



## REGION 3

PHILADELPHIA, PA 19103

**Report Title:** Clean Air Act Inspection of Roger Auto Collision  
**Inspection Date(s):** December 6, 2023  
**Regulatory Program(s):** NESHAP, SIP  
  
**Company Name:** Same as below  
**Facility Name:** Roger Auto Collision  
**Facility Location:** 1810 Edwin St. NE,  
Washington, DC 20018  
  
**Latitude:** 38.9197 **Longitude:** -76.9781  
**County/Parish:** District of Columbia  
  
**AFS/ICIS-Air Number:** 03000DC00002  
**Permit Number:** N/A  
**NAICS Code:** 811121 **SIC:** 7532  
**DSBID #:** ECAD-5368

**Facility Representatives:** **Point of Contact** ☒  
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**EPA Inspectors:**  
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Carly Joseph, Inspector, 3ED21  
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**State/Local Inspectors:**  
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**EPA Lead Inspector**

**Signature**

**Dean Deluca**

**Date**

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**Supervisor**

**Signature**

**Kristen Hall**

**Date**

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## **I. Introduction**

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Roger Auto Collision (Roger or Facility) to verify compliance with applicable Local, State, and Federal regulations. The Department of Energy and Environment (DOEE) was notified of the inspection on November 20, 2023, via email. The Facility was not notified of the inspection.

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A. Summary of the Facility.

### **A. Summary of the Facility**

The Facility is located at 1810 Edwin St. NE, Washington, DC 20018. The Facility is a mechanical and an auto body shop. They conduct mechanical repairs to vehicles such as engine work and maintenance work such as oil changes. After a vehicle or vehicle part is prepared to be painted, the Facility conducts spray-applied painting operations by using a paint spray gun in a spray booth. The Facility does not conduct any chemical stripping using methylene chloride or any other chemicals.

The Facility has not received an air permit from DOEE.

Roger Auto Collision is classified as a minor source for HAPs and all other air pollutants. The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR Part 63 Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (NESHAP 6H)

### **B. Inspection Opening Conference**

At 11:46 AM on December 6, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Roger Auto Collision was represented by Roger Reyes. Also, Kush Kharod from DOEE was present. EPA inspectors, Dean DeLuca and Carly Joseph, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the Facility representatives of their right to claim any confidential business information (CBI). At that time, Roger did not claim any photos or documentation as CBI and the Facility accompanied EPA during the inspection.

## **II. Site Activity/Process Description**

Mr. Reyes stated that Roger Auto Collision is a new business with the only employees being Roger and his father. The Facility operates in bays #5 and #6 at the rear left of 1810 Edwin St. and is typically open from 9AM-5PM on Monday-Friday. The location used to be operated by Dove Cab until approximately six months ago. The Facility stated they rent the space from Mr. Gupta and the paint spray booth came with the rental and is also owned by Mr. Gupta. Roger stated he has been working at this location for a while but has only recently taken ownership and started his own company. As part of this discussion, he stated the booth has been in this location for many years.

The Facility indicated they only paint in the paint booth and painting/body work is their primary business. They stated they purchase their paints from Pro Colors on Rhode Island Avenue. On occasion they will do some welding, but it is not their primary business. Roger also explained they do not need a cold cleaning machine or degreaser because the parts are clean when they arrive.

The opening conference concluded at 11:59AM.

## **III. Observations**

EPA inspectors were led on a walkthrough of the Facility at 12:00PM by Roger Reyes of Roger Auto Collision and Kush Kharod of DOEE was also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 1). A light snow started during the inspection with a temperature in the low 40's.

The Facility consists of the two bays which includes a single spray booth. The main doors to the spray booth are in bay #5 but there is a pedestrian door from bay #6. The inspection team entered the spray booth and observed a truck inside the booth. The exhaust filters were located opposite the vehicle entry indicating a crossdraft spray booth. There were multiple exhaust locations which were missing exhaust filters. Some of the filters were heavily laden with dirt and dust which could potentially decrease airflow. The filters present in the booth during the inspection were AAF Flanders EZ Flow 20"x20"x1" filters with markings saying they should be changed every 30 days.

Also located near the exhaust and opposite the paint booth vehicle doors was the paint storage area and an Anest Iwata WS400 Evo spray gun. There was a multitude of different paints and liquids located in this area of the spray booth. Roger stated these are nearly all leftover from the prior business owner. He stated the materials were left because the prior owner was evicted, which is how Roger was able to start his business at the location. Roger explained how other painters don't like the water-based paints, but he prefers to use them. Roger stated his business purchases the water-based paint line from Wandabase and showed the inspection team one of these cans. There were also Limco and R & M paint cans observed in this area.

The inspection team then asked the Facility to turn on the spray booth to see how the air flows through the booth. With the spray booth turned on, airflow was observed to be entering the booth through the openings in the door and leaving through the exhaust area indicating a negative airflow.

The walkthrough concluded at 12:19PM.

#### **IV. Closing Conference**

EPA inspectors, Roger Reyes, and Kush Kharod from DOEE had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is ongoing, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within 60 days, with a copy to the DOEE. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 12:23PM.

The following have been identified as potential issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by Roger Auto Collision.

- During the inspection, the Facility did not provide any documentation showing their painters are certified as required in NESHAP 6H.
- During the inspection, the Facility did not provide any documentation showing their filter technology achieved at least 98% capture of the paint overspray.
- EPA will review the paint spray guns observed at the Facility to determine if all spray guns are high volume low pressure (HVLP), electrostatic application, airless, air-assisted airless, or an equivalent technology.
- During the inspection, the Facility did not demonstrate their spray guns were cleaned in such a way that an atomized mist or spray was not created outside of a closed container to collect the spray gun cleaning solvent.
- During the inspection, the Facility did not demonstrate that any records were being maintained as required in NESHAP 6H.

#### **V. List of Attachments**

Attachment 1: Photo Log

# Attachment 1:

# PHOTO LOG

Facility: Roger Auto Collision

Location: 1810 Edwin St. NE, Washington, DC 20018

Inspection Date: December 6, 2023

EPA Inspector(s): Dean DeLuca and Carly Joseph

Photographer: Carly Joseph



Photo Number: 73

Photo Description: Spray booth from right bay (bay #6)



Photo Number: 74

Photo Description: Spray booth from left bay (bay #5)



Photo Number: 75

Photo Description: Front left of spray booth with paint storage



Photo Number: 76

Photo Description: Front right of spray booth



Photo Number: 77

Photo Description: Spray booth entry



Photo Number: 78

Photo Description: Spray booth filters



Photo Number: 79

Photo Description: Water-based paint can