



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of Capital Benz Auto Service
Inspection Date(s): 12/06/2023
Regulatory Program(s): NESHAP, SIP

Company Name: Capital Benz Auto Service
Facility Name: Same as above
Facility Location: 1801 Adams Street NE
Washington, D.C. 20018
Latitude: 38.92023 **Longitude:** -76.97847
County/Parish: District of Columbia

AFS/ICIS-Air Number: 03000DC00007
Permit Number: N/A
NAICS Code: 811111, 811121 **SIC:** 7538
DSBID #: ECAD-79

Facility Representatives: **Point of Contact**

Desalegn Zeleke, Manager

Phone: 202-560-5889

Email: Capitalbenz1801@gmail.com



EPA Inspectors:

Carly Joseph, Air Inspector, 3ED21

Phone: 215-814-2127

Email: Joseph.Carly@epa.gov

Dean DeLuca, Physical Scientist, 3ED21

Phone: 304-234-0264

Email: DeLuca.Dean@epa.gov

State/Local Inspectors:

Kush Kharod, DOEE

Phone: 202-924-5647

Email: Kush.Kharod@dc.gov

EPA Lead Inspector

Signature

Carly Joseph

Date

701 Mapes Road

Fort Meade, MD 20755-5350

Supervisor

Signature

Kristen Hall

Date

Table of Contents

I. Introduction	3
A. Summary of the Facility.....	3
B. Inspection Opening Conference.....	3
II. Site Activity/Process Description	3
III. Observations	4
IV. Closing Conference	4
V. List of Attachments	6

I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Capital Benz Auto Service (Capital Benz or Facility) to verify compliance with applicable State and Federal regulations. The Department of Energy and Environment (DOEE) was notified of the inspection on November 20, 2023 via email.

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 1801 Adams St. NE, Washington, DC 20018. Capital Benz performs general maintenance and mechanical work on cars. The Facility specializes in all Mercedes Benz vehicles and quality service.

The Facility does not have any federal or state air permits. 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 10:37 AM on December 6, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Capital Benz was represented by Manager, Desalegn Zeleke. Also, Kush Kharod from DOEE was present. EPA inspectors, Carly Joseph and Dean DeLuca, 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, Desalegn Zeleke did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

Customer Service Representative, Samrawit Haite, of Capital Benz greeted inspectors upon arrival and explained the manager, Desalegn Zeleke, would assist us shortly. Mrs. Haite stated she's worked at Capital Benz for the past two years. Desalegn Zeleke stated that the Facility has been operating at its current location for approximately eight years. Capital Benz has three full time employees and a contracted painter. Mr. Zeleke explained that he's been renting the property from Mr. Gupta since

2017. Mr. Gupta owns the enclosed paint booth. The Facility's hours of operation are 8am-6pm Monday through Friday and Saturday's 8am- 2pm.

Capital Benz consists of a single building with a two-bay garage, three lifts, and an enclosed paint booth that vents to the atmosphere. Capital Benz performs mechanical work and general maintenance on cars with the services offered including tune-ups, engine repair, transmission, suspension, and more. Ms. Joseph inquired whether the Facility conducts paint stripping utilizing methylene chloride. Mr. Zeleke indicated that Capital Benz does not conduct any chemical paint stripping. The Facility conducts sanding to prepare a vehicle for painting. Mr. Zeleke explained that sometimes Capital Benz takes vehicles across the street for painting and minor painting is conducted in the bay of the Facility.

III. Observations

EPA inspectors were led on a walkthrough of the Facility by Desalegn Zeleke of Capital Benz and Kush Kharod from DOEE was also present for the walkthrough. EPA inspectors noted Dean DeLuca would take photos during the Facility walkthrough (Attachment 1).

The inspection team entered the garage through the bay and observed five cars in one bay receiving maintenance. The inspection team walked through the garage and observed a pile of engines and a separate pile of three transmissions. Mr. Zeleke indicated the Facility removes engines and transmissions and replaces them with new ones. The team observed a Safety Kleen parts cleaner inside the bay. Mr. Zeleke led the inspection team to the enclosed paint booth.

The inspection team entered the paint booth that contained a white vehicle inside. The filters were located on the top of the paint booth and on bottom lower side walls of the paint booth. The observed filters were heavily laden with dirt, dust, or paint overspray. Mr. Deluca requested that Mr. Zeleke turn on the paint so the inspection team could observe how the paint booth operates. Some air could be felt going into the paint booth through the vehicle door. However, the airflow of the booth was unable to demonstrate that the booth was operating under negative pressure.

The inspection team exited the paint booth and observed the outside of the booth. The enclosed paint booth had two stacks on top that vent to the atmosphere. Mr. Zeleke stated the Facility paints about one car a month and changes the filters 1-2 times a year. Next, the inspection team observed the Facility's paint storage area. Mr. Zeleke stated Capital Benz purchases paint from Paint Shop Supply and Paisanos Auto Supply. Mr. Zeleke also explained that the Facility's painter is a contractor and he's unsure if the painter has any certifications. The inspections team observed Capital Benz's spray guns which included: six HVLP spray guns, one SATA KLC spray gun, and one Devilbiss Pro Lite spray gun.

IV. Closing Conference

After the walkthrough, EPA inspectors, Desalegn Zeleke, and Kush Kharod had a brief closing conference to ask additional questions and discuss observations. Mr. Zeleke allowed the inspection team to observe a record of the Facility's hazardous waste offsite shipment generated from the

Facility's Safety Kleen parts washer. 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 DOEE. The inspection concluded at 11:34 AM.

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 Capital Benz.

- 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 did not demonstrate that it was ventilated at a negative pressure and drawing air into the spray booth.
- 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 that any records were being maintained as required in NESHAP 6H.

DSBID #: ECAD-79

V. List of Attachments

Attachment 1: Photo Log

Attachment 1:

PHOTO LOG

Facility: Capital Benz Auto Service

Location: 1801 Adams Street NE, Washington, DC 20018

Inspection Date: December 6, 2023

EPA Inspector(s): Carly Joseph and Dean DeLuca

Photographer: Dean DeLuca



Photo Number: 58

Photo Description: Exterior of Capital Benz Auto Service



Photo Number: 59

Photo Description: Interior of Garage

Capital Benz Auto Service, December 6, 2023



Photo Number: 60

Photo Description: Exterior of paint booth

Capital Benz Auto Service, December 6, 2023



Photo Number: 61

Photo Description: Safety Kleen Parts Cleaner



Photo Number: 62

Photo Description: Interior of paint booth



Photo Number: 63

Photo Description: Interior of paint booth



Photo Number: 64

Photo Description: Top of paint booth



Photo Number: 65

Photo Description: storage area behind the paint booth



Photo Number: 66

Photo Description: interior of paint booth



Photo Number: 67

Photo Description: paint storage area



Photo Number: 68

Photo Description: stack on top of paint booth

PAGE 1

SAFETY-KLEEN
LDR NOTIFICATION FORM

08/13/2023 PAGE: 1
06:17:52

PLANT: AVA
GENERATOR NAME: Capital Benz Auto

MANIFEST NO.: 240684326 SK
OR SALES SERVICE NO.: 92561799
CUST#: CA63776

SK Shipping #: 240684326
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO: 1 MANIFEST PAGE/LINE# 01/001 SKPRFL NO: 150055
SKDOT#: 0000717

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D039

Treatability group: NWW Non-Wastewater
Waste Constituent Notification:

Legend

Number	Constituent
57	BENZENE
29	TETRACHLOROETHYLENE
37	TRICHLOROETHYLENE
50	CADMIUM
55	LEAD
57	MERCURY - ALL OTHERS
260	SILVER

2023/12/06 11:23

Photo Number: 69

Photo Description: Hazardous waste removal record

LDR FORM LINE NO: 1 MANIFEST PAGE/LINE# 01/001 SKPRFL NO: 150055
SKDOT#: 0000717

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D039

Treatability group: NWW Non-Wastewater

Waste Constituent Notification:
Legend

Number	Constituent
67	BENZENE
339	TETRACHLOROETHYLENE
337	TRICHLOROETHYLENE
50	CADMIUM
55	LEAD
57	MERCURY - ALL OTHERS
60	SILVER

2023/12/06 11:23

Photo Number: 70

Photo Description: Hazardous waste removal record