UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

VPMD EXHIBIT
5c

February 15, 2011

Mr. Glen L. Dennis, Division Manager
Vehicle Pollution Management Division
Environmental Health Department
AEHD/Air Quality Division
P.O. Box 1293
Albuquerque, NM 87103

Dear Mr. Dennis:

Thank you for the opportunity to provide comments on the proposed rule amendments. The Environmental Protection Agency (EPA) supports the proposed revisions to the vehicle inspection and maintenance rules. The reorganization and reformatting will make the rules easier to use.

Changing the wording in 20.11.100.1.B.(1) from two registration periods to four years does not change the intent of the approved State Implementation Plan because each registration period is two years; therefore, no demonstration of equivalence will be needed.

Because it is unknown at this time what Albuquerque's designation status will be under the forthcoming reconsidered 8-hour ozone standard, it is prudent to wait to implement the diesel I/M program until the ozone attainment status of the I/M program area is known. Testing diesel vehicles is not outside the scope of the federal I/M requirements. EPA has not undertaken the necessary data gathering to create a model that will project emission reductions from implementation of such a program. Therefore, at this time, it is not possible to use the diesel I/M program to get SIP-creditable emission reductions. However, it may be possible that a diesel I/M program could be part of a "Weight of Evidence" demonstration. We recommend that any such undertaking be coordinated with EPA in advance of its use in this way.

As an alternative, if a program gathered its own data and was able to demonstrate to the satisfaction of the EPA that a certain amount of SIP emission reduction credits could be attributed to its diesel I/M program, then that credit may be accepted for a SIP revision. Again, we strongly recommend that the City work closely with EPA if it decides to pursue such an effort.

We do not object to deleting the term "VEGAS" in 20.11.100.7 and 20.11.100.25 [struck] because we understand that the replacement term, emissions analyzer, is a more

comprehensive term that includes current technologies such as OBDII, CAN, and gas-cap testing capabilities.

Changing the one year inspection schedule for 1975-1995 vehicles that emit close to the maximum allowable standard in 20.11.100.14 may keep the intent of the approved SIP intact. However, in order for this revision to be approvable into the SIP, under § 110(l) of the Clean Air Act, EPA needs a de-minimus demonstration showing how this will have the same emission reduction benefits as annual testing of all 1975-1985 models.

If we may be of any assistance to you in the development of these rule revisions, please contact me at 214-665-7242, or Sandra Rennie of my staff at 214-665-7367.

Sincerely,

Guy Donaldson, Chief
Air Planning Section