

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
Department of Energy and Environment

September 9, 2020

Mr. Eskinder Wondwossen  
Business Manager  
Challenger Cab LLC  
2626 Evarts Street NE  
Washington, DC 20018

**Subject: Permit No. 6166-R1 to Operate an Automotive Paint Spray Booth at 2626 Evarts Street NE, Washington DC**

Dear Mr. Wondwossen:

Pursuant to sections 200.1 and 200.2 of Title 20 of the District of Columbia Municipal Regulations (20 DCMR), a permit from the Department of Energy and Environment (“the Department”) shall be obtained before any person may construct and operate a stationary source in the District of Columbia. The application of Challenger Cab LLC (also known as C&W Auto Repair and Body Shop) (“the Permittee”) to operate an automotive paint spray booth at the Permittee’s facility located at 2626 Evarts Street NE, Washington DC 20018, per the submitted plans and specifications, dated June 1, 2016 (received June 2, 2016), is hereby approved, subject to the following conditions:

I. General Requirements:

- a. The paint spray booth shall be operated in accordance with the air pollution control requirements of 20 DCMR.
- b. This permit expires on September 8, 2025 [20 DCMR 200.4]. If continued operation after this date is desired, the Permittee shall submit an application for renewal by May 8, 2025.
- c. Operation of equipment under the authority of this permit shall be considered acceptance of its terms and conditions.
- d. The Permittee shall allow authorized officials of the District, upon presentation of identification, to:
  1. Enter upon the Permittee’s premises where a source or emission unit is located, an emissions related activity is conducted, or where records required by this permit are kept;
  2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of this permit;

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3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
4. Sample or monitor, at reasonable times, any substance or parameter for the purpose of assuring compliance with this permit or any applicable requirement.
- f. Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [20 DCMR 202.2]
- g. If an automotive refinishing facility is found to be in violation of a provision of 20 DCMR Chapters 1-15, the Department may require the installation of additional emission controls or curtailment of operations until compliance is demonstrated. [20 DCMR 718.18] Installation of such a control device will be subject to the permitting requirements of 20 DCMR 200.1 and this permit must be revised to incorporate requirements for the proper operation of such equipment as well as the testing methods of 20 DCMR 718.35 and the record keeping requirements of 20 DCMR 718.25.
- h. This permit shall be kept on the premises and produced upon request.
- i. Exemptions: Except Conditions II(h) and (i), the requirements of this permit do not apply to the following three materials:
  1. A nonrefillable aerosol coating product;
  2. An automotive coating that is sold, supplied, or offered for sale in one half (0.5) fluid ounce or smaller containers intended to be used by the general public for automotive touch-up or repair for small surface imperfections; and
  3. A locally prepared mix of solvent and some amount of film forming solids solely used to blend in spot repairs made to a discrete body panel, except that the application of cleaning solvent to a spot repair is not exempted.
- j. This permit supersedes and replaces Permit No. 6616, issued September 6, 2013.
- k. The Permittee shall only perform active painting operations on week days (Monday through Friday) and only between 10:00 AM and 5:00 PM. Painting during any other times is prohibited.

II. Emission Limits:

- a. No chemical strippers containing methylene chloride (MeCl) shall be used for paint stripping at the facility. [20 DCMR 201.1]

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- b. The Permittee shall not use or apply to a motor vehicle, mobile equipment, or associated parts and components, an automotive coating with a VOC regulatory content calculated in accordance with Condition II(d)(1) of this permit that exceeds the VOC content requirements of Table I below. [20 DCMR 718.3]

**Table I. Allowable VOC Content in Automotive Coatings for Motor Vehicle and Mobile Equipment Non-Assembly Line Refinishing and Recoating**

