State of New Jersey
Department of Environmental Protection

Christine Todd Whitman
Governor

Robert C. Shinn, Jr.
Commissioner

February 26, 1998

William Muszynski
Deputy Regional Administrator
United States Environmental Protection Agency
Region II
290 Broadway - 26th Floor
New York, New York 10007-7866

Dear Deputy Regional Administrator Muszynski:

Enclosed for your review please find a proposed revision to New Jersey's inspection and maintenance (I/M) State Implementation Plan (SIP). The purpose of this proposed SIP revision is to: 1) clarify the inspection frequency during the transition period between the State's basic I/M program and full implementation of its enhanced I/M program; 2) quantify the emission reduction losses anticipated from this test frequency modification; and, 3) provide an equivalency demonstration showing the State plan to offset these losses in emission reduction benefit.

Specifically, the State plans to modify its basic I/M program test frequency from annual to biennial during the transition period between full implementation of its basic and enhanced I/M programs. This modification is needed to accommodate the decreased availability of centralized inspection lanes while they are being retrofitted for enhanced testing. The State has determined that reducing the demand for inspection during the transition period by modifying the basic I/M program's test frequency is the most effective, and least disruptive, way to expedite the enhanced retrofit process without impeding the on-going requirements of the basic I/M program.

The State has determined that this modification of its basic I/M program test frequency during the transition period will cause an increase in volatile organic compound (VOC) and carbon monoxide (CO) emissions. Pursuant to the General Savings Clause (Section 193) of the Clean Air Act (42 U.S.C. 7515), "No control requirement...in effect before [November 15,1990]...may be modified ...unless the modification insures equivalent or greater emission reductions...." As such, to offset any increase in VOC emissions, the State will add to the basic I/M program a test to check the functional operation of a vehicle's fuel cap. The State plans to offset any minimal increase in carbon monoxide emissions by using the emission reductions gained from vehicle fleet turnover not already taken credit for in the State's plans.

It is my understanding that the United States Environmental Protection Agency 's (USEPA) approval of this proposed SIP revision is needed prior to the federal highway approval which would allow the State to open the bids to begin implementation of its enhanced I/M program.

Since the USEPA has already taken action against the State by disapproving its 15 percent rate of progress (ROP) plans due to delays in the implementation of its enhanced I/M program[†], any further delays in the implementation of this program need to be avoided. Consistent with 40 C.F.R. Part 51, App. V, ¶2.3.1(a), the State requests that the USEPA propose the approval of this proposed SIP revision by parallel processing. To this end, the State has already been in consultation with your staff to assist in an the expedited approval of this proposed SIP revision.

By February 28, 1998 (that is, 30 days prior to the pubic hearing), the State will have complied with the federal notice of public hearing requirements set forth at 40 C.F.R. §51.103(d) by: 1) notifying the public of a hearing on the proposed SIP revision through legal advertisement; 2) making the proposed SIP revision available for public inspection throughout the State; and, 3) notifying the neighboring states within the Ozone Transport Region of the State's proposed SIP revision. A miscellaneous notice announcing: 1) the availability of this proposed SIP revision, and 2) the public hearing regarding this proposed SIP revision, will appear in the March 2, 1998 New Jersey Register. The State's will hold its hearing on this proposed SIP revision on Tuesday, March 31, 1998 beginning at 10:00 a.m. in the Main Lobby Public Hearing Room of the New Jersey Department of Personnel building, 44 S. Clinton Avenue, Trenton, New Jersey. Written comments on this proposed SIP revision will be accepted until Friday, April 3, 1998.

I would like to express my gratitude to you and your staff for your guidance and assistance in the preparation of this SIP revision. If you have any questions concerning the enclosed documentation, please feel free to contact me or John Elston, Administrator of my Office of Air Quality Management, at (609)292-6710.

Sincerely,

Robert C. Shinn, Jr.
Commissioner

Enclosure

[†] Letter dated December 12, 1997 to Commissioner Robert C. Shinn, Jr., New Jersey Department of Environmental Protection (NJDEP) and Commissioner John J. Haley, Jr., New Jersey Department of Transportation (NJDOT), from Deputy Regional Administrator William J. Muszynski, P.E., USEPA, Region II. A similar, but less detailed letter, was sent on the same day to New Jersey Governor Christine Todd Whitman from Regional Administrator Muszynski.

c: Governor Christine Todd Whitman
John Valeri, Assistant Council, Governor's Office
Commissioner John J. Haley, Jr. NJDOT
C. Richard Kamin, NJDMV
Gary Mariano, NJDMV
Ronald Borsellino, USEPA Region II, Air Programs Branch

bc: Administrator John Elston, NJDEP
Bureau Chief Chris Salmi, NJDEP
Bureau Chief David M. West, NJDEP
Kate Watson, NJDEP
Felice Weiner, NJDEP

The State of New Jersey
Department of Environmental Protection

Revision to the
State Implementation Plan (SIP)
for the Inspection and Maintenance (I/M) Program for the
State of New Jersey

February 25, 1998

Preface

This document revises the State's inspection and maintenance (I/M) State Implementation Plan (SIP). Specifically, the purpose of this SIP revision is to clarify the inspection frequency during the transition period between the basic program and the full implementation of the enhanced inspection program.

