

# PROPOSED PROJECT SUMMARY

## GENERAL MOTORS LLC – DETROIT, WAYNE COUNTY, MICHIGAN

### GENERAL MOTORS LLC

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 General Motors LLC Detroit-Hamtramck Assembly (GM). The AQD will accept comments on the proposed PTI until the close of the comment period on March 14, 2022. We will review all comments before we make a final decision on the proposal.

### WHAT IS GM PROPOSING TO DO?

GM is proposing to make changes to an existing automotive manufacturing process permitted under [PTI No. 209-19](#), including:

- Additional natural gas equipment and usage
- New emergency equipment
- New sealer and adhesive material
- Changes to stack parameters and locations

### 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 automotive manufacturing process GM 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 laws and regulations.

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

The project permitted under PTI #209-19 used a process called netting to show that it was not subject to certain regulations. This type of request is required to go out for public comment.

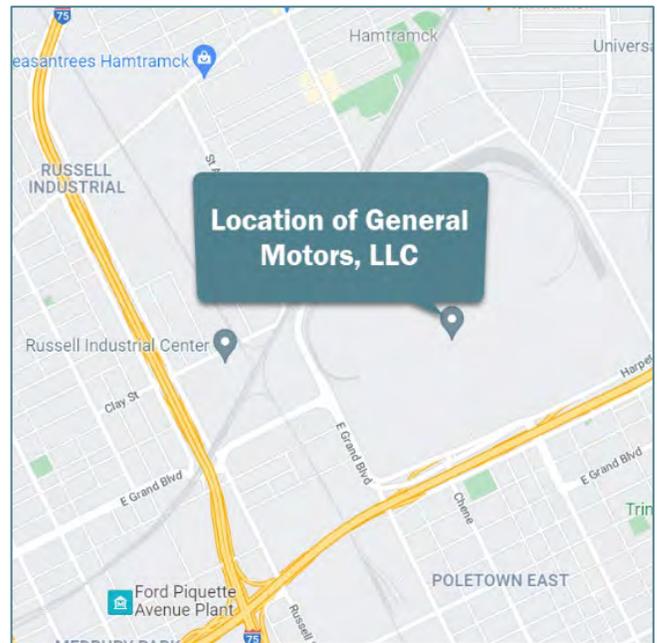


Figure 1: Location of existing GM facility

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

There are specific requirements GM 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 –the amount of specific air pollutants GM would be allowed to emit. GM is requesting increases in emissions of:
  - Volatile organic compounds (VOCs)
  - Oxides of nitrogen (NOx)

- Particulate matter (PM)
  - PM less than 10 microns in diameter (PM10)
  - PM less than 2.5 microns in diameter (PM2.5)
  - Carbon Monoxide (CO)
  - Sulfur dioxide (SO<sub>2</sub>)
  - Greenhouse Gases
- Material limits - how much or what type of materials may be used, such as natural gas.
  - Design restrictions - equipment requirements, including how and when control devices must operate.
  - Operational restrictions –how materials must be handled to minimize emissions. Specifies the end date of the initial low production period.
  - Monitoring and recordkeeping – records that must be kept showing they are meeting the requirements of their permit.

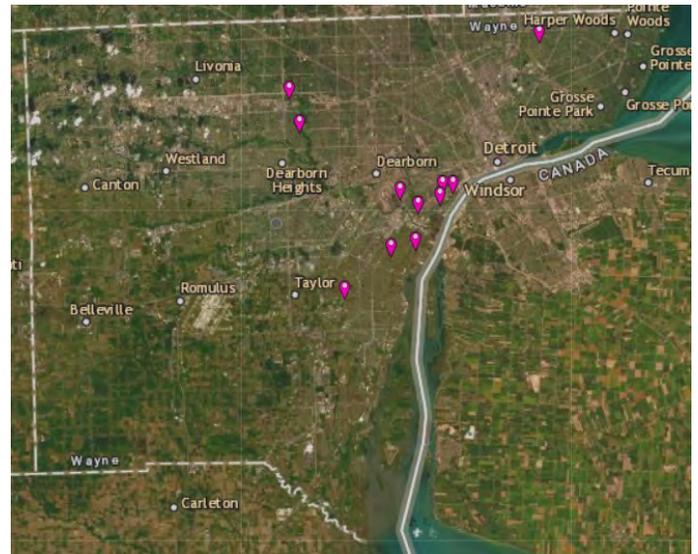
### WHAT IS THE CURRENT AIR QUALITY IN THE AREA?