Coating Category	VOC Regulatory Limit As Applied*	
	(Pounds per gallon)	(Grams per liter)
Adhesion promoter	4.5	540
Automotive pretreatment coating	5.5	660
Automotive primer	2.1	250
Clear coating	2.1	250
Color coating, including metallic/iridescent color coating	3.5	420
Multicolor coating	5.7	680
Other automotive coating type	2.1	250
Single-stage coating, including single-stage metallic/iridescent coating	2.8	340
Temporary protective coating	0.50	60
Truck bed liner coating	1.7	200
Underbody coating	3.6	430
Uniform finish coating	4.5	540

\*VOC regulatory limit as applied = weight of VOC per volume of coating (prepared to manufacturer's recommended maximum VOC content, minus water and non-VOC solvents)

- c. Each cleaning solvent present at the facility shall not exceed a VOC content of twenty-five (25) grams per liter (twenty-one one-hundredths (0.21) pound per gallon), calculated in accordance with Condition II(d) of this permit, except for [20 DCMR 718.4]:
  - 1. Cleaning solvent used as bug and tar remover if the VOC content of the cleaning solvent does not exceed three hundred fifty (350) grams per liter (two and nine-tenths (2.9) pounds per gallon), where usage of cleaning solvent used as bug and tar remover is limited as follows:
    - A. Twenty (20) gallons in any consecutive twelve-month (12) period for an automotive refinishing facility and operations with four hundred (400) gallons or more of coating usage during the preceding twelve (12) calendar months;
    - B. Fifteen (15) gallons in any consecutive twelve-month (12) period for an automotive refinishing facility and operations with one hundred fifty (150)

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gallons or more of coating usage during the preceding twelve (12) calendar months; or

- C. Ten (10) gallons in any consecutive twelve-month (12) period for an automotive refinishing facility and operations with less than one hundred fifty (150) gallons of coating usage during the preceding twelve (12) calendar months;
  - 2. Cleaning solvents used to clean plastic parts just prior to coating or VOC-containing materials for the removal of wax and grease provided that non-aerosol, hand-held spray bottles are used with a maximum cleaning solvent VOC content of seven hundred eighty (780) grams per liter and the total volume of the cleaning solvent does not exceed twenty (20) gallons per consecutive twelve-month (12) period per automotive refinishing facility;
  - 3. Aerosol cleaning solvents if one hundred sixty (160) ounces or less are used per day per automotive refinishing facility; or
  - 4. Cleaning solvent with a VOC content no greater than three hundred fifty (350) grams per liter may be used at a volume equal to two-and-one-half percent (2.5%) of the preceding calendar year's annual coating usage up to a maximum of fifteen (15) gallons per calendar year of cleaning solvent.
- d. The VOC content of an automotive coating, automotive coating component, or cleaning solvent shall be calculated in accordance with the following, where [20 DCMR 718.6]:

VOC = VOC content in grams per liter;

Wv = Weight of total volatiles, in grams;

Ww = Weight of water, in grams;

Wec = Weight of exempt compounds, in grams;

Vm = Volume of material (coating or cleaning solvent, as applicable, including water, exempt compounds, and added solvent), in liters;

Vw = Volume of water, in liters; and

Vec = Volume of exempt compounds, in liters; and

To convert from grams per liter to pounds per gallon, multiply the result (VOC regulatory content) by  $8.345 \times 10^{-3}$  (pounds per gallon/grams per liter).

- 1. For VOC regulatory content for coatings, the weight of VOC per volume of coating, less water and exempt compounds, shall be calculated by the following equation:

$$\begin{array}{l} \text{VOC} \\ \text{regulatory} \\ \text{content} \end{array} = \frac{(W_v - W_w - W_{ec})}{(V_m - V_w - V_{ec})}$$

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2. For VOC actual content for coatings, the weight of VOC per volume of material, including the volume of water, exempt compounds and VOC solvent, shall be calculated by the following equation:

$$\begin{array}{l} \text{VOC} \\ \text{actual} \\ \text{content} \end{array} = \frac{(W_v - W_w - W_{ec})}{V_m}$$

