CITY OF ALBUQUERQUE

VPMD EXHIBIT
5d

April 22, 2011

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

Re: EPA Region 6 Comments dated February 15, 2011 on the Albuquerque Vehicle Pollution Management Division's Draft Revisions to the Vehicle Inspection and Maintenance Rules and the State Implementation Plan (SIP) for Carbon Monoxide.

Dear Guy:

Thank you for your comments and clarification of your office's request for a de-minimus demonstration on the effect of returning 1975-1985 model year vehicles to a biennial test schedule consistent with the City's enabling ordinance. VPMD conducted an analysis of test data which confirmed the effect will be insignificant and easily offset by other proposed enhancements to the test program.

These eleven model years comprise less than 3% of the subject vehicles, their numbers are declining rapidly, and their annual mileage of 3620 miles per vehicle is less than one-fourth that of an average car. There were 8801 such vehicles in 2008 but only 7010 in 2010 for an average attrition of approximately 900 per year. In analyzing the 1954 vehicles that failed in 2010, only 366 or 18% of these vehicles would not have been identified as marginal passes (exceeding 75% of their CO or HC standard) in 2009. The emissions from this small and rapidly declining number of vehicles being driven relatively few miles will be easily offset by applying the marginal pass one year certificate limitation to all 1975-1995 vehicles and by including the rapidly growing number of hybrids in the test program.

Thank you again for your comments and the work of your staff in reviewing the proposed revisions to the inspection and maintenance program here in Albuquerque.

Sincerely,

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

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

PO Box 1293

Albuquerque

NM 87103

www.cabq.gov