

## PROPOSED PROJECT SUMMARY

### LANSING BOARD OF WATER & LIGHT – LANSING, EATON 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 Lansing Board of Water & Light (LBWL). The AQD will accept comments on the proposed PTI until the close of the comment period on May 14, 2024. We will review all comments before we make a final decision on the proposal.

#### WHAT IS LBWL PROPOSING TO DO?

LBWL is proposing to install a new natural gas-fired reciprocating internal combustion engine (RICE) plant on the same property as the existing Erickson Station and Delta Energy Park. The proposed RICE plant will generate electricity and consist of the following equipment:

- Six (6) natural gas-fired RICE engines
- Two diesel-fired emergency RICE
- One dew point heater
- Various natural gas-fired space heaters

#### 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 pollutants, such as those emitted by the proposed natural gas-fired RICE plant.

We have 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 LBWL GOING OUT TO PUBLIC COMMENT?

The current LBWL facility is an existing major source of air pollutants. “Major source” is a classification given to a facility when the quantity of pollutants that are or may be released is over specific thresholds.

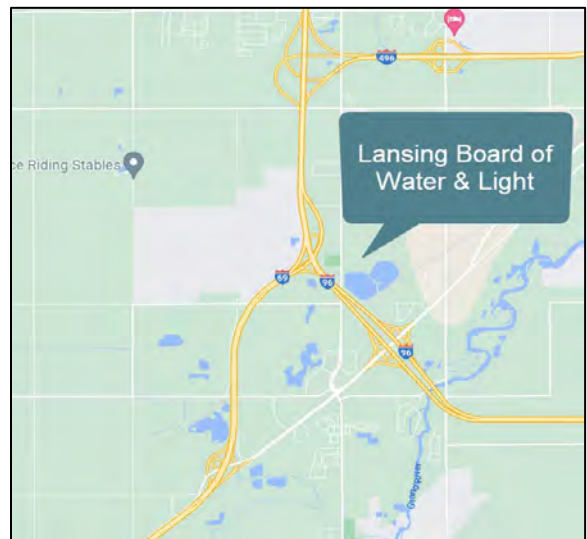


Figure 1: Lansing Board of Water & Light Location

Major sources are some of the largest emitters of air pollutants and require more oversight, testing, recordkeeping, and reporting than sources that are not major.

Under the State of Michigan Air Pollution Control Rules, the new RICE plant is considered a major modification at an existing major source of air pollutants because it has the potential to emit above certain levels for several air pollutants. Per Michigan’s Air Pollution Control Rules, all major modifications are required to go out to 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 pollutants](#), including 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 (PM<sub>10</sub>), particulate matter equal to or less than 2.5 microns in diameter (PM<sub>2.5</sub>), 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 located in Eaton County, Michigan which is currently meeting all of the NAAQS. The AQD does not operate [air monitoring stations](#) in Eaton County, however, we have nearby monitoring stations in Ingham and Clinton Counties. The Ingham station measures ozone, NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and SO<sub>2</sub>, and the Clinton station measures ozone. 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 complies with their air permit.

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

The proposed permit has specific requirements LBWL 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 allowed.
- **Material limits** - The maximum amount of fuel the plant is allowed to burn.
- **Process restrictions** – The requirement for a malfunction abatement plan as well as a plan to minimize emissions during startup and shutdown of the RICE units.

- **Operational restrictions** – Requires proper operation of emission control equipment.
- **Monitoring and Recordkeeping** – Required recordkeeping to ensure that compliance with the requirements of the permit are met.

### WILL AIR QUALITY STANDARDS CONTINUE TO 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 new RICE plant. This type of computer model is called an air dispersion model and considers many factors, such as the amount and type of emissions, the 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<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>.

Michigan has developed health-based screening levels for additional pollutants referred to as toxic air contaminants (TACs) under its Air Toxics rules. The proposed TAC emissions from the project would comply with the AQD's health-based screening levels.

### IS THIS RICE PLANT NEEDED?

The AQD does not make determinations of whether a new plant or an increase in utilization at an existing power plant is needed when evaluating PTI applications.

### 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 the authority to regulate noise or traffic outside the facility and does not have the 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 [Limited English Proficiency Plan](#) using an environmental justice screening tool like USEPA’s [EJSCREEN](#). The evaluation found that translation was not needed.

### 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 proposed 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 LBWL 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.
- Example emission calculations.

AQD staff can provide additional information upon request.

### SUMMARY:

We have reviewed the PTI application submitted by LBWL 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 we act on the PTI application, we are requesting comments from the public. We will review all comments received during the public comment period and public hearing, if held, and 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, contact Thomas Hercula, at: [HerculaT@Michigan.gov](mailto:HerculaT@Michigan.gov) or 517-275-2912.

### 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 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 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 pertaining to Lansing Board of Water & Light can be found at:

[Michigan.gov/EGLEAirPublicNotice](#)

Comments must be received by May 14, 2024.



**Via email**

[EGLE-AQD-PTIPublicComments@Michigan.gov](mailto:EGLE-AQD-PTIPublicComments@Michigan.gov)



**Via US mail**

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EGLE, AQD,  
P.O. Box 30260  
Lansing, MI 48909-7760



**Via voicemail**

by calling 517-284-0900



**At the Virtual Public Hearing, if requested.**

The virtual public hearing will be held on  
**May 1, 2024.**

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