



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of Meritt Cab Association
Inspection Date(s): December 6, 2023
Regulatory Program(s): NESHAP, SIP

Company Name: Same as below
Facility Name: Meritt Cab Association
Facility Location: 1801 Adams St. NE,
Washington, DC 20018

Latitude: 38.9202 **Longitude:** -76.9785
County/Parish: District of Columbia

AFS/ICIS-Air Number: 03000DC00006
Permit Number: N/A
NAICS Code: 811121 **SIC:** 7532
DSBID #: ECAD-77

Facility Representatives:	Point of Contact
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Nawaz Choudry, Owner	☒
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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 Meritt Cab Association (Meritt 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 1801 Adams St. NE, Washington, DC 20018. The Facility is a mechanical and an auto body shop. The Facility conducts 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 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.

Meritt 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)
- CAA Section 203(a)(3)(A) – prohibition against tampering on vehicles and engines.
- CAA Section 203(a)(3)(B) – prohibition against sale and installation of defeat devices

B. Inspection Opening Conference

At 9:45 AM on December 6, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Meritt was represented by manager, Arslan Shokat. Also, Jacob Zangrilli and Kush Kharod 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,

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

II. Site Activity/Process Description

Meritt Cab has operated at this location for more than ten years. They rent the property and typically operate from 9AM-5:30PM on Monday-Saturday. The Facility employs a total of six individuals, two of which are mechanics and two of which are auto body workers. One of the auto body employees started less than a year ago and the other has been employed for more than a year. The Facility has five garage bays including three vehicle lifts and one paint spray booth.

The Facility representative stated they own the enclosed spray booth but was unsure if they would take the enclosed spray booth if the business moved locations. The Facility representative indicated the enclosed spray booth was installed five or six years ago. They mostly paint vehicle parts instead of entire vehicles. The Facility stated they do all painting in the booth, including touch-ups, they do occasionally do minimal welding, and used oil is shipped off-site.

The opening conference concluded at 9:56AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 9:56AM by Arslan Shokat of Meritt and Jacob Zangrilli and Kush Kharod of DOEE were also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 1).

The inspection team first went to the spray booth which was in the bay farthest to left when looking at the bay doors. There was an odor observed in the spray booth indicating painting had recently been done and there was a car inside the spray booth. The exhaust filters were located opposite the vehicle entry indicating a crossdraft spray booth. There were exhaust locations which were missing exhaust filters. All the observed filters were heavily laden with dirt, dust, or paint overspray which could potentially decrease airflow. The vehicle entry was not a full door, but a metal mesh of approximately 9" squares covered with filters.

Facility representatives turned on the spray booth so the inspection team could observe the airflow through the booth. There was very little air movement being caused by the exhaust fan which was not able to demonstrate that air was entering the booth, so the booth was not able to demonstrate a negative air flow.

Directly outside the spray booth was the Facility's paint storage area. There were open paint containers and an open solvent container observed in this area as well as similar odors to those observed inside the spray booth. There were cans from multiple paint lines with a couple examples

being Wandabase HS and Nason. Two Central Pneumatic HVLP paint spray guns were located in the area. There was an open trash can with VOC laden materials. The painter described the process used to clean the spray guns. They run the solvent through the spray guns with low pressure. After going through the spray gun, the solvent runs into a smaller open container, which appeared to be approximately a pint to a quart in size. The liquid is then poured into a larger multi-gallon container which is closed once the liquid is poured. This liquid and paint waste is taken off-site at a later time.

The Facility stated they do not conduct any aftermarket exhaust work. The Facility also stated they do not use Methylene Chloride and do not conduct and chemical paint stripping. They just use an orbital sander for paint stripping. The spray booth filters were stated to be changed every two to four weeks based on use. The Facility uses 20" x 20" 300 series filters made by Air Filtration Co. Inc located in Corydon, IA.

The initial walkthrough concluded at 10:30AM.

