

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: On-site Inspection**

P099266325

<b>FACILITY:</b> IMBRANDED		<b>SRN / ID:</b> P0992
<b>LOCATION:</b> 2020 RING ROAD, PONTIAC		<b>DISTRICT:</b> Warren
<b>CITY:</b> PONTIAC		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b>		<b>ACTIVITY DATE:</b> 12/09/2022
<b>STAFF:</b> Iranna Konanahalli	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b>
<b>SUBJECT:</b> FY 2023 scheduled inspection (on-site) of iMBranded, located at 500 West Long Lake Road, Troy, Michigan 48098-4540.		
<b>RESOLVED COMPLAINTS:</b>		

**IMBranded (P0992)**  
**500 West Long Lake Road**  
**Troy, Michigan 48098-4540**

**www.iMBranded.com**

**Contact:**

1. **Melvin Emel**, Maintenance / Facilities Manager

Phone: 248-537-8584; Cell: 810-351-1206; E-mail: mEmel@iMBranded.com

**Active permit:** Permit-to-Install (PTI) No. **13-22** dated February 10, 2022, for relocating the coating booths from Pontiac (P0992) to Troy (N2528). Rule 702 VOC BACT is no VOC control as controlling emissions using RTO is NOT economically feasible (nearly \$12,000 per ton of VOC controlled using an RTO). PTI No. 13-22, EUAUTOBOOTH, I.1 & EUBOOTH1, I.1 limits: 10.2 & 7.7 tons of VOC per year.

**VN:** AQD issued **Violation Notice (VN)** dated **December 14, 2022:** 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.

On December 09, 2022, I conducted a level-2 **FY 2023 scheduled inspection (on-site)** of iMBranded, located at 500 West Long Lake Road, Troy, Michigan 48098-4540. 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 Environment Great Lakes and Energy, Air Quality Division (EGLE-AQD) administrative rules; and PTI No. 13-22.

During the inspection, **Melvin Emel** (Phone: 248-537-8584; Cell: 810-351-1206; E-mail: mEmel@iMBranded.com), Maintenance / Facilities Manager, assisted me.

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. Again, about March 2021, iMBranded was forced to move from Pontiac to Troy.

### **PTI No. 13-22, Emission Units (EUs)**

Seven (7) woodworking machines that generate saw dust are present: 3 CNC, 1 point-to-point, 1 edge bender, 1 auto saw (Table saw), 1 auto-sander machines. Each machine is equipped with a dedicated saw dust capture device. The captured saw dust is delivered, via common manifolds, to two dust collectors located outside the building. The dust collectors are known as South (Large: 28 10-foot bags) and North (Small: 24 10-foot bags) dust collectors. Pulse-jet mechanism is used to clean dust from the bags: one air pulse every 60 seconds. Thus filtered air is recycled into the building in all seasons as the building is air-conditioned.

Both dust collectors use one common blower in a closed-loop manner to transport captured and collected saw dust to a HOPPER, which is emptied once per week by GFL.

The woodworking machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(2)(I).

In September 2021, Magnus Ndkwe (Phone: 313456-4054), Industrial Hygienist of Michigan Occupational Safety and Health Administration (MIOSHA), LAURA, conducted an inspection and performed air sampling on four employees. Ndkwe found pollutants concentrations of recycled (upon cleaning by two dust collectors) air acceptable.

### **PTI No. 13-22, Special Conditions**

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. AQD issued Violation Notice (VN) dated December 14, 2022.

### **Conclusion**

iMBranded is not in compliance with its permit. AQD issued VN.

NAME *J. S. Pennington*

DATE February 10, 2023

SUPERVISOR *Joyce*