



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of ASF LLC dba GAB Auto Repair
Inspection Date(s): December 5, 2023
Regulatory Program(s): NESHAP, SIP

Company Name: ASF LLC
Facility Name: GAB Auto Repair
Facility Location: 1824 Fenwick St. NE,
Washington, DC 20002
Latitude: 38.9135 **Longitude:** -76.9842
County/Parish: District of Columbia

AFS/ICIS-Air Number: 03000DC00008
Permit Number: N/A
NAICS Code: 811121 **SIC:** 7532
DSBID #: ECAD-5372

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

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 GAB Auto Repair (GAB 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 1824 Fenwick St. NE, Washington, DC 20002. 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 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 received a minor permit No. 7037 from DOEE issued on February 5, 2019.

GAB 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 10:47AM on December 5, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. GAB was represented by Assefa Feleke. 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, GAB did not claim any photos or documentation as CBI and the Facility accompanied EPA during the inspection.

II. Site Activity/Process Description

GAB stated they have been in operation for approximately thirteen years. They conduct car repair, car painting, and stitch welding operations using oxygen, rods, and wires but do not conduct any paint stripping using Methylene Chloride. They typically operate from 9AM-6PM. There are three employees under the manager. GAB rents the property from 1824 Fenwick LLC with Victor being the contact.

The opening conference concluded at 10:54AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:54AM by Assefa Feleke of GAB 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 passed by a used oil storage tank on their way to the spray paint booth. The paint booth did not have a vehicle during the time of the inspection. Two Devilbiss Tekna Pro (or Pro-lite) spray guns were observed on-site. GAB stated they purchased paints from Penn Pro and Penn Supply which are both located in Heightsville, MD. There were some paints stored in the spray booth and others stored in a cabinet outside of the spray booth. Some of the brands on paint cans observed on-site were Limco, RM, and Dupont Chromabase.

The Facility had a Safety Kleen model No. 17.4R cold cleaning machine on-site which did not appear to be used very often. Assefa stated they use a water-based solvent from Safety Kleen. There were two 230V AC DC Infinite Amp Arc Welders located on-site. The Facility also provided two types of welding rods used on-site: USA 6013 and Fusion Flow E6013. The Facility had a draft DOEE air quality permit posted with a date of January 4, 2019.

GAB stated the spray booth filters are changed every ten or twelve cars and it could be more often if they are painting with clear coats. Assefa said that he and another painter employed at the location took a class, but they do not have any certifications at this time. The paint spray booth is a side down draft booth. The inspection team asked the Facility to turn on the booth so they could see the airflow through the booth. At the time of the inspection, the booth was operating at a negative pressure and was drawing air into the booth even when the back pedestrian was opened but was much better when that door was closed. The Facility's spray booth uses Series 45 Viskon-Aire filters.

The Facility stated they do not modify any exhausts and do not do any aftermarket work. All their work is repair work and they do not do any custom work.

The walkthrough concluded at 11:27AM.

IV. Closing Conference

EPA inspectors, Assefa Feleke, 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 DOEE. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 11:32AM.

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 GAB.

- 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.
- 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: ASF LLC dba GAB Auto Repair

