



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

December 14, 2022

VIA E-MAIL AND U.S. MAIL

Jim Whitehead, CEO
iMBranded
500 West Long Lake Road
Troy, Michigan 48098-4540

SRN: N2528, Oakland County

Dear Jim Whitehead:

VIOLATION NOTICE

On December 9, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of iMBranded located at 500 West Long Lake Road, Troy, Michigan. The purpose of this inspection was to determine iMBranded'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 13-22 dated February 10, 2022.

During the December 9, 2022, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUAUTOBOOTH (Automatic coating booth) and EUBOOTH1 (Manual spray coating booth)	PTI No. 13-22	iMBranded failed to comply with special conditions of the permit ^β
^β 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.		

iMBranded is advised to obtain Synthetic Minor HAPs limits as explained during the inspection.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 4, 2023 (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.

Jim Whitehead
iMBranded
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Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If iMBranded 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 iMBranded. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Iranna Konanahallii
Senior Environmental Engineer
Air Quality Division
586-596-7630; Konanahallii@Michigan.Gov

cc: Melvin Emel, iMBranded
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Chukuemeka Oje, EGLE