VPMD EXHIBIT 4

PENGAD 800-631-6989

Wright, Janice C.

From: Sheri Wible [sheriwible@comcast.net]
Sent: Friday, January 21, 2011 8:26 AM
To: Dennis, Glen
Cc: Nieto, Margaret ; Wright, Janice C.
Subject: RE: Feedback on Vehicle Testing Regulation Changes

Hi Glen,

Thanks for the detailed response. As station operators, we appreciate the ability to provide input to any upcoming changes. We also appreciate your thoughtful consideration and response to our concerns.

I'm quite pleased that there will be language to allow for a stamp or sticker with program manager approval, this really helps us out.

Thanks again!!!

Sheri

From: Dennis, Glen [mailto:GDennis@cabq.gov]
Sent: Thursday, January 20, 2011 11:40 AM
To: sheriwible@comcast.net
Cc: Nieto, Margaret ; Wright, Janice C.
Subject: RE: Feedback on Vehicle Testing Regulation Changes

Hello Sheri,

Thank you for taking the time to attend the stakeholder meeting and to put in writing many of the concerns that we discussed at the meeting. We have incorporated several of your suggestions in the final EPA review draft which can be found at http://www.cabq.gov/airquality/documents/final-epa-review-draft20-11-100nmac12-23-10.pdf.

Specifically, we did add language to allow stations and inspectors to mark, stamp or affix stickers to the official test document with the prior approval of the VPMD program manager.

With respect to mobile test unit permitting, we added language in the regulation to make it clear that the use of such units would be limited to on-site testing of fleets and dealer lots with prior written notice provided to VPMD to allow for meaningful quality assurance and prevent abuse of the restricted permit. Because the units will be restricted to OBDII testing they will not be required to test inside as this requirement was designed to protect the integrity of the gas bench and exhaust sample from 2-speed tests.

Ozone modeling incorporating the proposed changes to exemption years and diesel testing has not been conducted. The Department is pursuing grant funding for extensive ozone modeling but it is unlikely that this would be available in time for the public hearing. However, the original proposed 5-year exemption has been scaled back to 4 years as currently allowed and the language requiring reinspection of marginal pass vehicles after one year has been reinserted. The Division believes the marginal pass limitation will capture the same potential gross polluters that the current annual testing of 1975-1985 model year requirement addresses. Together, the small number and limited annual mileage of the older vehicles that would be exempted make this proposed change insignificant with respect to ozone or carbon monoxide. It should also be noted that these vehicles would still be subject to the smoking vehicle ordinance and citation under the traffic code for visible smoke.

Thank you again for your comments and suggestions. Please feel free to call or write with and additional questions you might have. Glen

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

(505) 764-1110

From: Wright, Janice C.
Sent: Wednesday, November 10, 2010 8:46 AM
To: Dennis, Glen ; Jaramillo, Louis ; Griffin, Donna J.; Nieto, Margaret ; Butt, Neal T.
Subject: FW: Feedback on Vehicle Testing Regulation Changes

Please see the below stakeholder comment.

Thank you,

Janice Campbell Wright
Air Quality Control Board Liaison & Hearing Clerk
City of Albuquerque
768-2601

From: Sheri Wible [mailto:sheriwible@comcast.net]
Sent: Tuesday, November 09, 2010 12:06 PM
To: Wright, Janice C.
Subject: Feedback on Vehicle Testing Regulation Changes

Hi -

Thank you for the meeting to discuss proposed changes to the Vehicle Emission Testing Regulation. Below is a summary of the feedback from Quik Check Emissions:

- Please allow stations some way to mark on the front or back of the VIR for a retest. As discussed in the meeting, if the VIR had a space designated "for station use only", it would work. If you are modifying the VIR, in addition to allowing "station use only" space, you could also consider stating that re-tests can be done for free at 1500 Broadway. (This might solve both issues, allowing stations to stamp for a retest, and also communicates that a retest can be done for free at VPMD.) If you cannot accommodate these changes, please reconsider this restriction. It was suggested that stations could issue coupons for retests. Having the stations issue coupons for a retest is a costly solution. Stations would need to set up and maintain a control system for the coupons. This would likely be cost prohibitive causing stations to eliminate lower rates for retests. If stations cannot mark the VIR for a retest, we would likely charge the same amount as an initial test which would be a disservice to the community. As another option, could this be addressed in the VPMD procedure manual, maybe it is already. If not, this might be the way to handle this issue. Possibly the offending emission tech could be assessed disciplinary points if violated.

- Our greatest concern is the control of semi-mobile testing for licensed automobile dealers.

    - There are many licensed automobile dealers, dealers don't want to test a car unless it is sold, they will promise about anything to sell a car, and cars are sold on Sunday when a mobile test is likely unavailable. What will prevent the automobile dealer from going to the customer anywhere in the city to perform the emission test?

- VPMD resources already carry a big workload with the current # stations and inspectors to audit and regulate. Without additional resources, VPMD regulation of the mobile testers is a concern. How would VPMD regulate and audit the mobile testers? Without adequate VPMD oversight, there is a greater opportunity for abuse.

- Proliferation of mobile testers might also be an unintended consequence. If a dealer that was thinking about getting certified to test but is not, they might decide a mobile unit is worth a try and VPMD could end up with 20 or 30 additional mobile units to monitor. Some of the dealers with the standard set-up may decide to eliminate the garage testers all together.

- We also see an issue with the requirement to conduct the test within a building. How will mobile testers test within a building? How will it be enforced?

- Finally, we have a question regarding the effects the change in the test exemptions will have on the Bernalillo County air shed. As noted in the meeting, there is not a lot of room for errors as far as Ozone levels are concerned. Some vehicles will see reduced testing and some will see increased testing. Has it been modeled so we can be certain to some level of confidence that the additions and subtractions will balance out?

Thank you again for taking stakeholder inputs. Please feel free to contact me (on my cell or email) with questions or clarifications. We are happy to be of any assistance.

Sheri Wible
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Quik Check Emissions
One Stop Emissions and MVD Re-registration @ 6 locations
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