

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

COMMENT RECONCILIATION MEMORANDUM

TO: File

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

FROM: Pilar M. Jackson
Environmental Protection Specialist

SUBJECT: Responses to Comments on Wonder Automotive Inc. Draft Permit No. 7433 to Operate an Automotive Paint Spray Booth at 1141 Bladensburg Rd NE, Washington DC

DATE: March 2, 2026

BACKGROUND

Wonder Automotive Inc., located at 1141 Bladensburg Rd NE, Washington, DC 20002, submitted a permit application to the Department of Energy and Environment's Air Quality Division (AQD) on October 20, 2025. The application was for the operation of an existing spray paint booth at its automotive facility. This booth is used for full-body painting, sanding, and priming operations, and uses high-volume low-pressure (HVLP) spray guns.

This permit is required because the facility qualifies as a new source under 20 DCMR 718-Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations Regulations, which applies to any automobile refinishing facility that began operations after February 9, 2016. According to the application, Wonder Automotive began operating as a spray paint shop on July 20, 2020.

As a part of the application process, Wonder Automotive submitted a Certificate of Clean Hands on October 20, 2025, and paid the application fee on October 28, 2025. To date, no Odor Control Plan (OCP) has been received from the applicant, however OCP activities are handled as a separate process independent of the Chapter 2 permitting process being addressed herein.

The proposed permit action was published in the DC Register on January 2, 2026, with a public comment period through February 2, 2026. During this time, stakeholders and members of the public were invited to submit comments regarding the permit. The comments received are addressed below.

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DOEE RESPONSES TO COMMENTS

DOEE received a long-form comment email from an ANC Commissioner on January 26, 2026. DOEE provides the following responses to the comments therein.

Comment 1:

Our community supports local businesses and wants them to succeed. At the same time, it is essential that operations do not negatively impact the health, safety, and quality of life of nearby residents. These priorities must be balanced, particularly given the facility's proximity to homes.

Residents are concerned about potential emissions and long-term exposure. While I understand that the facility is not required to maintain ambient monitoring and that emissions are calculated based on materials used, the lack of site-specific data has contributed to uncertainty. I also understand that DOEE has not ordered operations to cease during permitting and that zoning issues fall outside the air quality permit review.

It is often said that every map of the District looks the same. When it comes to pollution and environmental hazards, the saying certainly holds true. For decades, the District has concentrated facilities that produce air pollution, hazardous waste, water pollution, stormwater runoff, and urban heat island effects in low-income and predominantly Black neighborhoods. Residents in communities have disproportionately borne the burden of these environmental hazards. Instead of addressing these inequities, land use, planning, and permitting processes have historically exposed these neighborhoods to an accumulation of harms.

The Environmental Justice Amendment Act of 2023 establishes processes and accountability measures to address cumulative environmental impacts, ensure transparency, and require meaningful community engagement. Among other things, it requires assessments of cumulative impacts in overburdened communities and directs that actions causing disproportionate harm may be denied, unless they reduce stressors or provide direct benefits to the community.

DOEE Response:

The air quality permit process is designed to ensure that air quality regulatory requirements are met by the facility. Issues of zoning or plant location cannot be addressed through an air quality permit process. The air quality permitting process does not allow DOEE to move the facility, rezone the facility, create an industrial buffer, encourage a different use of the land, or take other land use actions.

The Environmental Justice Amendment Act of 2023 is proposed legislation at this time and has not been passed by the D.C. Council. As such, at this time, it does not impose any requirements or have any legal force. However, DOEE remains committed to advancing environmental justice principles within the scope of its existing authority, as reflected in the agency's Racial Equity Action Plan (REAP). In particular, REAP Goal 3 emphasizes equitable community engagement

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and language access, which aligns with the Act's intent to ensure transparency and meaning involvement of overburdened communities. More on DOEE's REAP can be found here: https://ore.dc.gov/sites/default/files/dc/sites/ore/page_content/attachments/ORE-REAP-020124.pdf. Consistent with this concept, in the case of this draft permit, DOEE directly notified the ANC Commissioner of the opportunity for review and public comment.

Comment 2:

I respectfully urge DOEE to: Ensure permit conditions adequately protect public health.

DOEE Response:

To ensure permit conditions adequately protect public health, DOEE has incorporated all applicable federal and District air quality regulatory requirements in the permit, such as those limiting VOC content in coatings and solvents and those specifying paint booth and exhaust stack design requirements to minimize pollutant emissions and public exposure. These regulations are designed to provide for the protection of public health.

Comment 3:

I respectfully urge DOEE to: Set clear operational limits, control measures, and inspection requirements.

DOEE Response:

DOEE has, in fact, prepared a permit that clearly states the operational limits and equipment standards that Wonder Automotive Inc. will be subject to upon issuance of the permit. These are concentrated in Condition III of the permit. Additionally, the facility's monitoring and testing requirements are laid out in Condition IV of the permit. They will be required to keep records to document compliance or non-compliance per Condition V of the permit.

Comments 4 and 5:

I respectfully urge DOEE to: Maintain robust enforcement to ensure ongoing compliance; and

I respectfully urge DOEE to: Implement periodic reviews—ideally annually—to confirm the business is operating within permit limits.

DOEE Response:

DOEE inspection responsibilities are not addressed in a permit. DOEE has the authority to perform inspections as determined to be appropriate and necessary to enforce compliance with the permit, and DOEE performs such inspections, some announced and others unannounced, at frequencies deemed appropriate. Inspection frequency may vary based on compliance history, facility risk profile, and other operational considerations.

Comment 6:

I respectfully urge DOEE to: Improve transparency and communication with the community.

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DOEE Response:

DOEE community outreach and communication activities are not addressed in an air quality permit. DOEE does not have the authority to require a permittee to engage in direct communication with the community as a condition of the permit. However, DOEE will continue to respond promptly to complaints and other concerns raised by the community. Additionally, DOEE encourages facilities to maintain open communication with their neighbors as a best practice, even though it is not a regulatory requirement.

RECOMMENDATIONS

DOEE has reviewed and responded to all comments received in response to the publication of this draft air quality permit. As discussed in the comment responses, no appropriate revisions to the permit have been identified. As such, prompt issuance of permit No. 7433 to authorize operation of the Wonder Automotive, Inc. facility at 1141 Bladensburg Road NE, Washington, DC is warranted and appropriate. DOEE will address OCP requirements through a separate administrative process.

SSO/PMJ