



REGION 3

PHILADELPHIA, PA 19103

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

Company Name: Advance Auto Service
Facility Name: Same as above
Facility Location: 1850 Adams Street NE,
Washington, DC 20018
Latitude: 36.01601848 **Longitude:** -76.97835
County/Parish: District of Columbia

AFS/ICIS-Air Number: 03000DC00012
Permit Number: N/A
NAICS Code: 811111, 811121 **SIC:** 7532
DSBID #: ECAD-78

Facility Representatives: **Point of Contact**
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EPA Inspectors:
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State/Local Inspectors:
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EPA Lead Inspector

Signature

Carly Joseph

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 Advance Auto Service (Advance Auto 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 1850 Adams Street NE, Washington, DC 20018. The Facility is an auto body shop that also offers general maintenance, mechanical work, and electrical work. In addition, they sand, grind, and weld vehicles and conduct other preparatory work to prepare vehicles to be painted. After a vehicle or vehicle part is prepared, 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 currently does not have any federal or state air permits. The Facility had a D.C State operating permit, Permit #6851, issued September 3, 2014. 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 2:10 PM on December 5, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Advance Auto Service was represented by Owner, Asfaw Woldegebriel. 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, Advance Auto did not claim any photos or documentation as CBI and the Facility accompanied EPA during the inspection.

II. Site Activity/Process Description

Advance Auto began operation in 2011. Asfaw Woldegebriel is the business Owner and rents the property. Advance Auto's hours of operation are 9AM-6PM from Monday-Saturday. The Facility performs mechanical work, electrical work, auto body work, and general maintenance. Advance Auto consist of an enclosed spray booth where the Facility paints parts of cars. The Facility also owns and operates sanding machines, grinders, and an acetylene oxygen mix welding machine for auto body work repairs.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 2:15 by Asfaw Woldegebriel of Advance Auto 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).

The inspection team began its walkthrough in the Facility's parking lot which was in front of the garage and could hold up to four to six vehicles. There were four vehicles parked in the parking lot during the time of the inspection. The garage was a single bay with two cars on two lifts receiving maintenance work and one car parked in between the bay and parking lot awaiting service. The inspection team entered the garage and observed a Chicago Electric Welding 90-amp flux welder. An acetylene oxygen mix welder is also used at the Facility. Mr. Woldegebriel indicated Advance Auto conducts sanding, grinding, and some welding during body work repair.

Mr. Woldegebriel led the inspection team to observe the Facility's enclosed paint booth. Light bulbs were missing from the light fixtures, some of the paint booth filters were heavily laden with dirt, dust, or paint overspray, and there was a gap in the filters observed where the exhaust exits the paint booth. Mr. Deluca asked Mr. Woldegebriel to turn on the paint booth so that the inspection team could observe the paint booth during operation. The air was observed coming in through the front of the booth but did not appear to exit through the filters when exiting the exhaust stack. Advance Auto uses 20" x 25" 300 series filters made by Air Filtration Co. Inc. Mr. Woldegebriel, stated the Facility changes it's filters every two months and does not perform a lot of paint jobs. The Facility mostly does auto repair work. Advance Auto employs one painter, Castolo Perez. Mr. Woldegebriel stated the painter does not have a paint certificate. Castolo Perez, explained that he cleans the spray guns over a hazardous waste drum by pouring economy thinner through the spray gun. Crystal Clean is an environmental service that the Facility uses to discard of its hazardous waste offsite from the parts degreaser, waste oil, anti-freeze, and paint waste.

Next, the inspection team observed the paint storage area. Mr. Woldegebriel, explained that Advance Auto purchases paint from Paint Supply located in Brentwood, MD. The team observed the following paint colors: BMW gray, Toyota cobalt, Toyota Camry gray, Toyota red, and more. Lastly, the inspection

team observed Advance Auto's spray guns. The inspection team noted the following spray guns; an Anest Iwata and a Pininfarina; and the Facility stated they were air-assisted.

The walkthrough concluded at 2:55PM.

V. Closing Conference

EPA inspectors, Asfaw Woldegebriel, 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 in 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 3:00PM.

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 Advance Auto.

- 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 and exhaust filters were missing in the spray booth.
- During the inspection, the spray booth demonstrated that it was ventilated at a negative pressure by drawing air into the spray booth, but it was not observed leaving 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.

