

PROPOSED PROJECT SUMMARY

COPPERWOOD RESOURCES, INC. – IRONWOOD AND WAKEFIELD TOWNSHIPS, GOGEBIC 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 Copperwood Resources, Inc. (Copperwood). The AQD will accept comments on the proposed PTI until the close of the comment period on November 13, 2024. We will review all comments before we make a final decision on the proposal.

WHAT IS COPPERWOOD PROPOSING TO DO?

Copperwood is proposing to build an underground copper and silver mine and install an aboveground ore processing facility in parts of Ironwood and Wakefield Townships in Gogebic County. Propane and natural gas-fueled heaters would be used in the mine to provide heat during cold weather.

Ore would be processed by crushing and grinding it then mixing it with compounds to separate the copper and silver from the rest of the material. The copper-silver-containing portion, called concentrate, would be loaded into trucks and transported off-site for further processing.

The rest of the material, or tailings, would be put in a tailings disposal facility (TDF) on site. The TDF would be constructed over the life of the mine. During mining, most of the TDF would be covered by water. At the end of mining, the tailings in the TDF would be covered to prevent wind erosion.

Copperwood wants to install a diesel fuel generator to provide electricity while the facility is under construction as well as three natural gas-fired generators to provide electricity during operation.

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

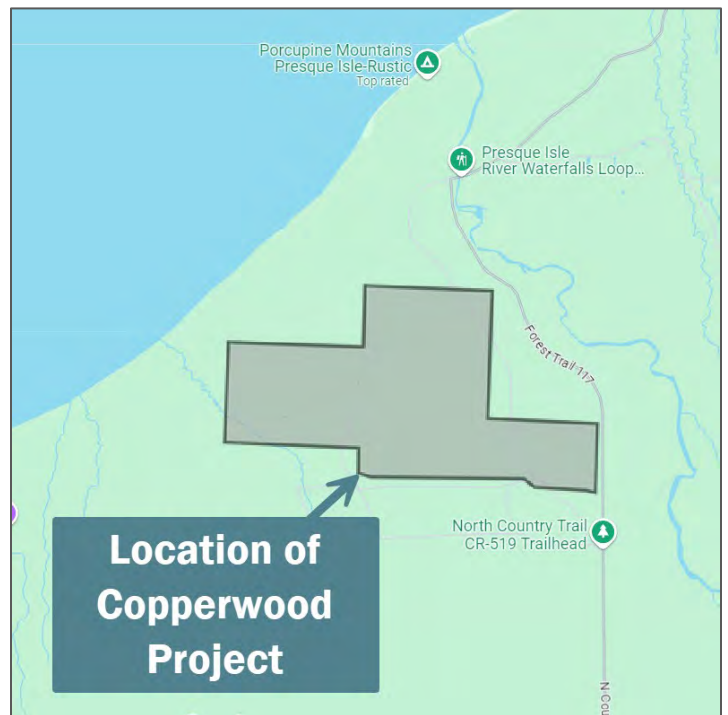


Figure 1: Location of Copperwood Project

underground mine and aboveground ore processing facility Copperwood 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 rules and regulations.

WHY IS THE PROPOSED PERMIT OPEN FOR PUBLIC COMMENT?

Copperwood's proposed project is near the Porcupine Mountains Wilderness State Park and Lake Superior. There has been historical public

interest in the proposed facility. The law requires that proposed projects with known public interest allow the public an opportunity to comment on the proposed permit conditions.

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 (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 proposed for Gogebic County, Michigan which is currently meeting all of the NAAQS. The AQD does not operate air monitoring stations in Gogebic County, however, the AQD does have a nearby monitoring station in Negaunee Township near Marquette, Michigan. The Negaunee Township station measures PM_{2.5}.

WILL AIR QUALITY STANDARDS 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 proposed facility. This type of computer model is called an air dispersion model and considers many factors, such as the amount 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 all pollutants.

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

WHAT DO I NEED TO KNOW ABOUT THE PROPOSED PERMIT?

The proposed permit has specific requirements Copperwood 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 to be released.
- **Material limits** - specifies the amounts and types of fuels allowed to be used and the maximum amount of blasting agent that can be used.
- **Process restrictions** – requirements to ensure all equipment is operating properly to minimize air pollutants, which includes having a Malfunction Abatement Plan and a Nuisance Minimization Plan for Fugitive Dust.
- **Monitoring and Recordkeeping** – monitoring of equipment and records that would be kept showing the process is meeting the permit requirements.

IS THIS MINE NEEDED?

We are required to evaluate air permit applications as they are submitted. We do not determine if a proposed project is needed when evaluating PTI applications.

WHAT ABOUT WATER OR LAND CONCERNS?

The AQD does not regulate water or land use. Copperwood has acquired all other EGLE permits required to construct the facility, including those related to water and land use.

WAS ENVIRONMENTAL JUSTICE CONSIDERED FOR THIS PROJECT?

Part of opening a proposed permit for public comment involves evaluating the community around the proposed project, including environmental justice, translation, and other community specific concerns. Full details of how we consider this in permitting can be found in [“Including Environmental Justice: Air Permitting in Michigan”](#)

The language evaluation looked at the number of people who speak English “less than very well” within a 19-mile radius of the proposed project’s location. 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.” Copperwood’s application and important correspondence with the AQD can be found under PTI application No. APP-2023-0218 on the [Other Applications of Interest](#) page.

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 Copperwood 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 Copperwood 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. All comments received during the public comment period and public hearing will be reviewed, then we will decide whether to approve, approve with modifications, or deny the proposed PTI application. If approved, we may add or change permit conditions based on the comments received.

WHO CAN I CONTACT?

For more information about the proposed permit, please contact Andrew Drury, AQD, at: DruryA@Michigan.gov or 517-648-6663.

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.

More information about this proposed project can be found at: Michigan.gov/EGLEAirPublicNotice

Comments must be received by
November 13, 2024.



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



At the Virtual Public Hearing

The virtual public hearing will be held on **October 30, 2024**, starting at the close of the public informational session. The public may join at: <https://bit.ly/4cQm8oW>. The informational session will start at **6:00 p.m. Central Daylight Time (7:00 p.m. Eastern Daylight Time)**. Call in to listen only at 636-651-3142 and use conference code 374288.

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