

PROPOSED PROJECT SUMMARY

VENICE PARK Recycling and Disposal Facility – LENNON, SHIAWASSEE 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 Venice Park Recycling and Disposal Facility (Venice Park RDF). The AQD will accept comments on the proposed PTI until the close of the comment period on November 6, 2023. A virtual public hearing has been scheduled on October 24, 2023; however, it will only be held if requested in writing by October 17, 2023. We will review all comments before we make a final decision on the proposal.

WHAT DOES VENICE PARK RDF CURRENTLY DO?

Venice Park RDF is an active solid waste landfill with a gas collection system located at 9536 Lennon Road, Lennon, Michigan (Figure 1). Landfill gas, consisting primarily of methane, is created when waste breaks down over time. Venice Park RDF collects the gas and sends it to a flare or to a gas-to-energy plant operated by North American Natural Resources, Inc. (NANR) which is not requesting any changes to their plant.

WHAT IS VENICE PARK RDF PROPOSING TO DO?

Venice Park RDF is proposing to install a new utility flare to replace their existing flare.

The company has also requested enforceable restrictions which will keep allowed air emissions from the proposed new flare to less than the Significant Emission Rate (SER) of each regulated pollutant. Such restrictions are referred to as synthetic minor limits. By accepting these restrictions, the project is not subject to regulations designed for larger sources of pollutants.

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

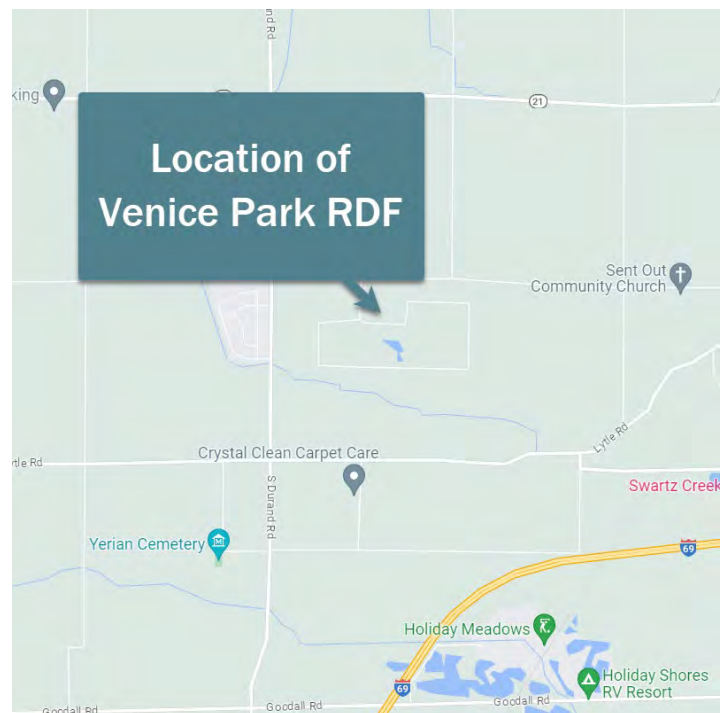


Figure 1: Location of Venice Park RDF

that emit, or may emit, air contaminants, such as the utility flare that Venice Park RDF is proposing to install.

The proposed permit conditions include requirements to make sure the project complies with all applicable air rules and regulations. They are also written to protect public health and the environment.

WHY IS VENICE PARK RDF GOING OUT TO PUBLIC COMMENT?

When a source applies for an air permit, the evaluation looks at what the potential emissions from the project would be. The potential emissions are the worse-case scenario and are calculated as if the process were going to operate continuously. Continuous operation is not typical. The permit is used to set limits restricting the emissions and sometimes the materials the process can use. This is done to ensure air quality rules and regulations are met. However, when a company has potential emissions over the threshold, but is requesting to operate with emissions greater than 90% of the that threshold, the proposed permit is required to go out for public comment. This is the case with Venice Park RDF who is requesting to limit the carbon monoxide (CO) emissions from their proposed new flare to 97.76 tons per year.

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

The proposed permit has specific requirements Venice Park RDF 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:

- **Emission limits** – amount of specific air pollutants the company would be allowed to emit.
- **Material limits** - the maximum amount of landfill gas allowed to be burned in the flare.
- **Process/Operational Restrictions** – Operating parameters for the flare to minimize emissions.
- **Monitoring and Recordkeeping** – records required to be kept that show the requirements of their permit are met.

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), 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 Shiawassee County, Michigan which is currently meeting all of the NAAQS. The AQD does not operate any air monitoring stations in Shiawassee County, however, it does operate a nearby monitoring station in Ingham County. The Ingham County station measures NO₂ and SO₂. Please see the [EGLE Air Monitoring Sites Web Map](#) for information on the air monitoring sites and the [EGLE AQI Website](#) for real-time air monitoring information. 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.

IF THE PTI IS APPROVED, WILL AIR QUALITY STANDARDS BE MET?

A computer model was used to look at the expected impacts of the emissions from the proposed project on the air quality in the area surrounding the Venice Park RDF. This type of computer model is called an air dispersion model and considers many factors, such as amount and type of emissions, prevailing wind direction and other factors.

The model showed that the expected impacts of the emissions, plus the existing monitored levels, are less than the applicable NAAQS for NO_x, CO, SO₂, 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 also comply with the AQD’s health-based screening levels.

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 Venice Park RDF location was done. 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 required.

If you need this information in an alternate format, contact EGLE-Accessibility@Michigan.gov or call 800-662-9278.

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.”

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 Venice Park RDF 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 Venice Park RDF and prepared a proposed permit. If the proposed permit is approved, it will ensure the facility meets the applicable air quality requirements.

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 virtual public hearing, if held, 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 WITH QUESTIONS?

For more information about the proposed permit or to determine if a virtual hearing was requested and will be held, please contact Megan Arduin, AQD, at: ArduinM1@Michigan.gov or 517-275-1936.

WHAT PUBLIC COMMENTS CAN EGLE CONSIDER?

Comments from the public are very important. 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 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?

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.

Documents pertaining to Venice Park RDF can be found at: Michigan.gov/EGLEAirPublicNotice

Comments must be received by November 6, 2023.



Via email

EGLE-AQD-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 Virtual Public Hearing, if requested.
in writing by October 17, 2023, to the
address above, it will be held on October
24, 2023.

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.

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