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VI. List of Attachments

Attachment 1: Photo Log

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PHOTO LOG

Facility: Advance Auto Service

Location: 1850 Adams St. NE, Washington, DC 20018

Inspection Date: December 5, 2023

EPA Inspector(s): Carly Joseph and Dean DeLuca

Photographer: Dean DeLuca

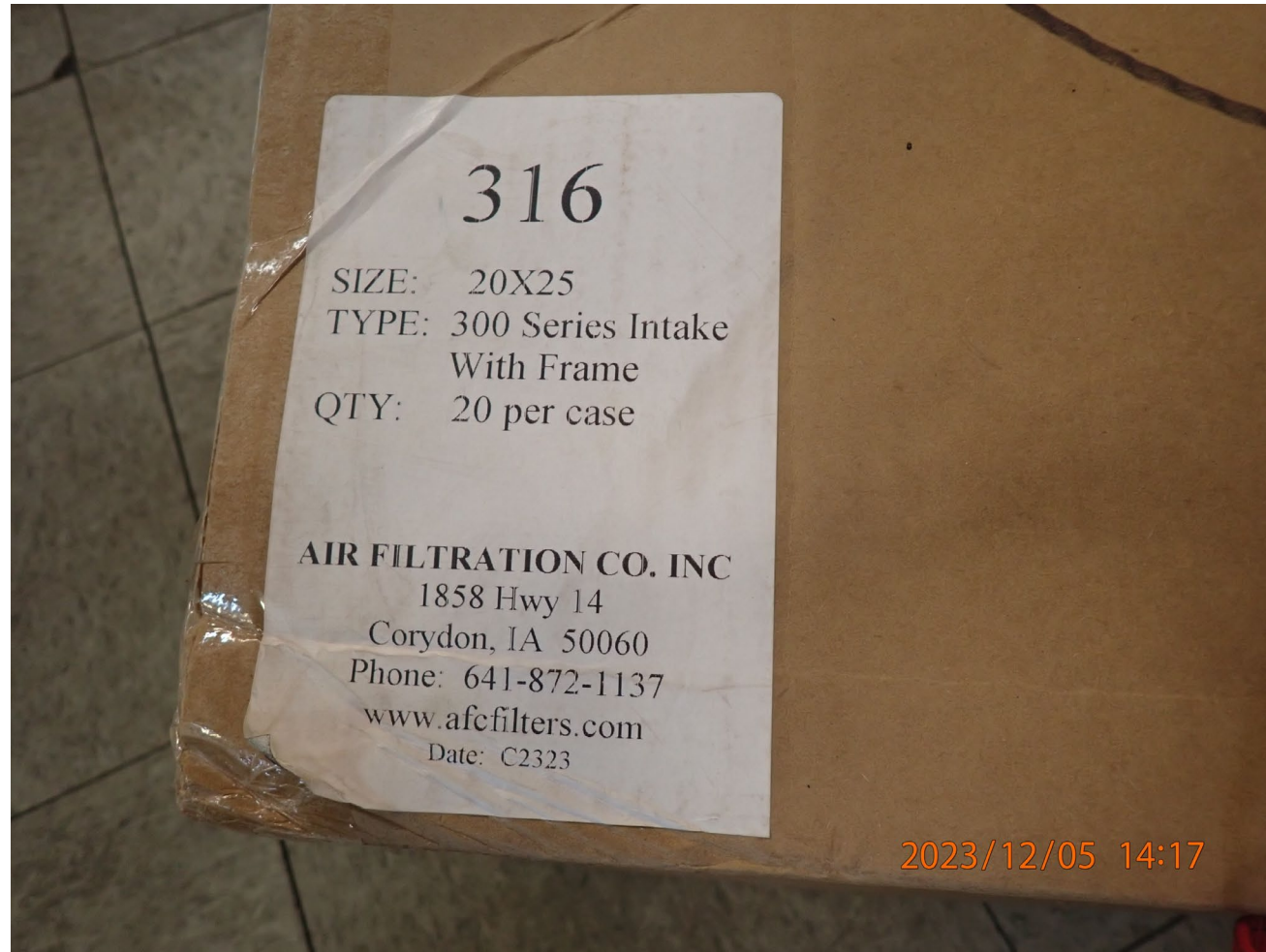


Photo Number: 39

Photo Description: Air Filters Box Label for Paint Booth



Photo Number: 40

Photo Description: Exterior of Paint Booth



