
Chapter 5c:

Auto Body Shops

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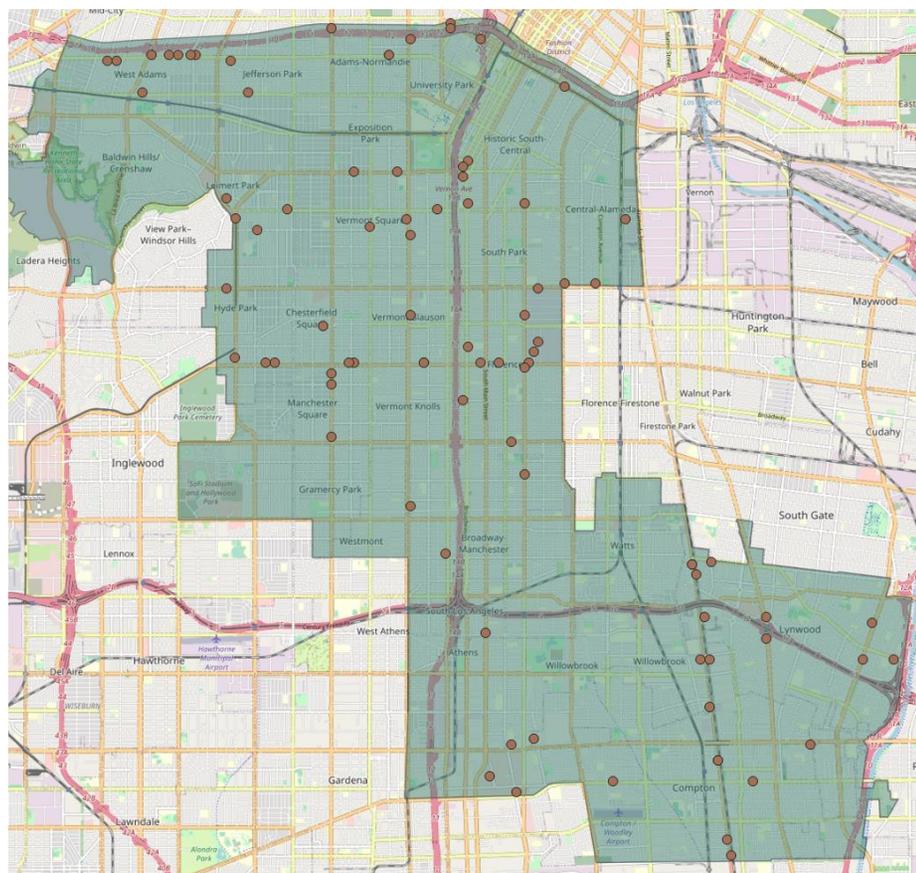
Community Concerns

During the Community Steering Committee (CSC) meetings, the co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) CSC identified auto body shops as an air quality concern for this community. During the CSC meetings, concerns were raised regarding the volume and activities of both permitted and unpermitted auto body shops and their proximity to residences, schools, and public gathering areas. The CSC has also expressed concerns with soil and water contamination, proper hazardous waste disposal, land-use issues, worker exposure, and noise pollution from some auto body shops. CSC members identified facilities and operations conducted at vacant lots on Central Avenue, Florence Avenue, Western Avenue, Jefferson Boulevard, Manchester Avenue, and the Slauson Corridor as a few locations of concern. CSC members believe that these small businesses are likely unaware of existing regulatory requirements, best management practices to reduce pollution burden, and the health impact of their operations on the community.

Regulatory Background

South Coast Air Quality Management District's (South Coast AQMD's) permitting program was established to implement the requirements of the federal and state Clean Air Acts (CAAs), and applicable air quality rules and regulations by specifying operating and compliance requirements for stationary sources that emit air

Figure 5c-1: Permitted Auto Body Shops in SLA



contaminants. Based on the South Coast AQMD permitting database, there are approximately 89 permitted¹ auto body shops within the SLA community boundary (**Figure 5c-1**). South Coast AQMD utilizes multiple methods to classify facility types including the North American Industrial Classification Codes (NAICS), a key data source for information in this CERP. South Coast AQMD inspection teams use a broader category, Technical Specialty Code (TS-Code),² to categorize a facility, which does not detail industry type. Please refer to Appendix 4: Enforcement Overview and History for information on which inspection team conducts the inspection for each facility, which is directly tied to the TS-Code. Permitted auto body shops must comply with the requirements in the permit(s) issued by South Coast AQMD as well as any applicable South Coast AQMD rules. Auto body shops conduct a variety of operations specializing in the repair of vehicles by fixing paint or body damage from scratches, dents, and collisions. Coating application equipment, emissions from automotive coating, and solvent cleaning materials and their related operations conducted by auto body shops may be subject to South Coast AQMD's Rules, such as Rules 481,³ 1151,⁴ 1168,⁵ and 1171.⁶ If vehicles are not present but coatings are being applied to metal parts, auto body shops may be subject to Rule 1107.⁷ California Air Resources Board's (CARB's) Consumer Products Regulation⁸ may apply to products used at auto body shops. Some of these products may cause odors and emit air pollutants, including volatile organic compounds, and may include toxic air contaminants (TACs). The emissions and odors may come from solvents evaporating from paint and solvent application, cleaning of parts, and improper storage. Auto body shops may also conduct operations such as sanding and grinding, which can emit fine dust. Auto body shops subject to CARB's Criteria Pollutant and Toxics Emissions Reporting (CTR) regulation will begin reporting emissions to South Coast AQMD in spring of 2025.⁹ For additional details regarding regulatory efforts for and regulations related to auto body shops, please refer to Appendix 5c: Auto Body Shops.

¹ Any equipment that emits or controls air contaminants (such as nitrogen oxides or reactive organic gases) requires a permit from South Coast AQMD prior to construction, installation, or operation unless it is specifically exempted from the permit requirement by South Coast AQMD per Rule 219 – Equipment not Requiring a Written Permit Pursuant to Regulation II, <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf>

² TS-Code refers to the internal code South Coast AQMD inspectors use to determine the appropriate inspection team. Please refer to Appendix 4: Enforcement Overview and History for more information on South Coast AQMD inspection teams.

³ South Coast AQMD, Rule 481 – Spray Coating Operations, <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-481.pdf>

⁴ South Coast AQMD, Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1151.pdf>

⁵ South Coast AQMD, Rule 1168 – Adhesive and Sealant Applications, <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1168.pdf>

⁶ South Coast AQMD, Rule 1171 – Solvent Cleaning Operations, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1171.pdf>

⁷ South Coast AQMD, Rule 1107— Coating of Metal Parts and Products, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1107.pdf>

⁸ CARB, Consumer Products Program, <https://ww2.arb.ca.gov/our-work/programs/consumer-products-program>

⁹ CARB, Criteria Pollutant and Toxics Emissions Reporting (CTR), <https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting>

Actions to Reduce Emissions or Exposure

During development of this CERP, the CSC requested that both outreach and enforcement be conducted at auto body shops to inform these businesses of operational requirements mandated by various government agencies with authority over this industry, such as South Coast AQMD, local land-use agencies, and local fire departments. The CSC requested the following goals for auto body shops in SLA.

- A. Inform the community of applicable rules and regulations, monitoring and enforcement efforts, and the permitting process as they relate to auto body shops.
- B. Identify facilities of concern, conduct enforcement activity, and conduct outreach on best management practices at these facilities.
- C. Collaborate with appropriate agencies when issues are identified at auto body shops during inspection sweeps to ensure these facilities follow rules and regulations from appropriate agencies, in particular those related to soil contamination, hazardous waste disposal, land-use, and noise pollution.
- D. Inform auto body shops of best practices and applicable rules and regulations, and provide information on South Coast AQMD's Small Business Assistance program.¹⁰
- E. Conduct air measurement surveys to identify facilities with potential elevated emissions and to characterize these emissions.
- F. Ensure facilities are properly classified and verify compliance with applicable rules and regulations.
- G. Reduce emissions and exposure to auto body shops through rule amendments to Rules 1151¹¹ and 1171.¹²
- H. Incentivize funding opportunities for low-volatile organic compound (VOC) paint and coatings and water-based cleaners used at auto body shops within the community.

The CSC developed the following CERP actions to address community concerns regarding the eight CERP goals.

Table 5c-1 below summarizes goals, actions, metrics, and provides a timeline to achieve emissions or exposure reductions from auto body shops in SLA.

¹⁰ South Coast AQMD, Small Business Assistance, <http://www.aqmd.gov/home/programs/business/business-detail?title=small-business-assistance>

¹¹ South Coast AQMD, Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1151.pdf>

¹² South Coast AQMD, Rule 1171 – Solvent Cleaning Operations, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1171.pdf>

