



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of Big Jones Auto Repairs
Inspection Date(s): December 5, 2023
Regulatory Program(s): NESHAP, SIP

Company Name: Same as below
Facility Name: Big Jones Auto Repairs
Facility Location: 1851 Adams St. NE,
Washington, DC 20018

Latitude: 38.9199 **Longitude:** -76.9777
County/Parish: District of Columbia

AFS/ICIS-Air Number: 03000DC00005
Permit Number: N/A
NAICS Code: 811121 **SIC:** 7532
DSBID #: ECAD-5367

Facility Representatives: **Point of Contact**
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EPA 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 Big Jones Auto Repairs (Jones 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 1851 Adams 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. In addition, they sand vehicles and conduct other preparatory work to prepare vehicles to be painted. After a vehicle or vehicle part is prepared, the Facility also conducts spray-applied painting operations using a paint spray gun inside an enclosed spray booth located in the Facility's garage on the left side of the building. 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.

Big Jones Auto Repairs 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)
- 40 CFR Part 63 Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants: Nine Metal Fabrication and Finishing Source Categories

B. Inspection Opening Conference

At 12:50PM on December 5, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Jones was represented by Jones Baafi. Also, Jacob Zangrilli and Nelson Martinez from DOEE were 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, Jones

did not claim any photos or documentation as CBI and the Facility accompanied EPA during the inspection.

II. Site Activity/Process Description

The Facility stated they started operations in 2011. They conduct both autobody work and painting but do not use Methylene Chloride or any other chemical paint strippers. They stated they do a minimal amount of welding. The only employees are Jones Baafi and his brother. They purchase paint from the paint shop on Rhode Island Avenue, but he could not remember the name of the company. This Facility is located in the same building as Y & G Auto Repair without a specific line between the two businesses, but Big Jones Auto Repairs is a different business.

The opening conference concluded at 12:53PM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 12:53PM by Jones Baafi of Jones and Jacob Zangrilli and Nelson Martinez of DOEE were also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 1).

During the inspection, there was a vehicle part located on a stand in the crossdraft paint booth. The team observed a stack inside the enclosed paint booth that vents to the atmosphere. Viledon Freudenberg air filters were located on the vehicle door to the paint booth. There was a small amount of odor observed in the paint booth indicating painting had recently occurred. There were two filter panels missing on the exhaust side of the paint booth and all exhaust filters looked to be heavily covered in dirt, dust, or paint overspray which could hinder airflow. Jones stated the filters are changed every couple of months.

There were three spray paint guns were observed at the Facility: Devilbiss GTi; Binks 2001; and Devilbiss DV1. The Facility said they used to use HVLP spray guns but didn't like them.

The inspection team then asked the Facility to turn on the spray booth to see how the air flows through the booth. Air was being drawn into the spray booth at the vehicle doors, but there was minimal power drawing air out through the exhaust.

The walkthrough concluded at 1:06PM.

IV. Closing Conference

EPA inspectors, Jones Baafi, Jacob Zangrilli, and Nelson Martinez had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, 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 State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 1:13PM.

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 Jones.

- 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.
- During the inspection, the spray booth demonstrated that it was ventilated at a negative pressure by drawing air into the spray booth but did not demonstrate that all air was exhausting the booth through the filters.
- 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

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PHOTO LOG

Facility: Big Jones Auto Repairs

Location: 1851 Adams St. NE, Washington, DC 20018

Inspection Date: December 5, 2023

EPA Inspector(s): Carly Joseph and Dean DeLuca

Photographer: Dean DeLuca



Photo Number: 34

Photo Description: Exterior of Big Jones Auto Repairs



Photo Number: 35

Photo Description: Exterior of paint booth



Photo Number: 36

Photo Description: Interior of paint booth



Photo Number: 37

Photo Description: Devilbiss spray gun



2023/12/05 13:05

Photo Number: 38

Photo Description: Interior of Big Jones Auto Repairs