
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, and Manchester Avenue 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

Based on the South Coast AQMD permitting database, there are approximately 89 permitted¹ auto body shops within the SLA community boundary. Permitted auto body shops must comply with the requirements in the permit issued by South Coast Air Quality Management District (South Coast AQMD) as well as any applicable South Coast AQMD rules. South Coast AQMD's permitting program was established to implement the requirements of the federal and state Clean Air Act (CAA), and applicable air quality rules and regulations by specifying operating and compliance requirements for stationary sources that emit air contaminants. 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 481,² 1151,³ 1168,⁴ and 1171.⁵

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

³ 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>

⁴ South Coast AQMD, Rule 1168 – Adhesive and Sealant Applications, <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1168.pdf>

⁵ South Coast AQMD, Rule 1171 – Solvent Cleaning Operations, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1171.pdf>

If vehicles are not present but coating applications are being conducted to metal parts, auto body shops may be subject to Rule 1107.⁶ CARB's Consumer Products Regulation⁷ may apply to the 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. 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 2025.⁸

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. Make referrals from auto body shop inspections to the appropriate agencies to ensure these facilities follow rules and regulations from other 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.⁹
- 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.

⁶ South Coast AQMD, Rule 1107— Coating of Metal Parts and Products, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1107.pdf>

⁷ CARB, Consumer Product Regulation, <https://ww2.arb.ca.gov/our-work/programs/consumer-products-program>

⁸ CARB, Criteria Pollutant and Toxics Emissions Reporting, <https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting>

⁹ South Coast AQMD, Small Business Assistance, <http://www.aqmd.gov/home/programs/business/business-detail?title=small-business-assistance>

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

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 Toxic Substances Control (DTSC), Certified Unified Program Agencies (CUPA), local fire departments) to present information. 	South Coast AQMD	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"> Identify and prioritize locations of concern Conduct enforcement activity 	South Coast AQMD	<ul style="list-style-type: none"> Develop list of identified and prioritized locations of concern, in part using data reporting from CARB’s CTR regulation Number of inspections 	2 nd quarter, 2022	2 nd quarter, 2026
C: Agency Referrals	Refer auto body shops to appropriate agencies when issues are found during inspections that fall outside of South Coast AQMD’s jurisdiction (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	Number of updates from appropriate agencies regarding referrals or follow-up information to the CSC	2 nd quarter, 2022	2 nd quarter, 2027

<p>D: Outreach to Owners and Operators</p>	<p>Conduct targeted outreach to owners and 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</p>	<p>South Coast AQMD CSC</p>	<ul style="list-style-type: none"> • Number of outreach events or materials distributed to auto body shops • Number of auto body shops outreached 	<p>2023</p>	<p>2025</p>
<p>E: Air Measurements Survey</p>	<p>Conduct initial air measurements surveys near facilities of concern (as identified under action B) to identify and characterize any potential emissions</p>	<p>South Coast AQMD</p>	<ul style="list-style-type: none"> • Number of air measurements surveys • Provide updates to the CSC 	<p>2nd quarter, 2022</p>	<p>2nd quarter, 2027</p>
<p>F: Focused Facility Enforcement</p>	<p>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</p>	<p>South Coast AQMD</p>	<ul style="list-style-type: none"> • Identify area for targeted enforcement inspections • Number of inspections • Provide updates to the CSC 	<p>2023</p>	<p>2024</p>