Public Hearings for Reconsideration of the 2008 National Ambient Air Quality Standards for Ozone

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Good Morning Ladies and Gentlemen,

First of all, I would like to start by thanking The Environmental Protection Agency for giving us the opportunity to express our opinion and comments about the proposed revision of the National Ambient Air Quality Standards for Ground-level Ozone. As a member of the Inspection and Maintenance (I/M) Industry, and on behalf of CITA, the International Motor Vehicle Inspection Committee, DEKRA America supports the new proposed revision of Air Quality Standards. We believe that these new regulations are necessary to help insure a cleaner and safer environment for our future and the future of our children. DEKRA has been in the inspection business for almost 100 years servicing people and the environment around the world. We understand the effects and consequences that ground level ozone has on people and the environment. Literature and scientific research states that one of the main emitters of pollutant gas such as Nitrogen Oxides or NOx and Volatile Organic Compounds or VOC's are vehicles. As a result, the commitment of the I/M Industry lies not solely in making cars safer, but also cleaner.

The I/M Industry has rolled out very effective and innovative programs to curve the output of vehicle emission. For example the I/M program in the Atlanta area tests on average 2.3 million cars a year. The projected emissions reduction in 2009 for metro Atlanta alone was 316 tons of carbon monoxides, 19 tons of VOCs (volatile organic compounds) and 19 tons of NOx per day.[1] Georgia's management contractor, Georgia's Clean Air Force has identified and repaired more than 1.5 million heavy polluting vehicles." As you may imagine, similar success stories can be found in many other metropolitan regions where vehicle emissions is an ongoing health hazard to the citizens of these areas.

Besides, the conventional I/M programs that reduce emissions, there are abundant other initiatives to gear America into a cleaner future. These initiatives include Ride-Share programs, Public Relations campaigns to inform the public on air issues and educational programs on proper vehicle maintenance. Air Check Texas, the program administrator in Texas, introduced a program titled *Drive a Clean Machine* that provides assistance to remove 10 years or older vehicles with failed emission tests from Texas

[1] Information provided by Pam Earl, Program Manager of the Mobile & Area Sources Program GA EPA

roadways.[2] This self-funded program gives subsidies to eligible low income vehicle owners which enables them to move into newer and cleaner vehicles.

The moving public may argue that some of these programs are inconvenient due to the cost and time associated with emission testing. Even this argument was taken into consideration by the I/M Industry: Technology innovations, such as OBDII testing and other alternative programs help reduce motorist inconvenience and helping to keep costs down.

No doubt, the revision of the National Ambient Air Quality Standards for Ground-level Ozone will create new challenges for program administrators. One may ask how practical new or adjusted programs are to meet the new standards. As mentioned earlier, the I/M Industry has a proven track record on how to implement programs efficiently, cost effectively and quickly; therefore it can be argued that the industry has the competence and experiences to successfully tackle these challenges. An example of meeting the new standards could be to expand existing emission test programs into suburban areas, where the moving public heavily commutes into the regions with high pollution rates. Another, more essential example is the integration of diesel operated heavy trucks into already existing federal annual safety inspection programs.

Heavy trucks make up the majority long-distance highway user, driving more than 120 thousand miles a year. Trucks use about 14 billion gallons of gasoline and 23 billion gallons of diesel fuel annually. Heavy trucks alone, excluding smaller commercial vehicles, are responsible for about 3 million tons of NOx emissions annually.[3] The influx of commercial vehicles in metro areas causes an increase of emission pollution. According to a study by Oak Ridge National Laboratory, about 25 thousand trucks drive through Knoxville, TN daily and contribute 40% of NOx emissions in that area.[4] There are new regulations for new trucks to meet certain emission standards and several states have implemented annual emission inspection programs to oversee and control emission output caused by commercial vehicles. Nevertheless, in order to meet the new National Ambient Air Quality Standards for Ground-level Ozone, a nationwide test program

[2] http://www.tceq.state.tx.us/implementation/air/mobilesource/vim/driveclean.html
[3] "Estimation of Fuel Use by Idling Commercial Trucks", TRB 85th Annual Meeting Washington, DC 01/26/2006
[4] "Truck Emission"; ACF News Source; www.acfnewsource.org/science/truck_emissions.html

should be rolled out, maybe in combination with the FMCSA periodic safety inspection program section 396, 17 though 23.

To summarize, the I/M Industry has proven to be the most effective way to reduce ground level ozone. Its programs are a vital source to identify and repair gross polluting vehicles. Technology innovations and inclusion of heavy truck testing could be a logical way to help further reduce harmful pollutants being added to our atmosphere.

In conclusion, there are significant points of the proposed revision that has direct impact on the economy. Firstly, in metro Atlanta alone, inspection providers employ more than 2500 certified inspectors and this number would increase if the program is expanded into new areas and/or with the addition of heavy diesel vehicle testing. Most of the programs service providers are small businesses that use this program to create employment opportunities, and economic growth. During the state of the Union address on January 27, 2010, President Barak Obama made clear how important small business success is to the U.S. economy: "We should start where most new jobs do –- in small businesses; when an entrepreneur takes a chance on a dream, or a worker decides it's time she became her own boss. Through sheer grit and determination, these companies have weathered the recession and they're ready to grow." [5] The proposed revision would give many small businesses the opportunity to expand and grow.

Secondly, tougher policies on air pollution force other industries to utilize cleaner energy. Increased investments into clean energy would lead to more innovations, advancement in technology and a cleaner environment but also to economic strength. Referencing again President Obama, he stated the effect of clean energy on the economy as follows: "because the nation that leads the clean energy economy will be the nation that leads the global economy. And America must be that nation."[6]

On behalf of DEKRA America, CITA and the Inspection and Maintenance Industry, I would like to thank you for your time and the opportunities that lie ahead.

[5] http://www.whitehouse.gov/the-press-office/remarks-president-state-union-address

[6] http://www.whitehouse.gov/the-press-office/remarks-president-state-union-address