



March 10, 2023

Joyce Zhu  
District Supervisor  
Michigan Department of Environment, Great Lakes, and Energy  
Air Quality Division – Warren District  
27700 Donald Court  
Warren, MI 48092

Subject: Response to Violation Notice dated December 14, 2022  
iMBranded (SRN: N2528)

Dear Joyce:

iMBranded, Source Registration Number (SRN) N2528, received a Violation Notice (VN) from the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) dated December 14, 2022. The VN comes as the result of an inspection of the iMBranded facility at 500 West Long Lake Road in Troy Michigan on December 9, 2022 by EGLE - AQD. During the inspection EGLE-AQD reviewed documentation and facility operation to determine compliance with the requirements of the facility's Permit to Install (PTI) 13-22 issued by EGLE-AQD on February 10, 2022. EGLE-AQD observed the following as communicated to iMBranded in the VN:

**Table 1: VN Summary Table from VN Dated December 9, 2022**

Process Description	Rule/Permit Condition Violated	Comments
EUAUTOBOOTH (Automatic coating booth) and EUBOOTH1 (Manual spray coating boot)	PTI No. 13-22	iMBranded failed to comply with special conditions of the permit. <sup>B</sup>
<sup>B</sup> iMBranded failed to show compliance with the emissions and materials limits, perform the required calculations, keep the required records (daily, monthly, and 12-month period), conduct US EPA RM24 analysis, submit the required notification, etc. In addition, iMBranded installed an obstruction elbow on the stack in violation of the permit.		

The following sections outline iMBranded's understanding of the Special Condition (SC) requirements and a summary of the actions proposed to correct the issues observed by EGLE-AQD.

**Emission and Material Limits**

PTI 13-22 includes both emission and material limits for the operation of EUAUTOBOOTH and EUBOOTH1 in SC I and SC II of the special conditions for the units. Based on the records provided in Attachment 1 iMBranded has summarized compliance with relevant material and emission limits below.

**Table 2: EUAUTOBOOTH Emission and Material Limit Compliance Summary**

Pollutant/Material	CAS	Special Condition	Unit	Limit	2022 Actual
Volatile Organic Compounds (VOC)	NA	SC I.1	TPY <sup>1</sup>	10.2	1.18
Diethylene glycol monomethyl ether	111-77-3	SC I.2	lb/day <sup>2</sup>	52.33	0.10
Triethylamine	121-44-8	SC I.3	lb/day <sup>2</sup>	1.03	0.00
Primer		SC II.1	gal/yr <sup>3</sup>	388	0
Ultraviolet (UV) Topcoat		SC II.2	gal/yr <sup>3</sup>	3356	625
UV Paint		SC II.3	gal/yr <sup>3</sup>	440	20
Stain		SC II.4	gal/yr <sup>3</sup>	538	339
Primer		SC II.5	lb VOC/gal <sup>4</sup>	0.44	0
UV Topcoat		SC II.6	lb VOC/gal <sup>4</sup>	0.18	0.39
UV Paint		SC II.7	lb VOC/gal <sup>3</sup>	0.11	0.2
Stain		SC II.8	lb VOC/gal <sup>4</sup>	1.35	6.63

- 1- Tons per year
- 2- lb/day = pounds per day
- 3- gal/yr = gallons per year
- 4- lb VOC/gal = pounds of VOCs per gallon

**Table 3: EUBOOTH1 Emission and Material Limit Compliance Summary**

Pollutant/Material	CAS	Special Condition	Unit	Limit	2022 Actual
VOC		SC I.1	TPY <sup>1</sup>	7.7	0.64
Diethylene glycol monobutyl ether	112-34-5	SC I.2	TPY <sup>1</sup>	0.46	0.151
Primer		SC II.1	gal/yr <sup>2</sup>	338	0
Stain		SC II.2	gal/yr <sup>2</sup>	538	339
Paint		SC II.3	gal/yr <sup>2</sup>	1108	643
Clear Topcoat		SC II.4	gal/yr <sup>2</sup>	1013	262
Solvent (lacquer thinner)		SC II.5	gal/yr <sup>2</sup>	10	0
Primer		SC II.6	lb VOC/gal <sup>3</sup>	0.44	0.00
Stain		SC II.7	lb VOC/gal <sup>3</sup>	1.35	6.63
Paint		SC II.8	lb VOC/gal <sup>3</sup>	5.49	4.67
Clear Topcoat		SC II.9	lb VOC/gal <sup>3</sup>	1.68	5.42

- 1- Tons per year
- 2- gal/yr = gallons per year
- 3- lb VOC/gal = pounds of VOCs per gallon

**Process/Operation Restrictions and Design/Equipment Parameters**

The two units installed at iMBranded have a very similar set of requirements for the handling of waste and other VOC-containing materials along with equipment operational requirements on installed equipment. iMBranded understands that the material handling operations currently in place during the

EGLE-AQD site visit meet the requirements under EUAUTOBOOTH SC III and EUBOOTH1 SC III. These include the handling of waste from the process, including clean-up solvents and filters, appropriately along with the proper handling and storage of virgin coatings and solvents involved in process operations. Similarly, the design/equipment parameter conditions under EUAUTOBOOTH SC IV and EUBOOTH1 SC IV detail requirements for exhaust filters and spray applicators that are currently installed in plant equipment and were present during EGLE-AQD's site visit. iMBranded understands that it is in full compliance with the permit conditions outlined in SC III and SC IV of both the EUAUTOBOOTH and EUBOOTH1 sections of the special conditions.

### **Testing/Sampling**

For all coatings applied at the facility, iMBranded is required to determine the VOC content, water content, and density as applied per EUAUTOBOOTH SC V and EUBOOTH1 SC V. It is iMBranded's intention to maintain appropriate documentation from coating manufacturers to fulfill this requirement. Further, iMBranded can make available to EGLE-AQD, upon request, manufacturers' data for the coatings used at the facility. However, as documented in the special condition, manufacturers' data is only acceptable to meet these requirements with prior, written EGLE-AQD approval. Please consider this letter iMBranded's request to utilize appropriate manufacturer's formulation data to determine VOC content of the coatings as applied. Note that applicable manufacturer's data to support calculation of actual VOC emissions in 2022 are included in Attachment 2.

### **Monitoring and Recordkeeping**

The emission and material limits outlined for each emission unit are supported by monitoring and recordkeeping requirements listed in EUAUTOBOOTH SC VI and EUBOOTH1 SC VI. Attachment 1 includes documentation of material composition, material usage, VOC emissions, and relevant Toxic Air Contaminant (TAC) emissions as required under SC VI for both EUAUTOBOOTH and EUBOOTH1 sections of PTI 13-22. Additionally, as noted above, Attachment 2 contains relevant composition information on each coating used to inform the emissions calculations.

### **Reporting**

EUAUTOBOOTH SC(VII) and EUBOOTH1 SC(VII) require that iMBranded notify EGLE-AQD within 30 days after completion of the "installation, construction, reconstruction, relocation, or modification" authorized by PTI 13-22. iMBranded has submitted a notification as of March 10, 2023

### **Stack/Vent Restrictions**

In support of the permit application, iMBranded modeled emissions from the two process lines. This modeling included stack characteristics that are outlined in the permit in EUAUTOBOOTH SC(VIII) and EUBOOTH1 SC(VIII). iMBranded has identified a qualified contractor to remove the "obstruction elbow" identified in the VN which was observed on the stack for EUAUTOBOOTH. The work to ensure the stacks for the two units meet the requirements listed in PTI 13-22, as presented in the permit application, was completed by February 1, 2023. A photo of the stacks on the roof are included as Attachment 3.

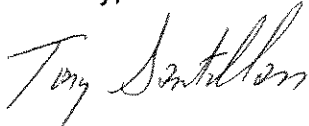
### **Proposed Compliance Solution**

As shown in Tables 1 and 2 above, the actual emission rate from the two coating lines is significantly less than was anticipated when PTI 13-22 was issued. Moving forward iMBranded anticipates

continued reduction and potential elimination of coating processes at their Troy, Michigan facility. Further, due to ongoing changes in the market, an accurate prediction of the coatings required for use in these limited quantities is presenting a challenge to iMBranded operations staff. As there is no longer a need for VOC emissions greater than 10 TPY iMBranded would like to discuss with EGLE-AQD the revocation of the current PTI 13-22 and pursuit of permitting the coating lines under the General PTI for Coating Lines Emitting up to 10 TPY of VOCs. Coverage under the general permit would appropriately limit emissions from the facility while offering some flexibility of VOC content use as is appropriate for the highly variable nature of iMBranded's customer's coating requirements.

iMBranded looks forward to working with EGLE-AQD to resolve this matter. If you have any questions or comments on the proposed path forward please contact me at 248-537-8548 or [tsantellan@imbranded.com](mailto:tsantellan@imbranded.com).

Sincerely,



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Attachments:

- Attachment 1: Compliance Records
- Attachment 2: Material Documentation
- Attachment 3: Stack Photograph

cc: Iranna Konahahallii – Senior Environmental Engineer – EGLE AQD  
Jenine Camilleri, Enforcement Unit Supervisor – EGLE  
Ben Lemley – TRC