



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

**Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Ali's Autobody Plaza, LLC**

1401 Florissant Street
St. Louis, Missouri 63121
FRS# N/A

Inspection Date(s)
March 9, 2022

SIGNATURE
Scott Postma, Inspector, ECAD, Air Branch

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APPENDICES

1. Confidentiality Notice, 1 page
2. Receipt for Documents, 1 page
3. Subpart HHHHHH Checklist, 12 pages
4. Photographs and Photograph Log, 16 pages
5. Notification, Ali Alrashedi Certification, Spray Gun, and Booth Information, 19 pages
6. Spray Booth User Manual, 64 pages.

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

Due to an odor complaint and EPA's national compliance initiative for Creating Cleaner Air for Communities focused on hazardous air pollutants (HAPs), a full compliance evaluation was conducted to determine compliance at Alu Autobody Plaza, LLC (hereinafter referred to as Ali or facility) with the Clean Air Act.

Table 1 lists the inspection team members.

Table 1. INSPECTION TEAM MEMBERS	
Name, Title	Affiliation
Scott Postma	EPA, Region 7, ECAD, Air Branch

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 1. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Ali Alrashedi, Owner	(314) 629-3950	ali.autobody21@gmail.com
Khaled Al Qaissy, Painter/labor	Same	Same

FACILITY OVERVIEW

As an area source of HAP's, Ali's is not required to have a Title V permit from the Missouri Department of Natural Resources. Ali's is subject to the following regulations and standards listed in Table 3. Ali's was previously under the different ownership. The name was changed to Ali's Autobody Plaza at the time of purchase on September 1, 2021.

Ali's has no prior enforcement history.

Table 3 lists the regulations and standards

Table 3. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR, Part 63	Subpart A, General Provisions
40 CFR, Part 63	Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

FACILITY OPERATIONS SUMMARY

Ali's is an automotive body repair and painting facility. Ali's does not do any chemical paint stripping. The facility consists of an automotive body repair and paint preparation area and a painting area in the back portion of the building.

Automotive painting is conducted in their Accudraft self-contained booth. The booth is approximately 25 feet long by 14 feet wide. The paint booth is designed with an outlet filter certified to have a collection efficiency that exceeds the requirements (see Appendix 5, Page 14). The booth has two fans to maintain the pressure per the requirements of 40 CFR, Part 63, Subpart HHHHHH. Ali's personnel were only repairing vehicles at the time of the inspection. The Ali's paint booth was not operating during the inspection because no cars or parts were being painted at that time.

Establishments involved in paint stripping and automotive painting have a Standard Industrial Classification (SIC) number 7532 and a North American Industrial Classification System (NAICS) number 81121. Ali's typically operates 8-10 hours per day, five days per week and currently employs three people.

FIELD ACTIVITIES SUMMARY

I arrived in St. Louis, Missouri on March 9, 2022, to inspect the facility at 1401 Florissant Road. I conducted a drive-by, visual observation of the Ali's Autobody Plaza (Ali's) facility in St. Louis, Missouri on the morning of March 9, 2022, with no findings. After taking photographs of the exterior of the building, I arrived at the Ali's facility's front entrance at approximately 10 a.m. I entered the facility and was greeted by Ali Alrashedi. Mr. Alrashedi escorted me to his desk. I presented my credentials to Mr. Alrashedi and explained the statutory authority and purpose of the inspection. I informed Mr. Alrashedi that a Confidentiality Notice would be provided for him to make a confidential business information claim if necessary (Appendix 1). Mr. Alrashedi was provided a Receipt for Documents and Samples form (Appendix 2). After some initial general discussion of the processes used at Ali's and the facility layout, we reviewed the 40 CFR, Part 63, Subpart HHHHHH requirements. No painting was occurring at the time of the inspection.

Mr. Alrashedi provided a facility tour. During our tour and our discussions, I completed my Subpart HHHHHH checklist (Appendix 3). I took pictures during the facility tour (see Appendix 4). All photographs were taken on March 9, 2022). Mr. Alrashedi showed me the repair area and the paint booth.

During the tour, I observed that booth operating and the pressure device (measured in millimeter water column) was near zero of water column (see Photograph 7, Appendix 4). The observed pressure was within the Subpart HHHHHH specification. Mr. Alrashedi showed me that the outlet filters, inside the duct, were in-place and had a coating of material (see the Photographs 8 and 9, Appendix 4).