The inspection team returned at 12:53PM to meet with the owner, Nawaz Choudry, because the Facility stated he would be better suited to answer some of the inspection team's questions. He stated the painters did not have any training certificates. He stated he purchased the paints from Kemperle Paint Supply, gave the inspection team a pair of invoices, and explained a little more about the painting process. The inspection team said we had previously done a more thorough closing conference but conducted an abbreviated one and asked if he had any additional questions for the inspection team. He did not and the team concluded the second on-site observations at 1:08PM.

IV. Closing Conference

EPA inspectors, Arslan Shokat, and Kush Kharod of DOEE 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 DOEE. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 10:34AM.

EPA inspectors, Arslan Shokat, Nawaz Choudry, and Kush Kharod of DOEE had a second brief closing conference to ask additional questions and discuss observations with the owner of Meritt. 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. This second closing conference concluded at 1:08PM.

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 Meritt.

- 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 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: Merrit Cab Association

Location: 1801 Adams St. NE, Washington DC, 20018

Inspection Date: December 6, 2023

EPA Inspector(s): Carly Joseph and Dean DeLuca

Photographer: Carly Joseph



Photo Number: 49

Photo Description: Meritt Cab exterior



Photo Number: 50

Photo Description: Paint booth



Photo Number: 51

Photo Description: Right side of paint booth vehicle entrance



Photo Number: 52

Photo Description: Paint booth vehicle entrance



Photo Number: 53

Photo Description: Exhaust filters in paint booth



Photo Number: 54

Photo Description: Paint storage area

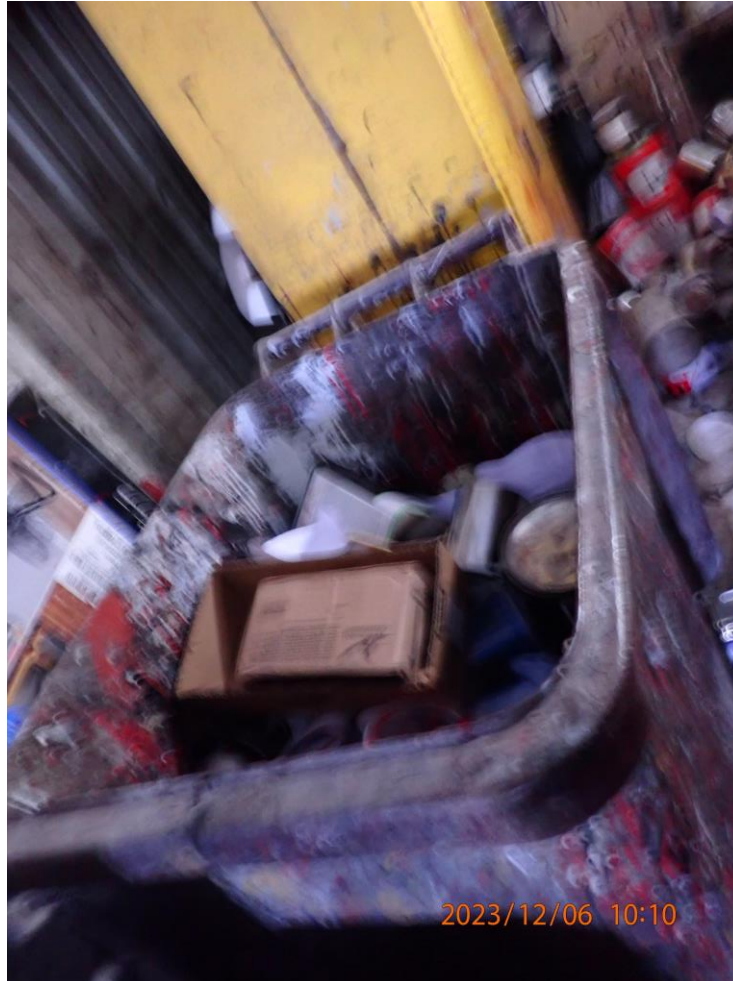


Photo Number: 55

Photo Description: Trash can in paint storage area



Photo Number: 56

Photo Description: Solvent container



Photo Number: 57

Photo Description: Spray booth filters