Table 5c-1: Actions to Reduce Emissions from and Exposure to Auto Body Shops

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
A: Inform Community of Pertinent Rules	<ul style="list-style-type: none"> Conduct a workshop for the CSC describing applicable rules and regulations, permitting process, and enforcement efforts around auto body shops Collaborate with partner agencies who also have jurisdiction over auto body shops (e.g., local land-use agencies, Bureau of Automotive Repair, Department of Toxics Substances Control (DTSC), Certified Unified Program Agencies (CUPA), local fire departments) to present information regarding their authority at Auto Body Shops Workshop Collaborate with CSC to present information regarding their concerns related to auto body shops at Auto Body Shops Workshop (e.g., safer alternatives, processes to reduce emissions and exposures) 	South Coast AQMD CARB	Conduct Auto Body Shops Workshop for the CSC	1 st quarter, 2023	2 nd quarter, 2025
B: Identify Facilities of Concern	<ul style="list-style-type: none"> Work with the CSC to identify and prioritize locations of concern Conduct auto body shop inspection sweeps, prioritizing CSC-identified 	South Coast AQMD CSC	<ul style="list-style-type: none"> Develop list of identified and prioritized locations of concern, in part using data reporting 	2 nd quarter, 2022	2 nd quarter, 2026

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
	locations, and taking enforcement action when appropriate		from CARB’s CTR regulation <ul style="list-style-type: none"> Number of inspection sweeps and enforcement actions 		
C: Agency Referrals	Collaborate with appropriate agencies by reporting issues that fall outside of South Coast AQMD’s jurisdiction during auto body shop inspection sweeps (e.g., Bureau of Automotive Repair, California Division of Occupational Safety and Health (Cal/OSHA), CUPA, public health departments, DTSC, local fire departments)	South Coast AQMD CARB	Number of updates regarding referrals or follow-up information presented by the appropriate agency(ies) to the CSC	2 nd quarter, 2022	2 nd quarter, 2027
D: Outreach to Owners or Operators	<ul style="list-style-type: none"> Conduct targeted outreach to owners or operators in the SLA community, including providing information on best management practices, South Coast AQMD’s Small Business Assistance Program, permitting process, and applicable rules and regulations Conduct outreach to CSC-identified locations to encourage incorporation of best management practices (e.g., United States Environmental Protection Agency (U.S. EPA) Collision Repair Campaign,¹³ U.S. EPA Best Workplace Practices¹⁴) and “Good Neighbor” practices, including seeking feedback from owners or operators 	South Coast AQMD CSC	<ul style="list-style-type: none"> Number of outreach events or materials distributed to auto body shops Number of auto body shops outreached Number of auto body shops that provided feedback, if owners or operators are willing to disclose 	2023	2025

¹³ U.S. EPA, Collision Repair Campaign to Reduce Air Toxics, <https://www.epa.gov/collision-repair-campaign>

¹⁴ U.S. EPA, Best Workplace Practices for Automotive Repair and Fleet Maintenance, <https://archive.epa.gov/epa/saferchoice/best-workplace-practices-automotive-repair-and-fleet-maintenance.html>

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
	regarding their understanding of applicable requirements and/or their willingness to incorporate best management or "Good Neighbor" practices				
E: Air Measurements Survey	Conduct initial air measurements surveys near facilities of concern (as identified under action B) to identify and characterize any potential emissions	South Coast AQMD	<ul style="list-style-type: none"> Number of air measurements surveys Provide updates to the CSC 	2 nd quarter, 2022	2 nd quarter, 2027
F: Focused Facility Enforcement	Conduct door-to-door focused enforcement of potential auto body shops in a CSC-identified area to ensure facilities are properly classified and to verify compliance with applicable rules and regulations	South Coast AQMD	<ul style="list-style-type: none"> Identify area for targeted enforcement inspections Number of inspections Provide updates to the CSC 	2023	2024
G: Rule Amendments	Initiate process to amend Rules 1151 and 1171 to consider including U.S. EPA best management practices as requirements for auto body shops	South Coast AQMD	<ul style="list-style-type: none"> Conduct a review of current practices and use of solvents and update CSC Number of working group meetings held, if necessary 	2023	2 nd quarter, 2027
H: Auto Body Shops Incentives	<ul style="list-style-type: none"> Explore opportunities for incentives for low-VOC paint and coatings and water-based cleaners used at auto body shops within the community Conduct outreach to the CSC when new funding opportunities are available to 	South Coast AQMD	<ul style="list-style-type: none"> Number of identified funding sources for low-VOC paint and coatings and water-based cleaners 	1 st quarter, 2023	2 nd quarter, 2027

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
	incentivize low-VOC paint and coatings and water-based cleaners		<ul style="list-style-type: none"> Total incentive dollars allocated for low-VOC paint and coatings and water-based cleaners As needed, develop and submit Assembly Bill 617 Project Plan(s)¹⁵ Number of incentive outreach actions (e.g., e-mail announcements, participation in expositions) completed 		

¹⁵ CARB, Community Air Protection Incentives, <https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives>