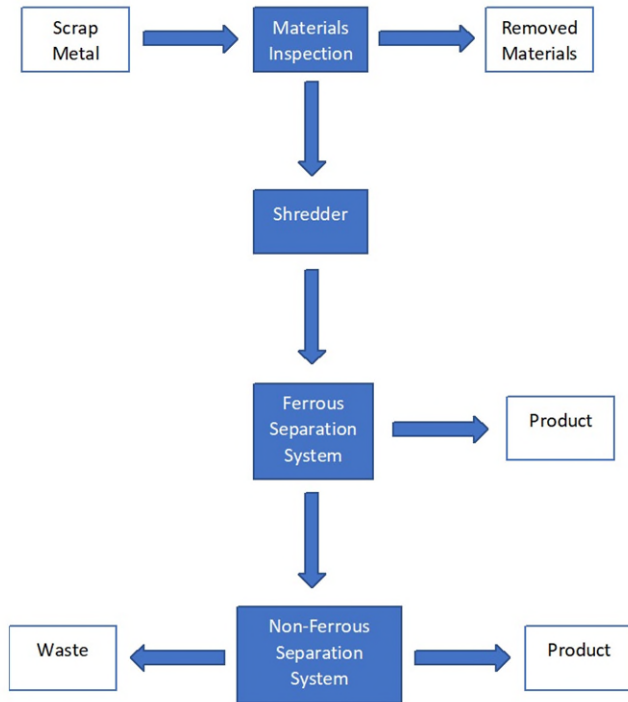
How will Padnos prevent fires and explosions?

Padnos would be required to inspect all incoming material and properly remove and dispose of all chemicals before shredding. Additionally, Padnos would have to flatten or puncture all gas tanks prior to shredding. Both

requirements greatly decrease the potential for explosions occurring within the shredder.

Padnos would also be required to apply water or other approved fire suppressant materials to ensure fires do not start in piles of fluff collected from the shredding process.

Process Flow Diagram



What is the current air quality in the area?

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

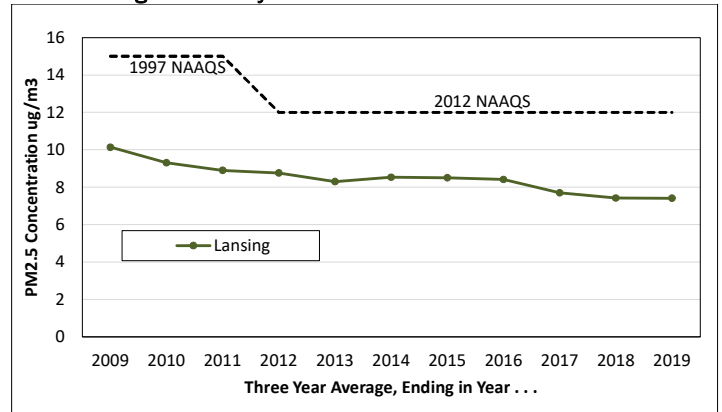
There are NAAQS for sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide, particulate matter equal to or less than 10 microns in diameter (PM₁₀), particulate matter equal to or less than 2.5 microns in diameter (PM_{2.5}), ozone, and lead.

NAAQS are developed from research studies and set at levels to protect public health. This includes health protection for sensitive groups like those with heart and lung problems.

The proposed facility is in Livingston County, Michigan which is currently meeting all of the NAAQS. The AQD does not operate air monitoring stations in Livingston County, however, the AQD does have a nearby monitoring station in Ingham County. The Ingham County station measures ozone, PM_{2.5}, NO₂, and SO₂. Figure 2 shows the trends for PM_{2.5}. Please note, the purpose of the air monitoring stations is to assess the regional or area-wide air quality

and is not used to determine if a specific source is in compliance with their air permit.

Figure 2. The annual average of PM_{2.5} concentrations at Lansing, Ingham County



Will the facility meet air quality standards?

A computer model determined the expected impacts of the proposed project’s emissions on the air quality in the area. The air dispersion model used considers many factors, such as quantity and type of emissions and prevailing wind direction.

The model showed the expected impacts of the emissions, plus the existing monitored levels are less than the applicable NAAQS for PM₁₀ and PM_{2.5}.

Additionally, the model showed the expected impacts from mercury deposition are not expected to result in adverse health effects.

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 from the project would also comply with the AQD’s health-based screening levels.

What about water or land concerns?

The AQD does not regulate water or land use; however, Padnos is required to have all applicable permits prior to construction of the facility. These other permits are required to ensure the proposed project complies with environmental regulations protecting land and water in the area.

What about noise, traffic, and zoning?

The AQD evaluates the potential air emissions from the proposed facility to determine if they comply with the air quality rules and regulations. The AQD does not have authority to regulate noise or traffic outside the facility and does not have authority to evaluate compliance with local zoning requirements. For more information about noise, traffic, and zoning, please contact Mr. Tim Schmitt,

City of Howell, Community Development Department, at: TSchmitt@cityofhowell.org or 517-546-3861.

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
- Effects on air quality and public health
- A summary of proposed permit requirements
- A summary of proposed allowed emissions
- Applicable rules and regulations
- Example emission calculations

Summary:

The AQD has reviewed the PTI application and prepared a proposed permit. If the proposed permit is approved, it will ensure the facility meets the applicable air quality requirements. Therefore, we recommend approving the proposed permit.

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

What public comments can EGLE consider?

Comments from the public are very important, but it is also important to know the law is clear about what we can and cannot consider when we make our decision. Some examples are below.

What we can consider	What we cannot consider
<ul style="list-style-type: none">• Technical mistakes in the review• Grammar and spelling mistakes• Other rules the action should consider and why• Why the action will not follow the rules	<ul style="list-style-type: none">• Air, land, or water issues not part of the project• Indoor air pollution• Traffic• Noise and lights• Zoning issues• Anything unrelated to the project

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.

How can I 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.



Via email

EGLE-AOD-PTIPublicComments@Michigan.gov



Via US mail

Ms. Annette Switzer, Permit Section Manager, EGLE, AQD, P.O. Box 30260, Lansing, MI 48909



Via voicemail

by calling 517-284-0900



At the Public Hearing on November 10, 2020

Who can I contact?

For information about the proposed permit, please contact Mr. Chuku Oje, AQD, at: OjeC@Michigan.gov or 517-582-5175.