

PROPOSED PROJECT SUMMARY

BRIDGING NORTH AMERICA – DETROIT, WAYNE COUNTY, MICHIGAN

BRIDGING NORTH AMERICA

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 Bridging North America (BNA). The AQD will accept comments on the proposed PTI until the close of the comment period on March 14, 2022. A virtual public hearing is being held on March 1, 2022. We will review all comments before we make a final decision on the proposal.

WHAT IS BNA PROPOSING TO DO?

BNA is proposing to install and operate new natural gas and diesel fired combustion units for the future US Port of Entry and Gordie Howe International Bridge (GHIB). The equipment is intended to ensure that the border crossing is open at all times including during power outages. The equipment will be located at 1001 Springwells Court, Detroit, Michigan (Figure 1). This proposed facility will be located just south of the current Ambassador Bridge.



Figure 1. Location of the Proposed Facility and Air monitoring sites

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 new equipment BNA is proposing to install.

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.

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

The proposed permit contains specific requirements BNA 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 – this is the amount of specific air pollutants that BNA would be allowed to emit.

- Process restrictions – Requirement to use a control device on the cogeneration unit.
- Operational restrictions – Restrictions on the hours of operation for the cogeneration unit and the emergency engines. Additional restrictions on which engines and boilers can operate at the same time.
- 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 \(SO₂\)](#), [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. 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 located in the portion of Wayne County, Michigan which is currently meeting all of the NAAQS except for SO₂ and ozone. The AQD operates 11 [air monitoring station\(s\)](#) in Wayne County. The Detroit SW High School station is less than a mile away from the proposed location and measures NO₂, metals, PM₁₀, PM_{2.5}, SO₂, carbon black, volatile organic compounds (VOCs), and carbonyls. Ozone is regulated through its precursor's nitrogen oxides (NO_x) and VOCs. Please note, 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 complying their air permit.

WILL THE FACILITY MEET AIR QUALITY STANDARDS?

A computer model was used to look at the project BNA is proposing and the emissions being requested. 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 emissions, plus the existing monitored levels, are less than the applicable NAAQS for NO₂.

Michigan has developed health-based levels for additional pollutants referred to as toxic air containments (TACs) under its Air Toxics rules. If the requested emissions of TACs are above certain levels, they must also be looked at with a computer model. All TACs emitted from the project were evaluated against the health-based screening levels using Rule 227. In this case, the proposed emissions of acrolein and formaldehyde emissions were over the screening levels. Acrolein and formaldehyde were further reviewed using air dispersion modeling and found to be below their respective allowed health-based screening levels. Other proposed TAC emissions from the project would also comply with the AQD's allowed health-based screening levels.

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?

There are two ways to find more information about the PTI application: The Technical Fact Sheet has additional details about the project and how it will meet the rules and regulations and AQD staff can provide additional information upon request. Here

are some examples of information you may find useful:

- How the project will affect air quality and public health.
- What the proposed permit would require BNA to do.
- The emissions limits in the proposed permit.
- The rules and regulations that apply to the project.
- Example emission calculations.

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 [USEPA’s EJSCREEN](#). The evaluation found that translation to Spanish 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”.

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 the virtual public hearing, then decide whether to approve, approve with changes 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 Ms. Janelle Trowhill, AQD, at: TrowhillJ1@Michigan.gov or 517-582-5312.

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 BNA can be found at: [Michigan.gov/EGLEAirPublicNotice](#)

Comments must be received by **March 14, 2022**.

HOW CAN I MAKE A COMMENT? (CONTINUED)

Comments must be received by **March 14, 2022**.



Via email

EGLE-AQD-PTIPubliccomments@Michigan.gov



Via voicemail

by calling 517-284-0900



Via US mail

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



At the Virtual Public Hearing.

The [virtual public hearing](#) will be held on
March 1, 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.