Photo Number: 41

Photo Description: Interior of Paint Booth



Photo Number: 42

Photo Description: Interior of Paint Booth



Photo Number: 43

Photo Description: Paint Shop Supply Paint Label's



Photo Number: 45

Photo Description: Interior of Paint Booth



Photo Number: 46

Photo Description: Chicago Electric Welder

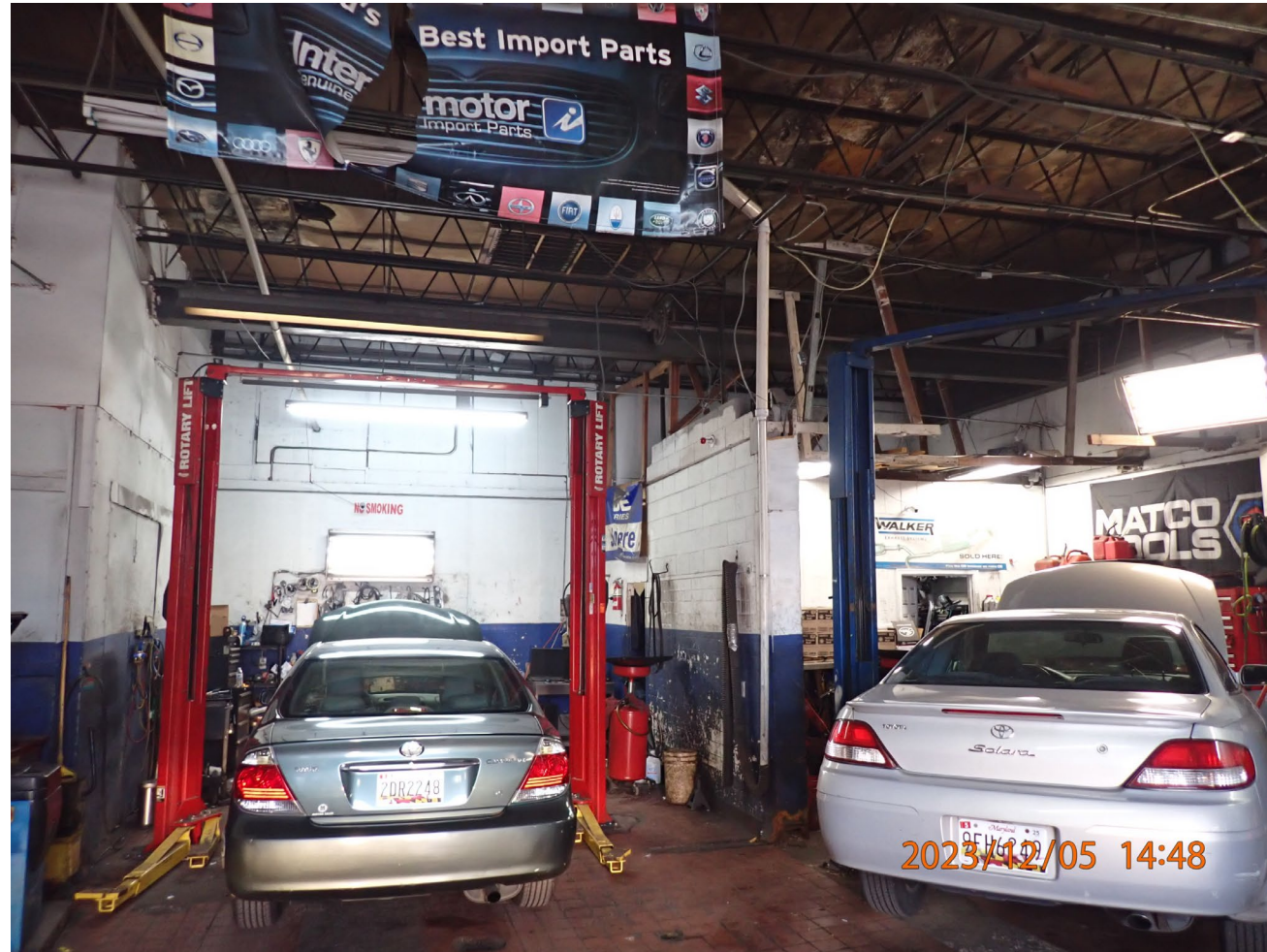


Photo Number: 47

Photo Description: Interior of Garage



Photo Number: 48

Photo Description: Exterior of Advance Auto Service Garage