CITY OF ALBUQUERQUE

VPMD EXHIBIT
PENGAD 800-631-6989
5b

December 23, 2010

Guy Donaldson
Section Chief, Air Planning Section
EPA Region 6, (6PD-L)
1445 Ross Ave.
Dallas, TX 75202-2733

Re: EPA Region 6 Comments on the Albuquerque Vehicle Pollution Management Division's Draft Revisions to the Vehicle Inspection and Maintenance Rule

Dear Guy

Thank you and your colleagues for the comments on our proposed rule amendments and the clarification provided at the follow-up conference call on December 8th. We have attempted to address your concerns in the revised EPA Review Draft [enclosed]. A point-by-point discussion of your comments and the Vehicle Pollution Management Division's (VPMD) responses are also enclosed. VPMD will propose the revised draft to the Air Quality Control Board on May 11, 2011. Therefore, we respectfully request that EPA review the revised draft and provide comments by February 15, 2011.

Sincerely,

Glen L. Dennis, Division Manager
Vehicle Pollution Management Division
Environmental Health Department

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cc: Sandra Rennie, Air Planning Section
Margaret Nieto, Control Strategies Supervisor, Air Quality Division
Mary Lou Leonard, Director, Environmental Health Department

Division Responses to EPA Comments Regarding Vehicle I & M Revisions

EPA:

"In 20.11.100.1.B.(1) we caution about the change to the exemption for all new motor vehicles from two registration periods to five years following initial registration."

VPMD:

The Division has changed the wording from five years to four years consistent with two registration periods.

EPA:

Expressed concern that Albuquerque's designation status under the forthcoming revised 8-hour ozone standard is unknown and that while the proposed OBD testing of 1998 and newer diesels is commendable it might be best to wait until the standard and associated status is known. The discussion then focused on the revised timeline for the standard and the possibility of incorporating trigger language to account for the unknowns and allow time for a potential weight of evidence demonstration.

VPMD:

The Division has incorporated trigger language in 20.22.100.5B and 20.11.100.17E.(2) which would not require diesel testing until January 1st of the year following adoption of a more stringent ambient air quality standard for ground level ozone.

EPA:

Requested explanation for removal of the term "VEGAS"

VPMD:

The Division explained that it was replaced with the more comprehensive term of "emissions analyzer" to account for OBDII, CAN and gas cap testing capabilities.

EPA:

Expressed concerns on possible impact to the maintenance plan and potential interference with other standards of proposed changes in 20.11.100.14 to change annual test requirement for 1975-1985 model year vehicles back to biennial and remove requirement that 1986 and newer marginal pass vehicles only be issued a one year certificate.

VPMD:

The Division has reinserted language requiring annual re-inspection of all marginal pass vehicles in model years 1975 – 1995 and plans to provide a de-minimus demonstration that this will have the same emission reductions benefits as annual testing of 1975-1985 models.