I requested the paint usage and solvent disposal record, safety data sheets (SDS), painter certification, paint booth specification, paint gun specifications, and filter material specifications. The paint gun certification was provided on site during the inspection. The training certifications for Mr. Alrashedi were provided by Mr. Alrashedi via electronic mail on March 11, 2022 (see Appendix 5). I reviewed the most recent documents provided by Mr. Alrashedi. coat. The filter efficiency certificate can be found in Appendix 5. I also asked Mr. Alrashedi about Ali's

methylene chloride usage records. Mr. Alrashedi informed me that the facility does not use any methylene chloride or any paint stripping materials.

At the conclusion of the inspection, I conducted an exit interview with Mr. Alrashedi. I explained my initial observations. I provided Mr. Alrashedi with a copy of the Confidentiality Notice (Appendix 1) and a Receipt for Documents and Samples (Appendix 2). Mr. Alrashedi signed the Confidentiality Notice. No claim of confidentiality was made.

I conducted a closing meeting and left the facility at about noon.

AREA/DOCUMENTS INSPECTED/REVIEWED

I reviewed the condition of the paint booth, the operating status, and any required record keeping for the equipment.

Subpart HHHHHH requires facilities to maintain records for the painter training certification, paint gun specifications, and filter material specifications. Mr. Alrashedi provided records of the paint gun certification, and filter material. Mr. Alrashedi provided the painter training certifications following the inspection, on March 15, 2022 (Appendix 5).

I spoke with Ali's paint vendor (i.e. Axalta Coating Systems) on the phone who said that that the contents of their paint (CROMAX) does not contain HAPS. I observed that their website advertises that their CROMAX paints do not contain HAPS are contained in their paint.

Observations are noted in the **Investigation Observation and Potential Findings** section below.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Site conditions and activities are documented in the inspection checklist (Appendix 3). The field photographs are attached as Appendix 4. I made the following observations and discussed all observations with Mr. Alrashedi during the closeout meeting. These observations are not final compliance determinations. EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

I observed and Mr. Alrashdi reported to me that the paint booth filter had been installed and was functional.

I observed a coating of collected emissions particulate on the paint booth filter material (Appendix 4).

No emissions were observed exiting the roof of the paint booth.

I observed that Ali's had two paint guns in use. 40 CFR Part 63, Subpart HHHHHH requires paint gun certifications and Ali's is required to maintain a copy of the certifications. Mr. Alrashedi said that the paint guns were manufactured by SATA. Mr. Alrashedi provided copies of the paint gun certifications (Appendix 5). Both paint guns were certified as high volume-low pressure (HVLP). Both paint guns meet the Subpart HHHHHH requirements. The paint gun documents were received on March 14, 2022 (Page 5, Appendix 5).

Records were received by e-mail following the inspection: The initial Notification was completed after the inspection and was received on March 24, 2022 (Pages 1 to 4, Appendix 5).

The painter training was completed on March 14, 2022. The painter training documents were received by e-mail on March 15, 2022 (Pages 6 to 8, Appendix 5).

The paint booth specification documents (Pages 9 to 12, Appendix 5) were received by e-mail and at the time of the inspection.

Records that were requested but were not received include the following: safety data sheets for the paints, primer and clear coats, paint purchase and waste disposal records. Ali's completed the initial notification after the inspection. The paint Ali's purchased do not contain any HAPS.

Observation 1: Painter Training Certification
Observation Summary: Ali Alrashedi and Khaled Al Qaissy did not provide a copy of his training. Mr. Alrashedi said that they had not taken the raining. Training certificate(s) were completed and provided following the inspection for Mr. Alrashedi.
Citation: 40 CFR, Part 63, Subpart 6H (63.11173 (e)(1))
Evidence: No painter certification provided that was dated prior to the inspection (See Appendix 5).
Description of Observation: At the time of the inspection, no individual had documentation of completing the required training. Mr. Alrashedi's training was completed after the inspection (Appendix 5). Mr. Alrashedi electronically mailed the initial notification and painter certifications, completed after the inspection, on March 15, 2022 (Appendix 5).

Observation 2: Initial Notification or annual Notification of change was not submitted prior to the inspection by the current owner or operator.
Observation Summary: The facility did not produce a notification of compliance status or annual notification of change report. An Initial Notification was submitted following the inspection (Appendix 5).
Citation: 40 CFR, Part 63, Subpart 6H (63.11175 (b)) and 63.11176 (a))
Evidence: No Initial Notification, Notification of Compliance Status, or Change Report were provided.
Description of Observation: The facility is required to submit an Initial and/or change notification. Mr. Alrashedi purchased and began operating the facility on or about September 1, 2021. Ali's did not submit a change notification. Mr. Alrashedi did complete an Initial Notification following the inspection (Appendix 5).