

The following informal supplemental comments on the draft EPA clean screening guidance were sent to EPA by the state of Arizona.

1. Although vehicle emissions profiling does deplete the emissions data in a state where the method is used, so do model year exemptions and remote sensing. For our Clean Screen Pilot Program, the model by Radian is essentially a low emitter profile, which uses remote sensing identification as the "trigger". When the model is tested, the low emitter profile is actually more effective without the remote sensing trigger than with it.
2. I am not aware of any data that indicates that a remote sensing clean screening program will incentivize vehicle owners to conduct vehicle maintenance on a continuous basis and enhance the "M" component of I/M Programs. This appears to be an assumption that is an expected result. This could act as an incentive for vehicle owners to swap license plates on vehicles to obtain a clean screen exemption. If we are going to assume that vehicle owners are going to spend their time and increase their maintenance efforts, they may also spend their time trying to work the system. Likewise, on the second page of RSTi's comments, it is their opinion that a vehicle owner is more likely to not repair a vehicle under a LEP or MY Exemption program, but this can be offset somewhat by having a high emitter identification program.
3. Regarding the comments on reducing the chance of a vehicle's owner to identify an emissions failure within the warranty period (for Model Year exemptions), we recently adopted the model year exemption (current model year plus previous four model years). Under this exemption, the vehicle owner has the option to either test the vehicle or accept the exemption. Therefore, the exemption does not prohibit a vehicle owner from identifying an emission problem. Additionally, this problem can be partially offset by a high emitter identification program.
4. All clean screening options "deplete the pool of emissions data which is necessary to evaluate the performance of emissions control devices", including remote sensing clean screening. RS Clean Screened vehicles are not being I/M tested either.
5. Regarding over-inclusive emitter profiling and under-inclusive emitter profiling and model year exemptions, our Clean Screen Pilot report by Radian, Table ES-1 indicates that at the 50% screening percentage, about 30% of the dirty vehicles were identified as "clean" (e.g., RS clean screen false passes). Depending upon how you look at it, this would appear to be over-inclusive as well.

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