

PROPOSED PROJECT SUMMARY

INDUSTRIAL METAL COATING – STERLING HEIGHTS, MACOMB 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 Industrial Metal Coating (IMC). The AQD will accept comments on the proposed PTI until the close of the comment period on March 13, 2024. We will review all comments before we make a final decision on the proposal.

WHAT DOES IMC CURRENTLY DO?

IMC operates an existing facility located at 6070 Eighteen Mile Road, Sterling Heights, Michigan (Figure 1). The facility coats metal parts used in the automotive industry. Parts are placed on racks and coated using an electrodeposition (e-coat) process. E-coating is a method of painting that uses electrical current to deposit paint on a surface. After the parts are cured, they are removed from the racks. The racks are placed in a burn-off oven to remove the cured coating and prepare them to be reused.

WHAT IS IMC PROPOSING TO DO?

IMC is proposing to modify two of their four existing burn-off ovens to install and operate additional air pollution control devices called secondary chamber afterburners (afterburners). The afterburners are required by a recent [consent judgement](#) between IMC and the AQD.

IMC currently has afterburners on their other two existing burn-off ovens. This request will ensure all four burn-off ovens have appropriate air pollution control 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 may emit, air contaminants, such as the afterburners IMC is proposing to install.



Figure 1: Location of the IMC facility

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 IMC OPEN TO PUBLIC COMMENT?

IMC has received odor complaints from the e-coat process and associated burn-off ovens. IMC is considered a source of public interest, so the application requires public comment.

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 criteria 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 Macomb County, Michigan which is currently meeting all of the NAAQS. The AQD operates two air monitoring stations in Macomb County. The Warren Fire Station measures ozone and the New Haven station measures fine particulate matter (PM_{2.5}), ozone, and carbonyl compounds (which includes formaldehyde). Note, the purpose of the air monitoring stations is to assess the regional or area-wide air quality over time and are not used to determine if a specific source is in compliance with their air permit.

The burn-off ovens are a source of criteria pollutants, but the potential to emit for each pollutant is very low and is not expected to have an appreciable effect on the current air quality.

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

The proposed permit has specific requirements IMC 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** - the type of material allowed to be burned off in the ovens.
- **Operational restrictions** – how the burn-off ovens must be operated.

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

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 [Limited English Proficiency Plan](#) using an environmental justice screening tool like USEPA’s [EJSCREEN](#). The evaluation found that translation into Arabic would be helpful. The AQD translated:

- [the Notice of Hearing](#).
- [the Proposed Project Summary](#),
- [and Interested Party Letter](#)

If translation into other languages is needed or if there are other accessibility concerns with this public comment period, please send requests to EGLE-Accessibility@Michigan.gov.

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 IMC 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 IMC 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. The AQD will review all comments received during the public comment period and public hearing, if held, then decide 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 Jacob Young, AQD, at: YoungJ30@Michigan.gov or 517-582-5218.

HOW CAN I MAKE A COMMENT?

The AQD welcomes 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 IMC can be found at: Michigan.gov/EGLEAirPublicNotice.

Comments must be received by March 13, 2024.



Via email
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 February 21, 2024 to the address above, it will be held on February 29, 2024

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
<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

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