

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

P099271138

FACILITY: IMBRANDED	SRN / ID: P0992
LOCATION: 2020 RING ROAD, PONTIAC	DISTRICT: Warren
CITY: PONTIAC	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 01/05/2024
STAFF: Iranna Konanahalli COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2024 scheduled inspection (on-site) of iMBranded	
RESOLVED COMPLAINTS:	

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

www.iMBranded.com

Contact:

1. **Melvin Emel** (Phone: 248-537-8584; Cell: 810-351-1206; E-mail: mEmel@iMBranded.com) , Maintenance / Facilities Manager
2. **Tony Santellan** (Phone: (248-537-8584; Cell: 978-618-3324; [E-mail: tSantellan@iMBranded.com](mailto:tSantellan@iMBranded.com)) , VP of Manufacturing

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& EUBOOTH1, 1.1 limits: 10.2 & 7.7 tons of VOC per year. EUAUTOBOOTH (automatic coating booth) is permanently shut down and surface coating has been outsourced for economic reasons.

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. This December 2022 VN is now resolved based on FY 2024 inspection. iMBranded started keeping the required records and performing the necessary calculations. iMBranded has removed the elbows from the stacks.

On **January 5, 2024**, I conducted a level-2 **FY 2024 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**, Maintenance / Facilities Manager, assisted me.

Founded about 1998, iMBranded builds and installs furniture and fixtures at automotive dealerships, e.g., Audi, Aston Martin, GM, BM, FCA, Mercedes, VM, 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)

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUAUTOBOOTH	Automatic coating booth using water-based coatings for application to wood, glass, medium-density fiberboard, and veneer. The booth utilizes airless spray applicators.	Mar 2022	NA
EUAUTOBOOTH: the booth has been idled since June 2023			
EUBOOTH1	Manual spray coating booth using water-based coatings for application to wood, glass, medium-density fiberboard, and veneer. The booth utilizes air assisted spray applicators.	Mar 2022	NA
<p>EUBOOTH1: One hand-held manual spray booth is present: Global Finishing Solutions (GFS) Ultra-XD. 25 ft D * 10 ft W * 12 ft H booth with back-draft filter panels on two corners. In the manual booth delicate and small quantity coating is done and most coating was done in previous year (CY2023) in Automatic booth, which is currently (CY 2024) idled (see below). Intake air filter system is present for product quality finish. The booth is equipped with Engate Instrument that can display booth temperature(T)and filter pressure differential (ΔP). An alarm system for high ΔP is present. Upon starting the fan during the inspection of January 05, 2024, $\Delta P = \text{negative } 0.024$ inches of water; Booth T = 76 °F.</p> <p>EUAUTOBOOTH: One automatic coating booth is present: DFJ-1966 Reciprocating Spray Machine. Two coating heads with eight (8) spray guns in all are present. Downdraft exhaust filters for overspray coating particles on both sides of two coating heads (2) are installed.</p> <p>Currently, Automatic coating booth (EUAUTOBOOTH) is still present on site; however, the booth has been idled since June 2023. iMBranded has placed the booth on market for sale. The company has decided to outsource the coating to an outside contractor as outsourcing coating operation is found to be more economical.</p> <p>All coatings are water-based. Solvent-based coatings are not used.</p> <p>Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.</p>			

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 (40 cubic yards capacity), which is emptied **once per week** (1/wk: every Tuesday) by GFL.

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

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

PTI No. 13-22, EUAUTOBOOTH

EUAUTOBOOTH: Automatic coating booth using water-based coatings for application to wood, glass, medium-density fiberboard, and veneer. Airless spray applicators is used in the booth. The booth is equipped with dry filters for overspray paint particles control.

PTI No. 13-22, EUAUTOBOOTH

Manual spray coating booth using water-based coatings for application to wood, glass, medium-density fiberboard, and veneer. The booth utilizes air assisted spray applicators. The booth is equipped with dry filters for overspray paint particles control.

PTI No. 13-22, EUAUTOBOOTH, I

Pollutant	Limit	Time Period / Operating Scenario	Equipment	2023	
1. VOC	7.7 tpy	12-month rolling period as determined at the end of each calendar month	EUBOOTH1	0.56	
2. Diethylene glycol monobutyl ether (CAS No. 112-34-5)	0.46 tpy	12-month rolling period as determined at the end of each calendar month	EUBOOTH1	0.00	
the VOC emissions are substantially less than the limit (e.g., 0.56 << 7.7 tons of VOC per year)					

PTI No. 13-22, EUAUTOBOOTH, II

Material	Equipment	SC	Unit	Limit	CY2023
Primer	EUBOOTH1	SC II.1	gal/yr	338	0
Stain	EUBOOTH1	SC II.2	gal/yr	538	60
Paint	EUBOOTH1	SC II.3	gal/yr	1108	241
Clear Topcoat	EUBOOTH1	SC II.4	gal/yr	1013	385
Solvent (lacquer thinner)	EUBOOTH1	SC II.5	gal/yr	10	0
All annual paint and solvent usage limits are met					

PTI No. 13-22, EUAUTOBOOTH, III-IV

All materials are stored in closed containers, spent filters are handled & disposed of properly. The booth is equipped with exhaust filters and operated properly.

PTI No. 13-22, EUAUTOBOOTH, VI

iMBranded performed the required calculations and kept the required records (daily, monthly, and 12-month period).

PTI No. 13-22, EUAUTOBOOTH, VIII

iMBranded removed an obstruction elbow on the stack (SVBOOTH1: Dia = 35.9 inches Hs = 26.5 feet). Currently, all exhaust gases are discharged unobstructed vertically upwards. December 2022 VN is resolved.

Conclusion

iMBranded is compliance with its permit (PTI No. 13-22). The December 14, 2022, Violation Notice (VN) is resolved.

NAME *J. S. McNamee*

DATE 03/20/2024 SUPERVISOR *Joyce*