



### REGION 3

PHILADELPHIA, PA 19103

**Report Title:** Clean Air Act Inspection of Collision Auto Clinic  
**Inspection Date(s):** December 5, 2023  
**Regulatory Program(s):** NESHAP  
  
**Company Name:** Same as below  
**Facility Name:** Collision Auto Clinic  
**Facility Location:** 2206 Lawrence Avenue NE,  
Washington, DC 20018  
  
**Latitude:** 38.9195 **Longitude:** -76.9778  
**County/Parish:** District of Columbia  
  
**AFS/ICIS-Air Number:** 03000DC00010  
**Permit Number:** N/A  
**NAICS Code:** 811121 **SIC:** 7532  
**DSBID #:** ECAD-5371

**Facility Representatives:** **Point of Contact**  
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|                           |                                                            |             |
|---------------------------|------------------------------------------------------------|-------------|
| <b>EPA Lead Inspector</b> |                                                            |             |
| <b>Signature</b>          | <b>Dean Deluca</b>                                         | <b>Date</b> |
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| <b>Supervisor</b>         |                                                            |             |
| <b>Signature</b>          | <b>Kristen Hall</b>                                        | <b>Date</b> |

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## **I. Introduction**

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Collision Auto Clinic (Collision 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 2206 Lawrence Avenue 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 by using paint spray guns. 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.

Collision Auto Clinic 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 9:46AM on December 5, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Collision Auto Clinic was represented by Benjamin Romero. 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. Although Benjamin Romero was able to speak and understand English, English was his second language and Spanish was his first language. Spanish was fluently spoken by Nelson Martinez from DOEE. There were times during this inspection where Nelson acted as a translator between the Facility and the inspection team. Additionally, EPA informed the facility representatives of their right to claim any confidential

business information (CBI). At that time, Collision did not claim any photos or documentation as CBI and the Facility accompanied EPA during the inspection.

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

Benjamin Romero is the business owner, and he has operated at location for a little less than twenty years. He does not have any other employees. Typical hours of operation were 9AM-5PM on Monday-Friday, and 9AM-12PM on Saturday. The Facility does both mechanical work and car painting. He does not have a spray booth, but instead paints in the open garage. He stated some of the paint guns on-site are just used for parts. Collision does not do chemical paint stripping using Methylene Chloride.

The opening conference concluded at 9:50AM.

## **III. Observations**

EPA inspectors were led on a walkthrough of the Facility at 9:50AM by Benjamin Romero of Collision 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 garage was a single bay which was deep enough to hold four cars. Since there was no paint booth to inspect, the inspection team first observed his spray guns which were located near the rear of the garage. The inspection team noted the following spray guns, some of which had limited identifying markings: H827W; H827W; HVLP Starting Line; STM HVLP; Tekna; HVLP; HVLP SATA jet NR 2000; LS 400; and Anest Iwata. The Facility stated they do not store paint, but instead only buy the paint for the job being completed. If there is any extra paint from a job, that paint will be used as a primer on another job.

There were two welders observed in the garage. A Millermatic 130 MIG welder and a century welder which the Facility said does not work. They stated welding is rarely done and there is no wire storage.

Collision said they do not have a computer for any records when asked about records for paint purchases. He provided a couple paper receipts showing paint purchases. One of the purchased paints was WBB half pint Wanda solid and metallic code PAF. Paints are purchased from Pro Colors on Rhode Island Avenue in Brentwood, MD.

The Facility stated there is a paint booth in the adjacent garage which is owned by Mr. Gupta. Collision is allowed to use this paint booth and Mr. Gupta charges Collision when they use it. However, Collision really has minimal access to it as there are multiple cars blocking the entry way and Collision doesn't have the ability to move these cars and doesn't have a key to access the paint booth. Collision said it is a different operator which operates the paint booth who separately pays Mr. Gupta to use the paint booth. The Facility stated this different operator actually operates as a subcontractor under the

Collision Auto Clinic company. The Facility stated this other operator rents the paint booth, while City Collision rents the garage. Collision stated the reason for this agreement is the other business was unsuccessful in getting a business license, so Mr. Gupta suggested the contractor splits utilities with Collision and operates under Collision Auto Clinic. The inspection team asked when this operator typically arrives, and the Facility said generally about 10AM or 11AM. The inspection decided to leave and return when the operator was more likely to be on-site. The inspection team left the Facility at 10:28AM telling Collision they would return later in the day.

The inspection team returned to the Facility at 11:41AM. The other operator was not yet on-site, so the inspection team did not have access to the paint booth and was not able to ask the other operator any questions. The inspection team then requested the Facility to call their paint supplier, Pro Colors, to see if the paint supplier could send SDS's for the paints used by Collision. The inspection team listened to the discussion as the Facility called Pro Colors and put their call on speaker. The paint supplier told the Facility they couldn't provide SDS's but could provide some paint codes over the phone. The paint supplier told the Facility the following codes: PAF dodge red; UEH black accord; KH3 black Nissan; and 6R1 Toyota green. The paint supplier stated they didn't track what specific paints were used by specific clients but only tracked the quantity, code, and price.

The walkthrough concluded at 11:53AM.

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

EPA inspectors, Benjamin Romero, Jacob Zangrilli, and Nelson Martinez had a brief closing conference to ask additional questions and discuss observations. The inspectors also discussed how Collision is currently painting in an open garage and not in a spray booth. 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.

Simultaneously, EPA will perform a detailed review of records and may have additional questions. Benjamin stated he preferred to receive the report by mail instead of electronic mail since he doesn't own a computer. EPA inspectors stated they would send the report by electronic mail but could also send the Facility a copy by mail. The inspection concluded at 12:10PM.

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 Collision.

- During the inspection, the Facility did not provide any documentation showing they are certified as required in NESHAP 6H.
- The Facility paints in an open garage without a spray booth or its associated filters. Because of this, the Facility could not provide any documentation showing their filter technology achieved

at least 98% capture of the paint overspray or that the spray booth 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 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: Collision Auto Clinic

Location: 2206 Lawrence Avenue NE, Washington, DC 20018

Inspection Date: December 5, 2023

EPA Inspector(s): Carly Joseph and Dean DeLuca

Photographer: Carly Joseph



Photo Number: 1

Photo Description: Collision Auto Clinic overview



Photo Number: 2

Photo Description: Two garage bays



Photo Number: 3

Photo Description: Collision Auto Clinic building exterior



Photo Number: 4

Photo Description: Collision Auto Clinic garage interior



Photo Number: 5

Photo Description: Spray guns



Photo Number: 6

Photo Description: Second image of different spray guns



Photo Number: 7

Photo Description: Third image of different spray guns



Photo Number: 8

Photo Description: Miller Welder



Photo Number: 9

Photo Description: Welder - not operational