Acknowledgments

The New Jersey Department of Environmental Protection (NJDEP) acknowledges the efforts and assistance of the many agencies and individuals whose contributions were instrumental in the preparation of this enhanced I/M SIP revision. In particular, the NJDEP wishes to acknowledge the many individuals within the New Jersey Department of Transportation (NJDOT), the New Jersey Division of Motor Vehicles (NJDMV), the United States Environmental Protection Agency (USEPA) Region II, and the staff within the NJDEP for their assistance and guidance.

Table of Contents:

List of Tables:

List of Appendices:

Acronyms and Abbreviations:

CO	Carbon monoxide
FIP	Federal Implementation Plan
gpm	grams per mile
HC	Hydrocarbons
I/M	Inspection and Maintenance
MY	Model Year
NHSDA	National Highway System Designation Act
NJDEP	New Jersey Department of Environmental Protection
NJDMV	New Jersey Division of Motor Vehicles
NO_x	Oxides of Nitrogen
RFP	Request for Proposal
ROP	Rate of Progress
SIP	State Implementation Plan
tpd	tons per day
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds

Executive Summary

The purpose of this document is to revise the State's inspection and maintenance (I/M) State Implementation Plan (SIP) to clarify the frequency of vehicle inspections during the transition period between the existing basic I/M program and full implementation of the enhanced I/M program. The existing basic program requires vehicles to be inspected every year, or annually. The enhanced program, when fully implemented, will require vehicles to be inspected every two years, or biennially. During the transition between the two programs, the State will require vehicles to be inspected biennially, rather than annually, to accommodate the decreased availability of centralized inspection lanes while they are being retrofitted for enhanced testing. As the enhanced program is phased in, New Jersey motorists will have the option to obtain an enhanced test at those facilities which are retrofitted and capable of performing such a test. However, once the enhanced I/M program is fully implemented (that is, once sufficient inspection lanes capable of enhanced testing are available), enhanced testing will be mandatory for all applicable vehicles.

The modification of the test frequency of the basic I/M program during this transition is estimated to result in an increase in volatile organic compound (VOC) and carbon monoxide (CO) emissions. Pursuant to the General Savings Clause (Section 193) of the Clean Air Act (42 U.S.C. 7515), "No control requirement...in effect before ...[November 15,] 1990...may be modified ...unless the modification insures equivalent or greater emission reductions...." As such, to offset any increase in VOC emissions, the State will add to the basic I/M program a test to check the functional operation of a vehicle's fuel cap. Malfunctioning fuel caps result in emissions of VOCs from evaporation from the vehicle's evaporative emission control system. The State plans to offset any minimal increase in CO emissions by using the emission reductions gained from vehicle fleet turnover not already taken credit for in the State's plans. As of 1994, all air quality monitors in New Jersey and adjacent areas demonstrate compliance with the carbon monoxide health standard.

I. Introduction:

A. Background

Inspection and maintenance (I/M) programs are an integral part of New Jersey's, and many other states's, plans to meet and maintain compliance with ambient air quality health standards. The importance of an I/M program is due primarily to the fact that today's motor vehicles depend heavily on properly functioning emission control systems to maintain low emission levels. Any major malfunction in these emission controls can cause substantial increases in emissions from the vehicle. Since many of these malfunctions would not impede driveability, the vehicle's owner could continue to operate the vehicle without knowing it was generating excess emissions. Therefore, the main purpose of an I/M program is to ensure that in-use motor vehicles are properly maintained.

In New Jersey, there are approximately 5.17 million registered vehicles which travel an estimated 62 billion miles on New Jersey's roadways each year. Realizing the importance of motor vehicles' contribution to New Jersey's ambient air quality, New Jersey initiated operation of a vehicle emission inspection in 1974. This basic I/M program, which was the first of its kind in the nation, requires that all non-exempt gasoline-fueled motor vehicles be inspected annually using an idle exhaust emission test. As vehicle emission control technology improved, additional design elements were made to the State's basic program, such as inspections for the presence of a catalytic converter and the possible use of leaded gasoline, which reduces the effectiveness of the vehicle's catalytic converter. Even given these program additions, the advent of computer controlled vehicle operating systems has revealed that the basic I/M program detects only the most egregious polluters.

