PROPOSED PROJECT SUMMARY

CREST MARINE – OWOSSO, SHIAWASSEE 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 Crest Marine. The AQD will accept comments on the proposed PTI until the close of the comment period on October 30, 2023. A virtual public hearing has been scheduled on October 17, 2023; however, it will only be held if requested in writing by October 9, 2023. We will review all comments before we make a final decision on the proposed permit.

WHAT IS CREST MARINE PROPOSING TO DO?

Crest Marine is proposing to make boats and fiberglass reinforced plastic composite products.

These types of products can be made in various ways. Crest Marine is proposing to use a gelcoat/open lamination process and a resin transfer molding (RTM) process. In the gelcoat/open lamination process, layers of different materials are put in an open mold and hardened. In the RTM process, the resins are injected into a closed mold where they harden.

Crest Marine is requesting to use materials like fiberglass resins, fiberglass gelcoats, adhesives, clean-up solvents, and a small number of miscellaneous products (mold releases, mold cleaners, and repair compounds) to make their products. These materials contain air pollutants like volatile organic compounds (VOCs) and hazardous air pollutants (HAPs), primarily styrene.

Other operations at the proposed facility will include:

- Cleaning and finishing the parts.
- Adhesive use to stick parts together.
- Clean-up activities using solvents.

Processes like what Crest Marine is requesting require an approved air permit and a thorough evaluation of the prosed air emissions before they can begin installing and operating equipment.



Figure 1: Proposed location of Crest Marine

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 processes Crest Marine is requesting.

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 CREST MARINE GOING OUT TO PUBLIC COMMENT?

The primary pollutant the facility is requesting to emit is styrene. Styrene is in a category of air pollutants called hazardous air pollutants, or HAPs. Because the potential HAP emissions from the facility will be above specific levels, public notice is required under State and Federal rules.

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, nitrogen dioxide, carbon monoxide, particulate matter equal to or less than 10 microns in diameter, particulate matter equal to or less than 2.5 microns in diameter, 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 proposed to be built in Shiawassee County, Michigan which is currently meeting all of the NAAQS.

WILL AIR QUALITY STANDARDS BE MET?

If approved, Crest Marine will have emissions of HAPs and VOCs that impact the NAAQS.

If approved, emissions of VOCs, which cause ozone, will occur. The proposed VOC emissions are not anticipated to be high enough to impact the health protective air quality standards for ozone. There will be minimal or no emissions from the other pollutants covered by the NAAQS. If approved, the proposed facility will be a major source of HAPs. This means emissions of HAPs are high enough that certain specific regulations apply to further regulate the processes the facility is requesting. These are the federal regulations for Boat Manufacturing - <u>40 CFR Part 63 Subpart VVVV</u>; and Reinforced Plastic Composites Production – <u>40 CFR Part 63 Subpart WWWW</u>. These regulations have emission limits, operational restrictions, monitoring requirements, and many other specific requirements which Crest Marine would have to follow.

The USEPA conducted a Risk and Technology Review for Subparts VVVV and WWWW, which looks at the possible risks to the public due to HAP emissions from facilities like Crest Marine. The review determined the restrictions in the regulation provide an ample margin of safety to protect public health.

Michigan has developed health-based levels for additional pollutants referred to as toxic air containments (TACs) under its Air Toxics rules. TAC emissions from the proposed project 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 Crest Marine must follow if the permit is approved. Key areas you may be interested in, or that you may want more details on, include:

- Emission limits the amount of specific air emissions allowed for each pollutant.
- Material limits the maximum amount of styrene and other chemicals allowed in the various resins and gelcoats used.
- **Process restrictions** a nuisance minimization plan for odors must be developed, implemented, and maintained.

- Operational restrictions restrictions on how materials will be handled to minimize emissions, and how waste materials are to be disposed.
- Design and equipment parameters gelcoat and open lamination processes will only occur when exhaust filters are installed, maintained, and operated in a satisfactory manner.
- Monitoring and recordkeeping records that Crest Marine would need to maintain and provide to show they are meeting the requirements of their permit.

WHAT ABOUT NOISE, TRAFFIC, AND ZONING?

The AQD evaluates the potential air emissions from a 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 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 was not required. If you need this information in an alternate format, contact <u>EGLE-</u> <u>Accessibility@Michigan.gov</u> or call 800-662-9278.

WHERE CAN I FIND MORE INFORMATION?

Other information, like the <u>Technical Fact Sheet</u> and the <u>proposed permit conditions</u> can be found at <u>Michigan.gov/EGLEAirPublicNotice</u>, 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 Crest Marine to do.
- A summary of the allowed emissions that are 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 Crest Marine 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 the virtual public hearing, if held, will be reviewed. Then a decision will be made 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.

WHO CAN I CONTACT?

For more information about the proposed permit, please contact Jeff Khaled, AQD, at: KhaledJ@Michigan.gov or 517-582-5117.

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 can't consider
✓	Technical mistakes in the review	•	Air, land, or water issues not part of the
\checkmark	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 "<u>View an Example</u>" of how to do it. You may also want to read the <u>"Public Hearings - What you should know</u>" card.

Documents pertaining to Crest Marine can be found at: <u>Michigan.gov/EGLEAirPublicNotice.</u>

Comments must be received by October 30, 2023.

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

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At the Virtual Public Hearing, if requested

in writing by October 9, 2023 to the address above, it will be held on October 17, 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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