

## PROPOSED PROJECT SUMMARY

### NEOGEN CORPORATION – LANSING, INGHAM 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 Neogen Corporation (Neogen). The AQD will accept comments on the proposed PTI until the close of the comment period on October 18, 2024. We will review all comments before we make a final decision on the proposal.

#### WHAT IS NEOGEN PROPOSING TO DO?

Neogen is proposing to build a food safety manufacturing facility. The facility is requesting to produce Petrifilm™ Plates used for microbial testing.

Neogen is proposing to install two (2) coating lines that apply either solvent-based adhesive or water-based media, in layers to a web substrate material, like paper, to produce coated plates. After the coating lines, the coated plates go into an enclosed conversion system where they pass through a fluidized bed of powder to complete a biological reaction. Finally, the Petrifilm™ Plate product is fumigated with ethylene oxide and packaged before leaving the site.

The proposed process would be installed in a new building with the following equipment:

- Two coating lines to apply solvent or water-based media to a web substrate,
- Media preparation operations,
- Laboratory operations,
- Two ethylene oxide (EtO) fumigation units, and
- Other ancillary 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

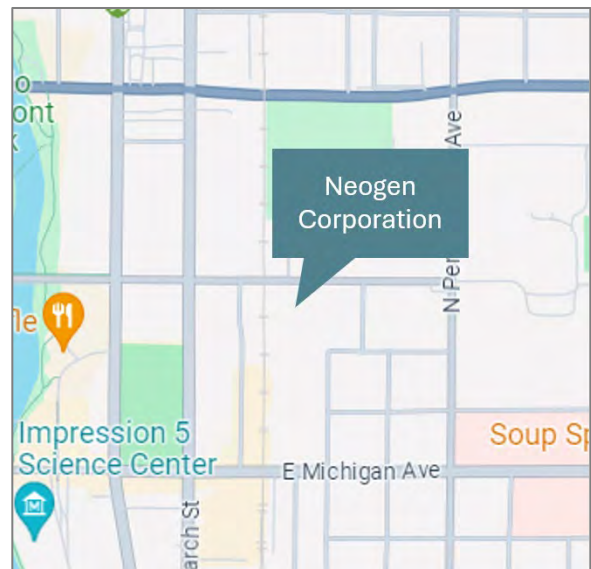


Figure 1: Proposed location of Neogen Corporation

may emit, air contaminants, such as the installation of a food safety manufacturing facility.

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.

#### WHY IS NEOGEN GOING OUT TO PUBLIC COMMENT?

There is a known public interest in EtO sterilization and fumigation. Accordingly, the public is provided the 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 (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), particulate matter equal to or less than 10 microns in diameter (PM<sub>10</sub>), particulate matter equal to or less than 2.5 microns in diameter (PM<sub>2.5</sub>), 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 proposed facility would be located in Ingham County, Michigan, which is meeting all of the NAAQS. The AQD operates one air monitoring station at 815 Filley Street, Lansing, MI. The Filley Street monitoring station measures ozone, NO<sub>2</sub>, PM<sub>2.5</sub>, and SO<sub>2</sub>. 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?

Air permits have specific requirements a company must follow. 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 EtO allowed to be used in the fumigation process and the type of fuel used at the facility.

- **Process restrictions** – requirements to ensure all equipment is operating properly and to minimize air pollutants.
- **Monitoring and Recordkeeping** – monitoring of emissions and records needed to show permit requirements are being met.

## WILL AIR QUALITY STANDARDS BE MET?

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

## 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](https://Michigan.gov/EGLEAirPublicNotice) under “Applications Open for Comment”.

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

- Example emission calculations.

AQD staff can provide additional information upon request.

## 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 we consider 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 into Spanish may be helpful.

## SUMMARY:

The AQD has reviewed the PTI application submitted by Neogen 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. All comments received during the public comment period and public hearing, if held, 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, contact Lauren Magirl, AQD, at: [MagirlL@Michigan.gov](mailto:MagirlL@Michigan.gov) or 517-582-0386.

## WHAT PUBLIC COMMENTS CAN EGLE CONSIDER?

Comments from the public are very important. However, 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 can’t consider
✓ Technical mistakes in the review	• Air, land, or water issues not part of the project
✓ Grammar and spelling mistakes	• Indoor air pollution
✓ Other rules the action should consider and why	• Traffic
✓ Why the action will not follow the rules	• Noise and lights
	• Zoning issues
	• Anything unrelated to the project

## HOW CAN I MAKE A COMMENT?

We welcome 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 Neogen can be found at: [Michigan.gov/EGLEAirPublicNotice](https://Michigan.gov/EGLEAirPublicNotice).

Ways to comment are included on the next page.

Comments must be received by October 18, 2024.



**Via email**

[EGLE-AQD-PTIPublicComments@Michigan.gov](mailto:EGLE-AQD-PTIPublicComments@Michigan.gov)



**Via voicemail**

by calling 517-284-0900



**Via US mail**

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



**At the Virtual Public Hearing, if requested**

In writing, by October 9, 2024, to the address above, it will be held on October 16, 2024.

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