The United States Environmental Protection Agency has developed health-protective standards for specific air pollutants. These standards are called the National Ambient Air Quality Standards (NAAQS).

There are NAAQS for [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 (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. 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 a portion of Wayne County, Michigan which is currently meeting all of the NAAQS except for ozone. The AQD operates 11 [air monitoring station\(s\)](#) in Wayne County. Combined, the Wayne County stations measure all NAAQS pollutants. Please note, the purpose of the air monitoring stations is to evaluate the regional or area-wide air quality and is not used to determine if a specific source is complying with their air permit.



### WHAT IS A “NONATTAINMENT AREA”?

Areas of the state where air concentrations of pollutants are below the NAAQS are called attainment areas. An area is designated as nonattainment when concentrations are above an air quality standard. This is determined using many factors including a three-year average of air monitor data and air dispersion modeling. The automotive assembly plant is in an area that is in nonattainment for ozone.

### HOW CAN GM REQUEST AN INCREASE IN EMISSIONS IN A NONATTAINMENT AREA?

The air pollution control rules for a nonattainment area are designed to allow new growth while still bringing the area back into attainment. If a project

wants a change in emissions higher than a specific threshold, it would be subject to Nonattainment New Source Review (NNSR) permitting.

To see if NNSR was required, GM performed a “netting analysis”. A netting analysis compares past emissions, certain emission increases and/or decreases, and the requested emissions. If the total increase in emissions from this comparison for either NO<sub>x</sub> or VOC is greater than 40 tons per year (tpy), then that pollutant must go through a nonattainment review.

The AQD reviewed the analysis that GM did and determined a nonattainment review is not required. More information about this analysis can be found in the [Technical Fact Sheet](#).

### WILL THE FACILITY MEET AIR QUALITY STANDARDS?

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

The model showed that the expected impacts of the requested emissions, plus the existing measured levels, are less than the NAAQS for NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.

Michigan has developed health-based 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 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 [US EPA’s EJSCREEN](#). The results showed translation to Arabic and Bengali would be helpful. Translated documents, like the Notice of Hearing, the Proposed Project Summary, and the Interested Party Letter can be found at [Michigan.gov/EGLEAirPublicNotice](#) choose “Applications open for comment”.

### 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.

### WHERE CAN I FIND MORE INFORMATION?

You may contact AQD Staff and find more information about the PTI application in the [Technical Fact Sheet](#), which has additional details about the project and how it will meet the rules and regulations. such as:

- A summary of the reviews completed by the AQD staff.
- How the project will affect air quality and public health.
- A summary of what the proposed permit would require GM to do.
- A summary of the emissions requested and included in the proposed permit.
- The rules and regulations that apply to the project.
- Example emission calculations.

### SUMMARY:

The AQD has reviewed the PTI application 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, 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 David Thompson, AQD, at: [ThompsonD22@Michigan.gov](mailto:ThompsonD22@Michigan.gov) or 517-582-5095.

**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 in the following table.

What we can consider	What we can't consider
<ul style="list-style-type: none"> <li>✓ Technical mistakes in the review</li> <li>✓ Grammar and spelling mistakes</li> <li>✓ Other rules the action should consider and why</li> <li>✓ Why the action will not follow the rules</li> </ul>	<ul style="list-style-type: none"> <li>• Air, land, or water issues not part of the project</li> <li>• Indoor air pollution</li> <li>• Traffic</li> <li>• Noise and lights</li> <li>• Zoning issues</li> <li>• Anything unrelated to the project</li> </ul>

**HOW CAN I MAKE A COMMENT?**

The AQD welcomes comments from the public until **March 14, 2022**. Prior to making a comment, it is a good idea to “[View an Example](#)”. You may also want to read the “[Public Hearings - What you should know](#)” card.

Documents pertaining to GM can be found at: [Michigan.gov/EGLEAirPublicNotice](http://Michigan.gov/EGLEAirPublicNotice)



**Via email**  
[EGLE-AQD-PTIPubliccomments@Michigan.gov](mailto:EGLE-AQD-PTIPubliccomments@Michigan.gov)



**Via US mail**  
Annette Switzer, 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.**  
The [virtual public hearing](#) will be held on March 3, 2022.

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.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations.