



**Testimony of**  
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**Pennsylvania Department of Transportation**  
**Roundtable Forum on Exempting Eligible Counties from Vehicle Emissions Testing**  
**Senate Transportation Committee**  
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Good morning. My name is Kurt Myers, and I am the Deputy Secretary for PennDOT's Driver and Vehicle Services. On behalf of Secretary of Transportation Leslie Richards, I appreciate the opportunity to testify today on the operational requirements of Pennsylvania's Vehicle Emissions Inspection Program.

The current vehicle emissions inspection program in the 25 counties in the Commonwealth was approved, in October 2005, by the EPA as a revision to Pennsylvania's State Implementation Plan (SIP) submitted by the Pennsylvania Department of Environmental Protection (DEP).

Pennsylvania's vehicle emissions inspection program is required for approximately 7 million subject vehicles registered in designated vehicle emissions inspection counties and requires testing of 1975 and newer model year vehicles that are gasoline-powered and less than 9,000 pounds gross vehicle weight rating.

As noted earlier, 25 of the 67 counties in Pennsylvania have some form of vehicle emissions testing. The emissions inspection program as it stands today was developed by DEP through a negotiated resolution of litigation brought by Citizens for Pennsylvania's Future and the Clean Air Council, two environmental advocacy groups. Tailored to meet Pennsylvania's specific air quality improvement needs, the operational requirements of the program were deployed by the Department of Transportation.

While the counties in the program are bound by federal and state law, Pennsylvania's emission testing program was designed with specific test types for each affected region to meet the air quality needs of each region.

In the Philadelphia Region (Bucks, Chester, Delaware, Montgomery and Philadelphia counties) subject vehicles require a gas cap integrity test and a visual check of emissions components for 1975 through 1993 model year vehicles. Subject vehicles 1994 through 1995 model year receive a gas cap integrity test, visual check of emissions components and an idle test to measure exhaust emissions using a dynamometer (a treadmill-like device) to simulate driving conditions. Subject

vehicles for 1996 and newer model years receive a gas cap integrity test and an onboard diagnostic (OBD) test using the vehicle's computer. Subject vehicles weighing 8,501-9,000 pounds and of the model year 1996 and newer receive a gas cap integrity test, visual check of emissions components and an idle test to measure exhaust.

In the Pittsburgh Region (Allegheny, Beaver, Washington, and Westmoreland counties) subject vehicles require a gas cap integrity test and a visual check of emissions components for 1975 through 1993 model years. Subject vehicles for 1994 through 1995 model years receive a gas cap integrity test, a visual check of emissions components and an idle test to measure exhaust emissions. The 1996 and newer vehicles receive a gas cap integrity test and an OBD test using the vehicle's computer. Subject vehicles weighing 8,501-9,000 pounds and of the model year 1996 and newer receive a gas cap integrity test, visual check of emissions components and an idle test to measure exhaust.

In the South-Central Region (Berks, Cumberland, Dauphin, Lancaster, Lebanon, Lehigh, Northampton and York counties) subject vehicles that are 1975 through 1995 model years receive a gas cap integrity test and a visual check of emissions components; vehicles that are 1996 and newer model years receive a gas cap integrity

test and an OBD test using the vehicle's computer. Subject vehicles weighing 8,501-9,000 pounds and of the model year 1996 and newer receive a gas cap integrity test and a visual check of emissions components.

In the Northern Region (Blair, Cambria, Centre, Erie, Lackawanna, Luzerne, Lycoming and Mercer counties), subject vehicles 1975 model year and newer receive a gas cap integrity test and a visual check of emissions components. Vehicles weighing 8,501-9,000 pounds and of the model year 1996 and newer receive a gas cap integrity test and a visual check of emissions components.

In 42 counties where an emissions program is not required, cars and light trucks receive a visual inspection as part of the safety inspection to detect tampering with pollution control devices.

As additional information, there are several key components of the Vehicle Emissions Program in Pennsylvania that I would like to note. Each of these components is applicable to the four regions mentioned earlier.

At the successful completion of the testing sequence on each subject vehicle, the official inspection station must affix an IM inspection certificate to the windshield to

prove compliance. Additionally, the Department deploys Quality Assurance Officers to conduct covert and overt audits of the participating IM inspection stations.

Performance audits occur on a regular basis to determine whether the inspectors are correctly performing all tests and required functions properly and that all repairs are made by certified repair technicians. PennDOT regulations define sanctions for non-compliant activities to include fines and suspensions of certifications to perform IM inspections, up to and including termination of services.

Vehicles driven less than 5,000 miles during the 12-month period immediately preceding the inspection and which have been owned by the same owner for one year or more are exempt from emissions testing but still require a sticker from an inspection station.

A new vehicle, being titled and registered for the first time and which has less than 5,000 total miles on the odometer is exempt for one year but still requires a sticker from an inspection station.

A vehicle owner may qualify for a waiver of the requirement to pay for certain emission control system repairs if the subject vehicle has failed the initial emission inspection, qualifying repairs of at least \$150 have been made, and the subject vehicle

has failed the retest. The expenditure includes the cost of any necessary parts and the labor as performed by a qualified emission repair technician.

The current program management fee of \$1.57 is collected by the program vendor from the station for performing initial emissions tests. This fee is provided to the emissions program vendor to maintain and manage the data transmission to ensure accurate data collection and enforcement of the program. Test data links specific test results to a specific vehicle, IM program registrant, test site, inspector and are used to determine whether the correct testing parameters were observed for the specific vehicle in question. This analysis distinguishes compliant and non-compliant vehicles when compared with the registration database, screens inspection stations and inspectors, and is used to investigate possible irregularities and ensure the program effectiveness.

The IM equipment specifications for the OBD and gas cap check were recently updated by PennDOT. The existing equipment has been in operation in many cases since December 2003 and the software is difficult to support. Technology has changed dramatically since 2003, when the specifications were last modified. New equipment will meet today's technology standards and ensure the continued security and integrity of the inspection network. Updates to equipment specifications are

required to keep the On-Board Diagnostic (OBD) and gas cap check current and to enable transmission of data to PennDOT's program vendor. Equipment costs range from approximately \$3,950 to \$6,250, with options to purchase, finance, or rent. Monthly rental/lease fees can range from an estimated \$95 to \$164 monthly. Station participation in the emissions program is voluntary.

Finally, I would like to share the statutes and regulations that govern the Vehicle Emissions Inspection Program.

Chapters 45 and 47 of the Vehicle Code addresses certain aspects of the Commonwealth's emissions inspection program. Specifically, Chapter 45 contains statutes that govern exhaust systems and emission control systems. Chapter 47 establishes and governs the inspection requirements for vehicles. Chapter 47 gives the Department not only the authority to establish a system of safety inspections of vehicles, but also the authority to promulgate regulations to implement the emission inspection program.

The emission inspection regulations are in Chapter 177 of Title 67 of the Pennsylvania Code. The state has four I/M regions, which are described in Sections 177.3 and 177.51(d). These regions are as follows: The Philadelphia Region consists

of Philadelphia, Bucks, Chester, Delaware, and Montgomery Counties; the South-Central Region consists of Berks, Cumberland, Dauphin, Lancaster, Lebanon, Lehigh, Northampton and York Counties; the Pittsburgh Region consists of Allegheny, Beaver, Washington and Westmoreland Counties; and the Northern Region consists of Blair, Cambria, Centre, Erie, Lackawanna, Luzerne, Lycoming and Mercer Counties.

The emission test requirements for the Philadelphia, South Central, Pittsburgh and Northern Regions are set forth in Section 177.51.

I would be pleased to take any questions from the committee at this time.