



STATE OF MICHIGAN  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
 SOUTHEAST MICHIGAN DISTRICT OFFICE



RICK SNYDER  
 GOVERNOR

DAN WYANT  
 DIRECTOR

October 1, 2015

Mr. Howard Mack  
 General Manager  
 Mack Industries, Inc.  
 8265 White Lake Road  
 White Lake, MI 48386-1157

SRN: N6966 , Oakland County

Dear Mr. Howard :

**VIOLATION NOTICE**

On September 29, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Mack Industries, Inc (Mack). located at 8265 White Lake Road, White Lake, Michigan. The purpose of this inspection was to determine Mack's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules.

During the September 3, 2015 inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Concrete plant for precast products and corresponding two silo baghouses for:  1. 90,000-pound cement silo 2. 60,000-pound fly-ash silo	Rule 336.1910	The two baghouses have not been operating satisfactorily as indicated by visible emissions based upon pictures AQD staff took (10:25 a.m., September 24, 2015). You stated that the shaker mechanisms for both baghouses (2) have not been operating properly. As a result, the baghouses were, and continue to be, overwhelmed. I confirmed that Mack had the parts for necessary repair.

I observed excessive dust from both paved and unpaved surfaces. We discussed that paved areas be swept at least twice per week (more often if needed) and unpaved traffic areas be maintained wet at all times. Please note the following Rule 336.1289(d) fugitive dust plan.

The owner or operator shall implement the following fugitive dust plan:

- A. The drop distance at each transfer point throughout the plant shall be reduced to the minimum the equipment can achieve.
- B. On-site vehicles shall be loaded to prevent their contents from dropping, leaking, blowing or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within six inches of the top of any sideboard, side panel or tailgate, otherwise, the truck shall be tarped.
- C. For site roadways and the plant yard:
  - 1. The dust on the site roadways and the plant yard shall be controlled by applications of water (*wet at all times*), calcium chloride or other acceptable and approved dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet an opacity limit of five percent.
  - 2. All paved roadways and the plant yards shall be swept as needed (*minimum twice per week*) between applications.
  - 3. Any material spillage on roads shall be cleaned up immediately.
  - 4. A record of all applications of dust suppressants and roadway and plant yard sweepings shall be kept on file for the most recent five-year period and be made available to the AQD upon request.
- D. For storage piles:
  - 1. Stockpiling of all nonmetallic minerals shall be performed to minimize drop distance and control potential dust problems.
  - 2. Stockpiles shall be watered on an as needed basis in order to meet an opacity limit of five percent. Equipment to apply water or dust suppressant shall be available at the site or on call for use at the site within a given operating day.
  - 3. A record of all watering shall be kept on file for the most recent five-year period and be made available to the AQD upon request.

The provisions and procedures of this plan are subject to adjustment by written notification from the AQD, if following an inspection, the AQD finds the fugitive dust requirements and/or the permitted opacity limits are not being met.

Act 451, Rule 910, requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 22, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Mack believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Mack. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Iranna Konanahalli  
Senior Environmental Engineer  
Air Quality Division  
Konanahallii@michigan.gov or 586-753-3741

IK/DC

cc: Ms. Lynn Fiedler, DEQ  
Ms. Barbara Rosenbaum, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Ethridge, DEQ