

# CELLY SERVICES INC

ENVIRONMENTAL, HEALTH & SAFETY SERVICES

## DEALER ALERT

**TO:** Bodyshop Manager & Environmental Health and Safety (EHS) Coordinator  
**FROM:** Sam Celly, MS JD CSP REA  
**SUBJECT:** **South Coast AQMD Regulations Rule 1147 Effective 1/1/2010**  
**DATE:** December 18, 2009

South Coast Air Quality Management District is the regulating agency for air quality in the Los Angeles, Orange, Riverside, and the non-desert portions of the San Bernardino County in Southern California. The agency has enacted new rules that apply to body shops regarding system maintenance and documentation. The Rule also covers NOx emissions limits for older (pre-1986) dryers, ovens and afterburners that are located at a collision center paint booth and related equipment.

**SYSTEM MAINTENANCE, RECORDKEEPING AND RATING PLATE:** The maintenance, recordkeeping, and rating requirements are as follows:

- The combustion systems at the collision center will have to be maintained in accordance with the manufacturer's scheduled specifications as outlined in the operating manual or other documentation available from the manufacturer or distributor.
- Maintain on site a copy of the manufacturer's instructions, retain records of maintenance for three years, and retain test records (specified for NOx below) for three years.
- Maintain a rating plate in an accessible location

**NOx EMISSION LIMITS:** Effective July 1, 2010, the owners and operators of the incineration/combustion equipment units manufactured prior to 1986 will have to meet specific NOx limits specified in the table listed in Rule 1147. Table 2 of the Rule 1147 indicates that the NOx emission testing for spray booth (make-up) air heaters manufactured prior to 1998 be conducted by July 1, 2013. Any unit manufactured after 1997 must have emission compliance testing done by July 1 of the year the unit is 15 years old. Rule 1147 can be located at <http://www.aqmd.gov/rules/reg/reg11/r1147.pdf>.

The maintenance company for your booth will provide you with records of maintenance and NOx testing (when applicable). Whether you get notification on Rule 1147 from SCAQMD or not, this Rule applies to you. Keep the records handy for the SCAQMD inspector.

Of note, for those seeking cremation as a final destination, this Rule will make *dying green*. It requires crematories to clean up their emissions as well!

*Authority Cited:* Rule 1147 effective January 1, 2010. Contact at SCAQMD is Kien Huynh at 909-396-2635.

*Sam has been helping automobile dealers comply with EPA & OSHA regulations since 1987. Sam, currently is the Chair of the Law Committee of the American Industrial Hygiene Association (AIHA) and was the past-Chair of the Environmental Issues Committee of the AIHA. Sam has a BS & MS in Chemical Engineering followed by a JD from Southwestern University School of Law. Send your comments to. [sam@cellyservices.com](mailto:sam@cellyservices.com).*

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