

PROPOSED PROJECT SUMMARY

SMITHS CREEK LANDFILL – SMITHS CREEK, SAINT CLAIR COUNTY, MICHIGAN

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 Smiths Creek Landfill (Smiths Creek). The AQD will accept comments on the proposed PTI until the close of the comment period on November 26, 2024. We will review all comments before we make a final decision on the proposal.

WHAT IS SMITHS CREEK PROPOSING TO DO?

Smiths Creek is proposing to permit and operate an existing open flare with a proposed vacuum adsorption vessel (Figure 1). The adsorption vessel is a scrubber that will reduce hydrogen sulfide (H₂S) emissions. The purpose of the open flare and vacuum adsorption vessel is to provide additional gas and odor control to the south side of the existing landfill, which has recently experienced increased odor concerns.

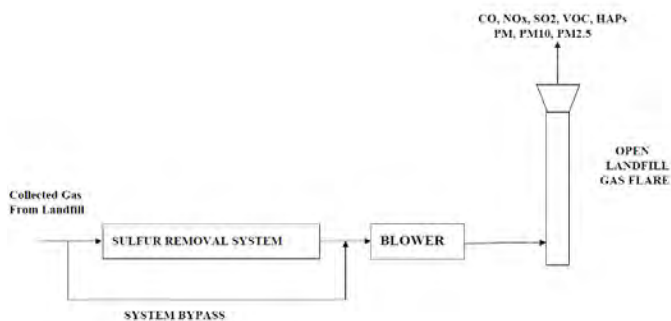


Figure 1: Process Flow Diagram

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 open flare at Smiths Creek.

The AQD has reviewed the application and written proposed permit conditions with requirements to make sure the project complies with all applicable air rules and regulations to protect public health.

WHY IS SMITHS CREEK GOING OUT TO PUBLIC COMMENT?

There has been past public interest in Smiths Creek Landfill. The law requires that permits with public interest be opened for public comment. This allows the public an opportunity to comment on the proposed permit conditions.

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 [some pollutants](#), including 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.

Poor air quality from high levels of pollution can cause health problems. The 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 facility is located in St. Clair County, Michigan which is currently meeting all of the NAAQS except for SO₂ (Figure 2).

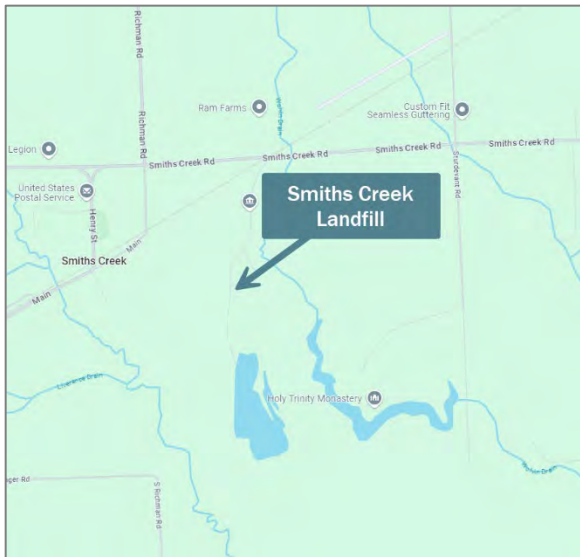


Figure 2 Location of Smiths Creek Landfill

The AQD operates two air monitoring stations in St. Clair County. The Port Huron station measures ozone, PM_{2.5}, and SO₂. The Port Huron-Rural Street station measures metals. 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 complies with their air permit.

WHAT DO I NEED TO KNOW ABOUT THE PROPOSED PERMIT?

The proposed permit has specific requirements Smiths Creek would have to follow if approved. Key areas you may be interested in, or that you may want more details on, include:

- **Emission limits** –The amount of specific air pollutants allowed to be released.
- **Material limits** - The maximum amount of landfill gas allowed to be burned in the flare.
- **Process restrictions** –The proposed hydrogen sulfide (H₂S) scrubber would be required to operate at all times and have a Preventative Maintenance/Malfunction Abatement Plan (PM/MAP) to ensure proper operation and maintenance.
- **Testing Requirements** –Testing to show emission limits, material limits, and either H₂S or total reduced sulfur concentrations are met.

- **Monitoring and Recordkeeping** –Must maintain appropriate records to show compliance with their permit.

WILL AIR QUALITY STANDARDS BE MET?

A computer model was used to determine the expected impacts of the emissions from the proposed project on the air quality in the area surrounding Smiths Creek. This type of computer model is called an air dispersion model. It considers many factors like the amount and type of emissions, wind directions, weather conditions, local geography, and other factors.

The model showed that expected impacts from the project do not exceed the allowed NAAQS for NO₂, SO₂, CO, PM₁₀, and PM_{2.5}.

Michigan has developed health-based screening levels for additional pollutants referred to as [toxic air containments](#) (TACs) under its Air Toxics rules. The proposed TAC emissions from the project would comply with these health-based screening levels.

ARE THERE SO₂ EMISSIONS FROM THE PROJECT?

SO₂ is released when burning landfill gas, like from the proposed flare. The SO₂ comes from the sulfur in the landfill gas. The amount of sulfur in the gas can be reduced by using a Vacuum Adsorption Vessel (H₂S scrubber). For this application, the proposed H₂S scrubber routes the landfill gas through physical media designed to remove sulfur from the landfill gas prior to being routed to the proposed flare.

WILL THE PROJECT IMPACT ODORS FROM THE LANDFILL?

The flare provides an additional vacuum for pulling landfill gas, reducing untreated gas from escaping and causing nearby odor issues. The odors from the captured landfill gas are reduced by being burned in the flare.

WAS ENVIRONMENTAL JUSTICE CONSIDERED FOR THIS PROJECT?

Part of opening a proposed permit for public comment involves evaluating the community around the proposed project including environmental justice, translation, and other community-specific concerns. Full details of how the AQD considers this in permitting can be found in “[Including Environmental Justice: Air Permitting in Michigan](#)”.

The language evaluation looks at the number of people who speak English “less than very well” within a 1-mile radius of the proposed project’s location. This is required by EGLE’s [Limited English Proficiency Plan](#) using an environmental justice screening tool like USEPA’s [EJSCREEN](#). The evaluation found that translation was not needed in the area around Smiths Creek.

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 the authority to regulate noise or traffic outside the facility and does not have authority to evaluate compliance with local zoning requirements.

WHERE CAN I FIND MORE INFORMATION?

Other information, like the [Technical Fact Sheet](#) and the [proposed permit conditions](#) can be found at Michigan.gov/EGLEAirPublicNotice, choose “Applications Open for Comment.” Smiths Creek Landfill’s application and important correspondence with the AQD can be found under PTI application No. APP-2024-0005 on the [Other Applications of Interest](#) page.

The Technical Fact Sheet has additional details about the project and how it will meet the rules and regulations, such as:

- 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 Smiths Creek Landfill to do.
- A summary of the allowed emissions included in the proposed permit.
- The rules and regulations that apply to the proposed project.

AQD staff can provide additional information upon request.

SUMMARY:

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

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

WHO CAN I CONTACT?

For more information about the proposed permit, please contact Vrajesh Patel, AQD, at: PatelV@Michigan.gov or 517-582-3909.

WHAT PUBLIC COMMENTS CAN EGLE CONSIDER?

All comments from the public are important. But it is also important to know the law is clear about what we can and cannot base our permitting decisions on. Some examples are:

What we can consider	What we can't 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

HOW CAN I COMMENT?

The AQD welcomes all comments from the public during the comment period. Before commenting, 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.

Documents about Smiths Creek Landfill can be found at: Michigan.gov/EGLEAirPublicNotice

Comments must be received by **November 26, 2024**.



Via email

EGLE-AQD-PTIPublicComments@Michigan.gov



Via US mail

Permit Section Manager, EGLE, AQD,
P.O. Box 30260
Lansing, MI 48909-7760



Via voicemail

by calling 517-284-0900



At the Virtual Public Hearing

on November 19, 2024, starting at the close of the public meeting.

The public may join the public meeting and hearing at <https://bit.ly/3Tgi5v8>. Call in to listen only at 636-651-3142 and use conference code 374288.

EGLE staff will be available to answer questions and provide assistance if needed.

EGLE promotes the equitable treatment and meaningful involvement of Michigan’s residents regarding the development, implementation, and enforcement of laws, regulations, and policies. Equitable treatment means that no group of people bears a disproportionate share of the negative consequences resulting from governmental, industrial, or commercial operations and policies. Meaningful involvement means all people have an opportunity to participate in decisions that affect their environment and/or health.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations.