

RESPONSE TO MO DNR EMISSIONS I/M WHITE PAPER, DATED OCTOBER 27, 2005

Larry P. Egley

Overall Comment: I believe the above referenced White Paper accurately reflects and records the varied opinions and decisions reached during the I/M Control Strategy sessions at the four workgroup sessions held by Missouri DNR in the St. Louis Region during the summer of 2005.

Inspection Fees for OBD II Vehicles: In paragraph 8 on page 9 of the White Paper, it is reported that the participants "did not discuss an inspection cost structure." Therefore, this remains an open issue that I would like to address. Among the objections of vehicle owners to the current program is that the \$24 test fee is far too high. I suggest this concern will escalate sharply when testing shifts exclusively to OBD II vehicles in the redesigned test environment.

Under the proposed redesign, there are several major factors that should be taken into consideration with regard to the OBD II Inspection fee:

- (1) The OBD II inspection is fast and simple. GCAP reports in its literature that the OBD II test takes only approximately 2 minutes. My experience during inspections of my personal OBD II-equipped vehicles confirms that standard.
- (2) The equipment required to conduct OBD II inspections is much less expensive than the equipment formerly required for the BAR 90 tailpipe tests for decentralized testing in the late 1990's (and the fee was nevertheless less than half of \$24 at times!).
- (3) Currently, part of the justification for the \$24 fee can be that the fee includes funding for (a) the

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Under our proposed redesign, 1995 and older vehicles will no longer be subject to tailpipe emissions tests after August 2007. Furthermore, 1996 and newer vehicles (OBD II) will ALSO not be subject to emissions tests - only to "systems" tests. This means, as currently proposed, there will actually be no regular or formal "emissions" tests for vehicles in the St. Louis Region after August 2007. I suggest it might be well to have some provision for (actual) emissions testing to identify OBD II vehicles that are heavily polluting in the St. Louis Region and take appropriate action.

Furthermore, I believe dirty screening could provide the only effective protection against tampering. Anytime the owner of a vehicle who has modified his emissions system brings his vehicle to a station for a required test, he can first return the system to its original configuration. After the test, the owner can "re-modify" the system until his next required inspection. This pattern would be thwarted if the vehicle's pollution were detected by remote sensing and then emissions inspectors would subsequently pay a surprise visit to the home of the vehicle owner. I believe such surprise visits would also provide mouth-to-mouth publicity, which, in the long term, would be quite effective in discouraging tampering.

Remote Sensing for Fleet Analysis: It should be acknowledged that the participants recommended that remote sensing be effected under the new design for purposes of fleet analysis (paragraph 5

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The cost of this contract modification should be relatively modest for the following reasons: (1) It would (finally) be the last year of the contract, and (2) it would involve only approximately 35% - 40% of the fleet by that time. I suggest the cost would be approximately \$6 million, which is only a fraction of what complete suspension would have cost 2 years ago (for the entire fleet).

Note: I suggest administrative policy during the "phase out transition" period during the final months of the I/M240 tests will be very challenging indeed.

Transition to Decentralized Free Market: While I support the concept of decentralization, I suggest the "hybrid" concept of test and repair proposed in our redesign (paragraph 4, page 6) may result in a very complicated "shake out" among the private entities. Any establishments which initially elect NOT to do all: (1) safety/repair (2) emissions test and (3) emissions repair may find that one of the standard complaints about the current program is the inconvenience of three stops. While fraud-resistance may be provided by test only, I suspect most vehicle owners do not understand this and will focus on convenience. I suggest the private entities might be encouraged by the State to provide ALL services initially OR that the State allow the private entities (if qualified) to add a service(s) (safety, emissions test, emissions repair) within a very short time frame after implementation.

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