

DEPARTMENT OF ENVIRONMENTAL QUALITY
 AIR QUALITY DIVISION
 ACTIVITY REPORT: Scheduled Inspection

P0992
FY 2019 Sched Insp

P099247710

FACILITY: IMBRANDED		SRN / ID: P0992
LOCATION: 2020 RING ROAD, PONTIAC		DISTRICT: Southeast Michigan
CITY: PONTIAC		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 12/17/2018
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2019 scheduled inspection of iMBranded		
RESOLVED COMPLAINTS:		

iMBranded (P0992)
2020 Ring Road
Pontiac, Michigan 48341

www.iMBranded.com

PTI: Permit-to-Install (PTI) Exemption Rule 336.1287(2)(c). Mostly water-based coatings and sparingly solvent-based coatings are used. As the business grows (50% revenue growth per year in 2017), coating usage could be over 300 gallons (including water) per month per booth.

On December 17, 2018, I conducted a level-2 **FY 2019 scheduled** inspection of iMBranded, located at 2020 Ring Road, Pontiac, Michigan 48341. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994, PA 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Messrs. Tom Schmitt (via phone) (Phone: 248-537-8510; Cell: 248-762-5501; Fax: NA; E-mail: tSchmitt@iMBranded.com), Chief Financial Officer, Joseph Golembiewski (Phone: 248-537-8514- ext. NA; Cell: 586-873-3530; Fax: NA; E-mail: jGolembiewski@iMBranded.com), Chief Financial Officer, and Robert Wilson (Phone: 248-537-8547-ext. 547; Cell: 248-606-0226; Fax: NA; E-mail: rWilson@iMBranded.com), Finishing Manager, assisted me.

The purpose of the scheduled inspection was to inspect a company that has never been inspected by MDEQ-AQD. Also, this inspection is based upon Permit-to-Install (PTI) exemption questions in the Wednesday, May 20, 2018, e-mail from Mr. Tom Schmitt to Ms. Joyce Zhu of AQD.

Founded about 1998, iMBranded builds and installs furniture and fixtures at automotive dealerships, e.g., Audi, Aston Martin, GM, Maserati, etc., using OEM-approved graphic and millwork solutions. About October 2018, iMBranded moved from 2791 Research Dr., Rochester Hills to a former GM facility (Truck Products Center or TPC) at Center Parkway at Pontiac. Center Pkwy. has 90-year history. GM bought 160-acre farmland in 1926. In 1927, Pontiac Central Manufacturing and Assembly Plant began producing medium and heavy-duty trucks and buses. Recently, in 1994, GM built a business campus at old Truck and Bus plant (Pontiac CenterPoint Campus [PCC] Central Office Building, fka Pontiac Central

Manufacturing and Assembly Plant for GM Truck and Bus [A5261]). The GM facility housed engineering employees until 2009 (when government-sponsored and structured bankruptcy occurred using US Treasury's Motors Liquidation Corporation or MLC as bad GM Vs current GM as good GM), when GM moved all its employees to GM Tech Center at Warren. Pontiac Assembly Center (B4031, aka Pontiac East Assembly Plant) produced, until 2009, full-size pickup truck for General Motors. RACER (Revitalizing Auto Communities Environmental Response) Trust, LLC, is a successor to MLC. The pickup truck assembly plant (B4031) was demolished about 2011. iMBranded signed a 10-year lease for \$3-million build-out process. Adjacent, Funuc America Corporation leases 575,000-square-foot manufacturing and distribution facility as an anchor tenant. At this leased facility, iMBranded performs millwork (saw dust emissions) and surface coating (Volatile Organic Compounds or VOC emissions). The process involves: mostly water and sparingly solvent based wipe and spray stains (coatings), ultraviolet (UV) cured and air-dry coatings. The products are designed specifically for cars / trucks dealership environment; not an ordinary office furniture.

TRC Solutions Report

iMBranded hired TRC Solutions (TRCS), an engineering, environmental, etc. consulting company, to perform a review of the coating processes concerning Rule 201, NESHAP / MACT, ROP, PSD, etc. Currently, one automatic and one manual booths, i.e., two booths in all, are used to accomplish coated wood (mostly) surface. TRC Solutions, although it incorrectly recommended Rule 336.1287(2)(c) exemption for the booths, suggested Automatic Booth (not including manual booth) Potential-to-Emit (PTE) of over 100 tons per year of VOC: **Ultracure UV V86FH638 = 32.33** tons per year (0.5 pounds of VOC per gallon of coating and 129,331 gallons per year, 25,866,143 square feet coated surface area, 0.005 gallons per square foot) plus **Walnut Spray Stain = 70.41** tons per year (3.26 pounds of VOC per gallon of coating and 43,196 gallons per year, 25,866,143 square feet coated surface area, 0.00167 gallons per square foot). Furthermore, iMBranded expects to exceed 300 gallons of coatings (with water) usage per booth per month as iMBranded projects its revenue growth to reach \$50 million per year in ensuing 3-4 years.

TRC Solutions recommendation of using Rule 287 exemption for the booths is contradictory to its own PTE calculations (>100 tons of VOC per year). Based upon the TRCS report and rapid business growth (50% per year in 2017), I asked to iMBranded to obtain a NESHAP / MACT Synthetic Minor Permit (PTI).

Millwork

One (1) sliding saw, two (2) table saws are present. Each saw is equipped with a downdraft (combined gravitational and capture velocity forces acting on the particles) saw dust capture system. Each is ducted to one common manifold that leads to two (one large and one small) dust collectors, which use one common dumpster as a hopper. The dust collectors are equipped with bags as filters. While pulse-jet air is used to clean the bags for the large dust collector, shaker mechanism is used for the smaller dust collector.

In addition, routers, Pod and Rail (Busellato) CNC, Edge Bender (Flexa 30 M), Daweler machine (Velox), 3 Flat Bed CNC, 2 wood chippers, etc. are also equipped with capture systems (not downdraft). All these capture systems deliver saw dust contaminants to the same common manifold as well.

The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285

(2)(I).

Coating booths (2) – one automatic and one manual

Automatic booth

One automatic and one manual booths are present. Automatic booth is totally enclosed and is equipped with downdraft filters on two sides of the conveyor. Upon filtration of overspray coating particles, exhaust gases are discharged to outside ambient air. Three (3) drying ovens are present. UV curing ovens are also present. All exhaust gases are discharged to outside ambient air.

Manual booth – Global Finishing Solutions (GFS)

One Global Finishing Solutions (GFS: 15 feet W x 24 feet D x 15 feet H) booth equipped with backdraft filters on two corners is present. Intake filters are present as well for finish quality. A computer (PLC) monitors pressure differential (ΔP) across booth exhaust and intake filters. Upon filtration of overspray coating particles, exhaust gases are discharged to outside ambient air.

Based upon the above arguments, I asked iMBranded to obtain a NESHAP / MACT Synthetic Minor Permit.

Conclusion

I advised iMBranded to obtain a NESHAP / MACT Synthetic Minor Permit. AQD will conduct a follow-up inspection next year.

NAME

Shirley Kernerhall

DATE

02/01/2019

SUPERVISOR

Joyce ZL