3. For VOC content for cleaning solvents, the weight of VOC per volume of material shall be calculated by the following equation:

$$\begin{array}{l} \text{VOC} \\ \text{content} \end{array} = \frac{(W_v - W_w - W_{ec})}{V_m}$$

- e. To determine the physical properties of a coating to perform the calculations above, the coating shall be analyzed in accordance with the methods specified in 20 DCMR 718.28 (relating to coating analysis). [20 DCMR 718.7]
- f. If on the container of an automotive coating, or a label or sticker affixed to the container, or in sales, advertising, technical, or product literature, a representation is made that indicates that the coating meets the definition of or is recommended for use for more than one (1) of the coating categories listed in Condition II(b) (relating to coating VOC content limits), then the lowest applicable VOC content limit shall apply. [20 DCMR 718.8]
- g. The Permittee may not possess either of the following [20 DCMR 718.9]:
  1. An automotive coating that is not in compliance with Condition II(b) (relating to coating VOC content limits); and
  2. A cleaning solvent that does not meet the requirements of Condition II(c) (relating to cleaning solvent VOC content limits).
- h. An emission into the atmosphere of odorous or other air pollutants from any source in any quantity and of any characteristic, and duration which is, or is likely to be injurious to the public health or welfare, or which interferes with the reasonable enjoyment of life or property is prohibited [20 DCMR 903.1]
- i. Visible emissions shall not be emitted into the outdoor atmosphere from the paint booth. [20 DCMR 201.1, 20 DCMR 606, and 20 DCMR 903.1]

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**III. Operational Limits and Standards:**

- a. The Permittee may not apply an automotive coating to a motor vehicle, mobile equipment, or associated parts and components, unless one (1) or more of the following application methods is used [20 DCMR 718.11 and 40 CFR 63.11173(e)(3)]:
  1. Flow/curtain coating;
  2. Dip coating;
  3. Roller coating;
  4. Brush coating;
  5. Cotton-tipped swab application;
  6. Spray-applied coatings limited to:
    - A. High-volume low-pressure (HVLP) spraying;
    - B. Electrostatic application;
    - C. Airless spray; and
    - D. Air-assisted airless spray; or
  7. An alternative method approved in accordance with 20 DCMR 718.11(g) or (h).
- b. The application requirements of Condition III(a) (relating to coating application methods) do not apply to the following [20 DCMR 718.12]:
  1. Graphic arts operations;
  2. A coating use of less than one (1) fluid ounce (twenty-nine and six tenths (29.6) milliliters);
  3. The application of underbody coatings; and
  4. The application of truck bed liner coatings.
- c. The Permittee shall ensure that all emissions from the application of automotive coatings for motor vehicle and mobile equipment be exhausted through a stack that meets all of the following requirements [20 DCMR 718.19]:

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1. Discharges at least 27 feet, 4 inches above the floor slab inside the building [20 DCMR 201 and 718.19];
  2. Discharges at least five (5) feet above the roof peak;
  3. Discharges vertically upward above the roof peak;
  4. Discharges at a height and exhaust velocity sufficient to avoid the exhaust being circulated adjacent to the building due to building downwash effects or drawn into nearby building intakes so as to ensure compliance with 20 DCMR 201 and 20 DCMR 903; and
  5. Not equipped with anything that would impede the upward discharge of the exhaust air, such as rain caps. Other techniques may be installed to prevent snow and ice from entering the exhaust system, such as butterfly caps or stack sleeves.
- d. Spray guns used to apply automotive coating components or automotive coatings shall be cleaned by one (1) or a combination of the following [20 DCMR 718.15 and 40 CFR 63.11173(e)(4)]:
1. A fully enclosed spray gun cleaning system that is kept closed when not in use, where the active and passive solvent losses from the use of the system shall be determined in accordance with the requirements of 20 DCMR 718.34;
  2. An unatomized discharge of cleaning solvent into a paint waste container that is kept closed when not in use; or
  3. Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use.
- e. The paint spray booth shall meet the following specifications and operational requirements:
1. The unit shall be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. [20 DCMR 718.17(b) and 40 CFR 63.11173 (e)(2)(i)]
  2. The particulate matter exhaust filters shall be replaced as specified by manufacturers' specifications. If such specifications are unavailable or do not indicate a replacement frequency, they shall be replaced at least once every month or whenever a filter deficiency is identified, whichever is more frequent. There shall be at least one carton of replacement filters onsite at all times (except a reasonable time immediately after