Congress recognized this fact in 1990 and required states with certain levels of unhealthy air quality, like New Jersey, to enhance their inspection programs. These in-use enhanced programs were designed to detect vehicles operating outside of the acceptable levels under more realistic driving conditions. In addition, these programs would inspect any excess emission of oxides of nitrogen (NO_x), a pollutant which was not inspected for as part of any state's basic inspection program. NO_x, along with volatile organic compounds (VOC), are precursors to the formation of ground level ozone.

B. Purpose

The Clean Air Act required the USEPA to promulgate national standards for the implementation of enhanced I/M programs. New Jersey submitted its plan to meet these standards in June of 1995 and subsequently augmented its plan in March of 1996. The USEPA granted conditional interim approval of the State's enhanced I/M plan in May of 1997. The purpose of this SIP revision is to clarify the testing frequency during the transition between the basic I/M program and the full implementation of the enhanced I/M program.

During the transition, existing inspection stations will be retrofitted to allow for enhanced testing. This will require the staggered closings of centralized inspection lanes, rendering them unavailable for vehicle inspections. In the past, when staff shortages limited the availability of

inspection lanes, the motoring public became very dissatisfied with the State's inspection program. Specifically, during the short time period in the State's inspection history when centralized lanes could only operate at 70 percent capacity, waiting times reached three (3) hours or more during peak inspection periods. Public outcry over this inconvenience was such that additional personnel were hired to insure a minimum of 95 percent operating capacity[1]. Since the enhanced I/M program is a cornerstone of the State's air quality plans to attain the ozone health standard and maintain compliance with the CO health standard, public acceptance of the program is critical.

The State's basic I/M program design is outlined in its basic I/M State Implementation Plan and its subsequent revisions. The State submitted a SIP on June 29, 1995[2], and a subsequent revision to that SIP on March 27, 1996[3], which together outlined the State's design for its enhanced I/M program. These SIP revisions are discussed in greater detail in Section II below. Although these SIP revisions clearly defined the testing frequency of both New Jersey's basic and enhanced I/M programs, they do not definitively specify the testing frequency during the transition period between these two programs. The State has determined that during this transition period it will begin operating its basic I/M program on a biennial, rather than annual, test frequency.

Modifying the basic I/M program test frequency to biennial during the transition period will decrease the number of vehicles requiring inspection by 35 percent annually[4]. If a vehicle enters an inspection lane which has been retrofitted, the vehicle owner will be given the option of receiving the enhanced tests, if applicable, or the basic I/M test. If the owner chooses the enhanced test option, and fails this inspection, the basic test, which will continue to be the State's official inspection test procedure, will be administered to determine inspection compliance. However, regardless of which test is administered during the transition period, a two year inspection sticker will be given to any vehicle which successfully passes inspection. In addition to clarifying the basic I/M program's test frequency during the transition period, this SIP revision also quantifies the emission reduction losses anticipated from this modification and provides an equivalency demonstration showing the State plan to offset these losses in emission reduction benefit.

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[1] Letter dated February 6, 1998 from Gary D. Mariano, Acting Director, Consumer Services, New Jersey Division of Motor Vehicles to Rudy Kapichak, Mobile Source Team Leader, USEPA, Region II explaining New Jersey's need to move from an annual to a biennial basic inspection program during the transition period.

[2] Attached to a letter dated June 29, 1995 from the NJDEP Commissioner Shinn to the Regional Administrator, USEPA, Region II.

[3] Attached to a letter dated March 27, 1996 from the NJDEP Commissioner Shinn to the Regional Administrator, USEPA, Region II.

[4] Letter dated February 6, 1998 from Gary D. Mariano, Acting Director, Consumer Services, New Jersey Division of Motor Vehicles to Rudy Kapichak, Mobile Source Team Leader, USEPA, Region II explaining New Jersey's need to move from an annual to a biennial basic inspection program during the transition period.

II. Previous SIP Revisions

A. Basic I/M SIP

In 1974, New Jersey, under commitments made in its basic I/M SIP, began mandatory enforcement of its basic I/M program. The State's basic I/M SIP consists of an annual inspection program whereby all gasoline-fueled motor vehicles, unless specifically exempt through law or regulation, are subject to an idle exhaust emission test. Although several subsequent revisions have been made to this basic I/M SIP, the core of the program has remained unchanged. Major changes in the State's basic I/M program over time include: 1) the addition of a visual inspection for the presence of a catalytic converter, 2) the addition of an inlet restrictor test to determine whether a vehicle's fuel inlet was sufficiently narrow to preclude use of a leaded gasoline nozzle, thereby preventing the use of leaded fuel, and 3) modification of the program network design to allow for private inspection facilities. This third major change expanded the inspection facility network to include non-state operated inspection facilities which could do both inspections and repairs. Although these private facility were originally only allowed to perform reinspections, their responsibilities were soon augmented to included initial inspection as well. Today, approximately 32 percent of the vehicle fleet subject to mandatory inspection receives their inspection stickers from a private inspection facility.

