PROPOSED PROJECT SUMMARY

AMERITI MANUFACTURING LLC - DETROIT, WAYNE COUNTY, MICHIGAN

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 AmeriTi Manufacturing LLC (AmeriTi). The AQD will accept comments on the proposed PTI until the close of the comment period on August 7, 2023. The AQD will also hold a virtual public hearing on July 27, 2023. We will review all comments before we make a final decision on the proposal.

WHAT IS AMERITI PROPOSING TO DO?

AmeriTi operates an existing titanium processing and manufacturing facility at 19300 Filer Avenue, Detroit, Michigan. AmeriTi is requesting to modify their current air permit including:

- Increasing the allowed amount of metal processed in the existing powder manufacturing process.
- Replacing control devices for the existing powder processes and one of the crushers.
- Removing equipment formerly owned by AmeriTi because it is now owned and operated by a different nearby company.

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 equipment AmeriTi is proposing to modify.

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

WHY IS AMERITI GOING OUT TO PUBLIC COMMENT?

AmeriTi is going out to public comment due to historical community interest in the facility.



Figure 1: location of AmeriTi

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 <u>some pollutants</u>, 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 (PM2.5), ozone and lead.

Poor air quality from high levels of pollution can cause health problems, like worsening asthma symptoms. The NAAQS are developed from research studies and set at levels to protect public

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health. This includes health protection for sensitive groups, like those with heart and lung problems.

AmeriTi is located in the portion Wayne County, Michigan which is currently meeting all of the The AQD operates 12 air monitoring stations in Wayne County and additional nearby monitoring stations in Oakland and Macomb Counties. The Wayne County stations measure all the criteria pollutants as well as some air toxics, and the Oakland and Macomb County stations measure ozone and fine particulate matter (PM2.5, Information from these air monitoring PM10). stations is available on the AOD website. 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.

How were the emissions evaluated?

A computer program called an air dispersion model was used to look at the expected impacts of the proposed project's emissions of toxic air containments (TACs) on the area surrounding AmeriTi. This type of model considers many factors, such as quantity and type of emissions, prevailing wind direction, and other factors.

Michigan has developed health-based levels for TACs under its Air Toxics rules. The model showed the maximum expected impacts of the emissions would comply with the AQD's health-based screening levels.

WHAT DO I REALLY NEED TO KNOW ABOUT THE PROPOSED PERMIT?

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

- Material limits this specifies the maximum amount of metal allowed.
- Operational restrictions How the process must be operated.

 Monitoring and Recordkeeping – requirements for what must be monitored and what records must be kept to show compliance.

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.

WAS ANY TRANSLATION INTO OTHER LANGUAGES DONE?

An evaluation of the number of people who speak English "less than very well" within a 1-mile radius of the proposed project's location was done. This is required by EGLE's <u>Limited English Proficiency Plan</u> using an environmental justice screening tool like USEPA's <u>EJSCREEN</u>. The evaluation found that translation would not be helpful based on the screening results. If accommodations are needed, please contact Laura Gramza at <u>Gramzal@Michigan.gov</u> or 517-230-4404.

WHERE CAN I FIND MORE INFORMATION?

The <u>Technical Fact Sheet</u> and the <u>proposed permit conditions</u> contain useful information. AmeriTi's application and important correspondence with the AQD can be found under PTI application No. APP-2022-0124 on the <u>Other Applications of Interest page</u>.

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 complete evaluation.
- How the project will affect air quality and public health.
- A summary of what the proposed permit requires AmeriTi to do.
- A summary of the allowed emissions that apply to the proposed project.
- The rules and regulations that apply to the proposed project.

• Example emission calculations.

AQD staff can provide further additional information upon request.

SUMMARY:

The AQD has reviewed the PTI application submitted by AmeriTi 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 proposed permit, we are requesting comments from the public.

The AQD will review all comments received during the public comment period and the virtual public hearing then decide whether to approve, approve with modifications or deny the proposed permit. If approved, the AQD may decide to add or change permit conditions based on the comments received.

WHO CAN I CONTACT?

For more information about the proposed permit, please contact Marina Ostaszewski, AQD, at: OstaszewskiM1@Michigan.gov or 517-648-7995.

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.

AMERITI MANOFACTORING ELO - DETROIT, MICHIGAN			
	What we can consider		What we can't consider
✓	Technical mistakes in the review	•	Air, land, or water issues not part of the
✓	Grammar and spelling mistakes	•	project Indoor air pollution
✓	Other rules the action should consider and why	•	Traffic Noise and lights
✓	Why the action will not follow the rules	•	Zoning issues Anything unrelated to the project

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.

More information on this and other actions open for comment can be found at:

Michigan.gov/EGLEAirPublicNotice

Comments must be received by August 7, 2023.



Via email

EGLE-AOD-PTIPublicComments@Michigan.gov



Via US mail

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



Via voicemail

by calling 517-284-0900



At the <u>virtual public hearing</u> on **July 27**, **2023**.

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