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- replacement to allow for shipping of new filters, in which case the Permittee shall be able to show that new filters have been ordered). [20 DCMR 201]
3. In addition to particulate matter exhaust filters for control of paint overspray, the Permittee shall maintain carbon filters in line with the particulate matter filters. Replacement of these filters shall be performed on a frequency sufficient to, along with other measures implemented at the facility, ensure compliance with the odor requirements of Condition II(h). [20 DCMR 201 and 20 DCMR 718.18]
  4. The unit shall be fully enclosed with a full roof and four complete walls and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls. [40 CFR 63.11173(e)(2)(ii)] The negative pressure maintained shall be sufficient to ensure that no emissions are exiting the booth anywhere except the exhaust stack. [20 DCMR 718.7(c)]
  5. The Permittee shall close all paint spray booth openings while a coating is applied, during the time period required for drying of the coating, and while any other operation may release emissions. [20 DCMR 718.17(a)]
  6. The Permittee shall maintain in good working order and operate according to manufacturer specifications the monitoring, exhaust, and control systems within the paint spray booth. [20 DCMR 718.17(d)]
- f. The Permittee shall ensure that [20 DCMR 718.16]:
1. Fresh and used automotive coating components, automotive coatings, solvents, and cleaning solvents are stored in vapor-tight, nonabsorbent, nonleaking containers that are kept closed at all times except when filling or emptying;
  2. Cloth and paper, or other absorbent applicators, moistened with automotive coating components, automotive coatings, solvents, or cleaning solvents are stored in vapor-tight, nonabsorbent, nonleaking containers that are kept closed at all times except when filling or emptying;
  3. Handling and transfer procedures minimize spills during the transfer of automotive coating components, automotive coatings, solvents, and cleaning solvents;
  4. Any person who uses or applies automotive coating components, automotive coatings, solvents, or cleaning solvents is trained in the proper use and handling of the automotive coating components, automotive coatings, solvents, cleaning solvents, and waste products in order to minimize the emission of air contaminants and to comply with the requirements of 20 DCMR 718, as incorporated into the conditions of this permit; and



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5. Ensure that all training is in compliance with the requirements of Condition III(g).
- g. The Permittee shall comply with the following training measures [20 DCMR 718.16(e), 20 DCMR 1409]:
1. Ensure that any person who applies mobile equipment repair and refinishing coatings is trained in the proper use and handling of the mobile equipment repair and refinishing coatings, solvents and waste products. [40 CFR 63.11173(e)-(g)]
  2. All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for such training and certification are described in Condition III(g)(3) of this permit. The spray application of surface coatings is prohibited by persons who are not certified as having completed the described training. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. [40 CFR 63.11173(e)(1)]
  3. Within 180 days of their hiring date, the Permittee must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings are trained in the proper application of surface coatings as required by Condition III(g)(2) of this permit. The training program must include, at a minimum, the following [40 CFR 63.11173(f) and 40 CFR 63.11174(g)(1)]:
    - A. A list of all current personnel by name and job description who are required to be trained;
    - B. Hands-on classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
      - i. Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
      - ii. Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
      - iii. Routine spray booth and filter maintenance, including filter selection and installation.

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- iv. Environmental compliance with the requirements of 40 CFR 63, Subpart HHHHHH.

If the Permittee can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in i-iv above the Permittee is not required to provide this initial training to these painters.

Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in i-iv above satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

- C. A description of the methods to be used at the completion of the initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training.
- 4. Training and certification will be valid for a period not to exceed five years after the date the training is complete, and all personnel must receive refresher training that meets the requirements of Condition III(g)(3) and be recertified every five years. [40 CFR 63.11173(g)(3)]
- h. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the spray painting equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
  - i. The Permittee shall perform active painting activities only in accordance with the schedule specified in Condition I(k).

**IV. Monitoring and Testing Requirements:**

- a. The Permittee shall monitor the contents of any chemical strippers used at the facility to ensure that they do not contain methylene chloride (MeCl).
- b. The Permittee shall track the volatile organic compound (VOC) content of all automotive coatings, automotive coating components, ready-to-spray coatings (based on the manufacturer's stated mix ratio), and cleaning solvents at the facility to ensure compliance with Conditions II(b), II(c), and II(g).

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- c. The Permittee shall maintain an awareness of the area to ensure that the odor and nuisance air pollutant requirements of Condition II(h) are met.
- d. The Permittee shall monitor the emission point from the spray booth to ensure that the requirements of Condition II(i) are met.
- e. The Permittee shall monitor the backup stores of spray booth filters to ensure that all filters meet the requirements of Conditions III(e)(1), (2), and (3).
- f. The Permittee shall monitor the maintenance and operational status of the spray booth and the activities performed in the spray booth and at the facility to ensure compliance with the requirements of Conditions III(e), III(f), and III(h).
- g. If a spray equipment coating application technology is used, the Permittee shall demonstrate that the equipment meets one of the following [20 DCMR 718.13]:
  1. The definition of HVLP spray in 20 DCMR 799 in design and use, where a satisfactory demonstration shall comply with Condition IV(g)(2) or be based on:
    - A. The manufacturer's published technical material on the design of the equipment; and
    - B. A demonstration of the operation of the equipment using an air pressure cap test gauge from the manufacturer of the equipment; or

*Note: The definition of HVLP spray in 20 DCMR 799 is as follows: spray equipment permanently labeled HVLP that is designed and operated between one tenth of a pound (0.1 lb.) and ten pounds (10.0 lb.) per square inch gauge (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns.*
  2. The alternative spray coating application method transfer efficiency requirement of 20 DCMR 718.11(g) (as referenced in Condition III(a)(7)), where a satisfactory demonstration shall include the following:
    - A. Written determination of the transfer efficiency in accordance with the test methods in Conditions IV(l) and IV(m) (relating to spray equipment transfer efficiency and spray equipment HVLP equivalency); and
    - B. Written documentation that the alternative spray coating application method has been approved by the Department for use in the District.

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- h. If an alternative spray or non-spray coating application technology or method is used pursuant to 20 DCMR 718.11(h) (as referenced in Condition III(a)(7)), the Permittee shall demonstrate its approval status in accordance with 20 DCMR 718.14.
- i. To determine compliance with this permit, the test methods specified in Conditions IV(j) through IV(q) shall be used.
- j. The test method for coating analysis shall be as follows [20 DCMR 718.28]:
  - 1. To perform the calculations specified in Condition II(d) (related to calculation of VOC content), the physical properties of automotive coatings, automotive coating components, and cleaning solvents subject to this section shall be determined using the most recent version of one of the following:
    - A. EPA Reference Method 24, *Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings*, 40 CFR Part 60, Appendix A;
    - B. SCAQMD Method 304-91, *Determination of Volatile Organic Compounds (VOC) in Various Materials*; or
    - C. An alternative method, formulation data, or other reasonable means for predicting that the coating has been formulated as intended, if approved in writing by the Department.
  - 2. If there are inconsistencies between the results of an EPA Reference Method 24 test and another means for determining the physical properties of the coating and subsequent VOC content, the EPA Reference Method 24 test results shall govern, except when an alternative method is approved as specified in Condition IV(j)(1)(C).
- k. The identity and concentration of exempt organic compounds shall be determined using the most recent version of one (1) or more of the following [20 DCMR 718.29]:
  - 1. ASTM D6133, *Standard Test Method for Acetone, p-Chlorobenzotrifluoride, Methyl Acetate or t-Butyl Acetate Content of Solventborne and Waterborne Paints, Coatings, Resins, and Raw Materials by Direct Injection Into a Gas Chromatograph*;
  - 2. ASTM D4457, *Standard Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph*;
  - 3. CARB Method 432, *Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings*;