Location: 1824 Fenwick St. NE, Washington, DC 20002

Inspection Date: December 5, 2023

EPA Inspector(s): Carly Joseph and Dean DeLuca

Photographer: Carly Joseph



Photo Number: 10

Photo Description: Overview of Facility



Photo Number: 11

Photo Description: Second overview of Facility



Photo Number: 12

Photo Description: Paint booth



Photo Number: 13

Photo Description: Paint spray guns



Photo Number: 14

Photo Description: Paint storage outside of booth



Photo Number: 15

Photo Description: Chromabase paint can



Photo Number: 16

Photo Description: Cold cleaning machine



Photo Number: 17

Photo Description: Welder with welding rods on top



2023/12/05 11:08

Photo Number: 18

Photo Description: USA 6013 welding rods



Photo Number: 19

Photo Description: Fusion Flow E6013 welding rods



Photo Number: 20

Photo Description: Fusion Flow E6013 welding rods2

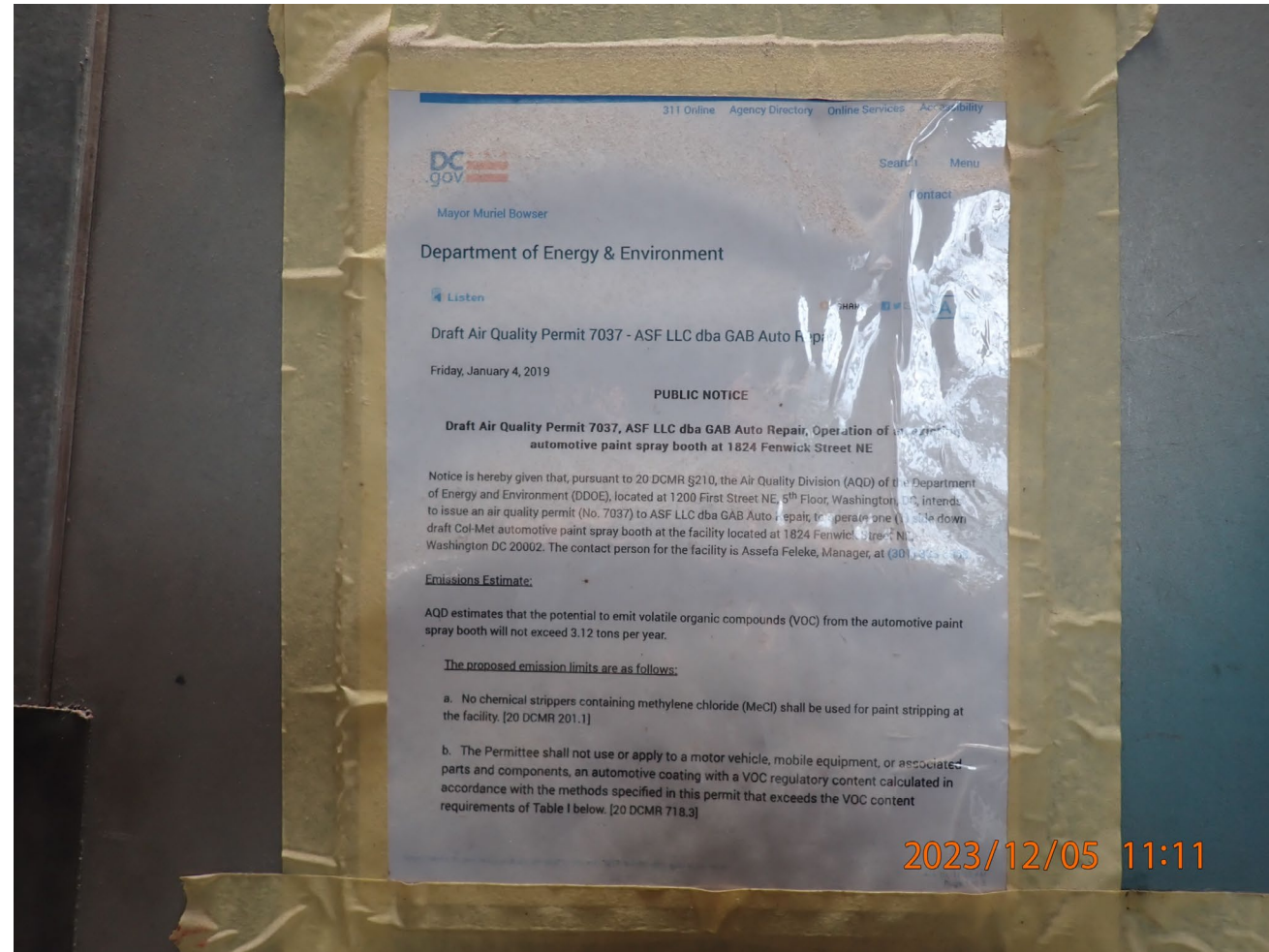


Photo Number: 21

Photo Description: Posted draft DOEE air quality permit



Photo Number: 22

Photo Description: Filter box