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4. CARB Method 422, *Determination of Volatile Organic Compounds in Emissions from Stationary Sources*; or
  5. SCAQMD Method 303, *Determination of Exempt Compounds*.
- l. Measurement of acid content in automotive pretreatment coating, as specified in 20 DCMR 799 (defining automotive pretreatment coatings), shall be determined by using the most recent version of ASTM D1613, *Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer, and Related Products*. [20 DCMR 718.30]
  - m. The metallic content of a metallic or iridescent color coating, as specified in 20 DCMR 799 (defining metallic/iridescent color coating), shall be determined by the most recent version of SCAQMD Method 318, *Determination of Weight Percent Elemental Metal in Coatings by X-ray*. [20 DCMR 718.31]
  - n. Spray equipment transfer efficiency, as specified in 20 DCMR 799 and 20 DCMR 718.11(g), as referenced in Condition III(a)(7), (defining and relating to coating application methods, respectively), shall be determined by using the most recent version of the SCAQMD Test Procedure, *Spray Equipment Transfer Efficiency Test Procedure for Equipment User*. [20 DCMR 718.32]
  - o. Spray equipment HVLP equivalency, as specified in Condition IV(g) (relating to the use of a spray gun), shall be determined by using the most recent version of one of the following [20 DCMR 718.33]:
    1. SCAQMD Guidelines, *Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns*; or
    2. The Environmental Technology Verification ETV Protocol, *HVLP Coating Equipment, Generic Testing and Quality Assurance Protocol*, prepared by the National Defense Center for Environmental Excellence, operated by Concurrent Technologies Corporation.
  - p. The active and passive solvent losses from the use of an enclosed spray gun cleaning system or equivalent cleaning system, as specified in Condition III(d)(1) (relating to spray gun cleaning systems), shall be determined using the most recent version of SCAQMD Method, *General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems*. [20 DCMR 718.34]
    1. The test solvent for this determination shall be a lacquer thinner with a minimum vapor pressure of one hundred five millimeters (105 mm) of mercury at twenty degrees Celsius (20°C); and

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2. The minimum test temperature shall be fifteen degrees Celsius (15°C).
- q. The use of other test methods that are determined to be equivalent or better and approved, in writing, by the Department or the Administrator may be used in place of the test methods specified in Conditions IV(j) through IV(p). [20 DCMR 718.36]
- r. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]

**V. Record Keeping Requirements:**

The Permittee shall maintain the following records for not less than five years from the date of each record and shall make such records available to the Department for inspection upon request. [20 DCMR 500.8, 20 DCMR 718.23, and 40 CFR 63.11178]

- a. The Permittee shall maintain records of the types of chemical paint strippers used at the facility as well as their chemical make-up.
- b. For any automotive coatings, automotive coating components, ready-to-spray coatings (based on the manufacturer's stated mix ratio), and cleaning solvents used at the facility, the Permittee shall maintain and have available at all times at the facility the following [20 DCMR 718.24]:
  1. A list of all coatings, coating components, and cleaning solvents used at the automotive refinishing facility, including:
    - A. Whether the material is a coating, coating component, or cleaning solvent;
    - B. Coating, coating component, or cleaning solvent name and manufacturer;
    - C. Application method;
    - D. Coating type as listed in 20 DCMR 718.3 (relating to coating VOC content limits);
    - E. The mix ratio specific to the coating or coating component; and
    - F. The VOC actual content and VOC regulatory content, as applied, for each ready to spray or ready to apply coating or cleaning solvent and copies of data sheets documenting how as applied values were determined;

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2. The VOC actual and VOC regulatory content as supplied and copies of product data sheets, material safety data sheets, or other data sheets documenting the as supplied value; and
3. Purchase records identifying the following:
  - A. The coating type (as listed in Condition II(b), Table I of this permit);
  - B. The name of the coating, coating component, or cleaning solvent; and
  - C. The volume purchased of the coating, coating component, or cleaning solvent.
- c. The Permittee shall maintain records of the type(s) of spray guns and other coating application methods in use and the results of any compliance demonstrations performed pursuant to Condition IV(g) or IV(h).
- d. The Permittee shall maintain records of the type and capture efficiency (also known as arrestance) of all spray booth filters used at the facility [40 CFR 63.11177(b)].
- e. The Permittee shall maintain records of the replacement dates of spray booth filters and the numbers and type of filters replaced to document compliance with Conditions III(e)(2) and (3).
- f. The Permittee shall maintain records of all maintenance performed on the spray booth.
- g. The Permittee shall maintain records of certifications that each painter has completed the training specified in Condition III(g)(3). [40 CFR 63.11177(a)]
- h. The Permittee shall maintain records of all painter training required under Condition III(g) of this permit.
- i. The Permittee shall maintain copies of any notification and report required under Condition VI of this permit. [40 CFR 63.11177(d)]
- j. The Permittee shall maintain records of any deviation from the requirements of this permit. These records must include the date and time period of the deviation and a description of the nature of the deviation and the actions taken to correct the deviation. [40 CFR 63.11177(g)]
- k. The Permittee shall keep records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report specified in Condition IV of this permit. [40 CFR 63.11177(h)]

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1. The Permittee shall maintain records of the date of each painting event, as well as the time that active painting begins and ends during each painting event to ensure compliance with Conditions I(k) and III(i).

**VI. Notification and Reporting Requirements:**

- a. Notifications required by Condition VI(b) shall be submitted to each of the following addresses:

EPA Region III  
Director  
Air Protection Division  
1650 Arch Street  
Philadelphia, PA 19103

and

Chief, Compliance and Enforcement Branch  
Department of Energy and Environment  
Air Quality Division  
1200 First St NE, 5<sup>th</sup> Floor  
Washington DC 20002

- b. *Annual Notification of Changes Report:* The Permittee shall submit a report, to the addresses specified in Condition VI(a), in each calendar year in which information previously submitted in either the Initial Notification (see 40 CFR 63.11175(a)), the Notification of Compliance (see 40 CFR 63.11175(b)), or a previous Annual Notification of Changes Report has changed. Deviations from the requirements of this permit will be considered to be a change. This report must be submitted prior to March 1 of each calendar year when reportable changes occurred during the previous calendar year and must include the following information [40 CFR 63.11176(a)]:
  1. The company's name and the street address (physical location) of the affected source (the facility) and the street address where compliance records are maintained, if different; and
  2. The name, title, address, telephone number, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this permit or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.



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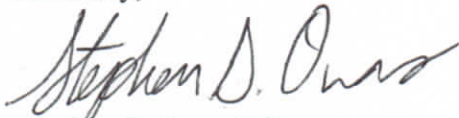
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- c. The Permittee shall immediately contact the Air Quality Division's Compliance and Enforcement Branch upon becoming aware of a sudden equipment failure or emergency or emissions in excess of any emission limit.
  
- d. In addition to complying with Condition VI(c) and any other reporting requirements mandated by the District of Columbia, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:
  1. The name and location of the facility;
  2. The subject source(s) that failed, experienced the emergency, or caused the excess emissions;
  3. The time and date of the first observation of the equipment failure, emergency, or excess emissions;
  4. The cause and estimate/expected duration of the excess emissions (if applicable); and
  5. The proposed corrective actions and schedule to correct the conditions causing the emergency or excess emissions.

If there are any further questions, please call me at (202) 535-1747 or John C. Nwoke at (202) 724-7778.

Sincerely;



Stephen S. Ours, P.E.  
Chief, Permitting Branch

SSO/JCN