B. Enhanced I/M SIP - June 29, 1995

On June 29, 1995, New Jersey submitted a SIP to the USEPA which described its enhanced I/M program design. This SIP described an inspection program whereby all 1981 and newer gasoline fueled motor vehicles, unless specifically exempt through law or regulation, would be subject to a steady-state dynamometer-based exhaust emission test known as the ASM5015. In addition, these same vehicles would receive pressure and purge tests designed to detect any malfunctions within the vehicle's evaporative emission control system. All pre-1981 vehicles would continue to be subject to the idle exhaust emission test, as they are under the State's basic I/M program. New Jersey's enhanced I/M SIP also accounted for a hybrid (i.e., centralized, test-only and decentralized, test-and-repair) inspection network, similar to the one established for New Jersey's basic I/M program. This SIP stated that, in accordance with the NJDEP rules at N.J.A.C. 7:27-15.5(b), once the enhanced I/M program was fully implemented, all subject motor vehicles would be inspected at least once every two years (i.e., biennially).

C. Enhanced I/M SIP Revision - March 27, 1996

On March 27, 1996, New Jersey submitted a revision to its June 29, 1995 enhanced I/M SIP, modifying its enhanced I/M program design to take advantage of the additional flexibility afforded states by Congress in designing their enhanced I/M programs. Specifically, the National Highway System Designation Act of 1995, P.L. 104-59 [S.440], (NHSDA) prohibited the USEPA from automatically discounting decentralized program formats by 50 percent, as had previously been prescribed in the USEPA's final rule on I/M program requirements[5]. Rather, the NHSDA allowed states to claim any reasonable amount of credit for their decentralized programs

[5] 40 C.F.R. §51.353, 57 Fed. Reg. 52990 (November 5, 1992).

that they deemed appropriate, so long as 18 months from the approval of their enhanced I/M SIP the State could show full implementation enhanced I/M program data substantiating their credit claim. Consistent therewith, as part of its March 27, 1996 enhanced I/M SIP revision, New Jersey claimed 80 percent credit for the decentralized portion of its enhanced I/M program.

Also as part of this March 27, 1996 revision to the State's enhanced I/M SIP, the test frequency of the State's current inspection process was slightly modified in connection with an enhanced demonstration phase. During this demonstration phase, vehicles which successfully passed a voluntary enhanced emission test would receive an inspection sticker valid for two years. Thus, the March 27, 1996 SIP revision allowed for biennial enhanced inspections prior to full mandatory implementation of the enhanced I/M program. However, all pre-1981 vehicles and other vehicles which did not take and pass the enhanced I/M test, would continue to be inspected annually using the basic I/M test.

On May 14, 1997, the USEPA granted conditional interim approval to New Jersey's enhanced I/M SIP[6]. This conditional interim SIP approval, which became effective on June 13, 1997, addressed both the State's original June 29, 1995 enhanced I/M SIP submittal and its subsequent March 27, 1996 SIP revision. New Jersey subsequently satisfied the conditions of this approval by rectifying the two major deficiencies in its enhanced I/M SIP identified by the USEPA (New Jersey cured the first major enhanced I/M SIP deficiency by providing final and complete test equipment specifications, test procedures and emission standards to the USEPA by January 31, 1997[7]; and cured the second major enhanced I/M SIP deficiency by providing enhanced I/M performance standard modeling to the USEPA by February 1, 1998[8]). Although New Jersey must still cure eight (8) de minimis deficiencies identified by the USEPA by December 13, 1998, the satisfaction of these de minimis deficiencies does not affect the USEPA's interim approval[9].

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[6] 40 C.F.R. §52, 62 Fed. Reg. 26401 (May 14, 1997).

[7] These documents were submitted as an attachment to a letter dated January 31, 1997 from Commissioner Robert C. Shinn, Jr., New Jersey Department of Environmental Protection, to Jeanne M. Fox, Regional Administrator, USEPA, Region II.

[8] This modeling and its supporting documentation were submitted as an attachment to a letter dated January 30, 1998 from Commissioner Robert C. Shinn, Jr., New Jersey Department of Environmental Protection to William J. Muszynski, P.E., Deputy Regional Administrator, USEPA, Region II.

[9] 61 Fed. Reg. 56172 (October 31, 1996).

III. SIP Clarification

A. Need for SIP Clarification

As stated previously, New Jersey's basic I/M program test frequency is annual. However, in its final rule governing the requirements for inspection and maintenance (I/M) program implementation, the USEPA allowed for states to implement their enhanced I/M programs on schedules other than annual, so long as the states could continue to meet required emission reduction targets[10]. As such, New Jersey determined that the test frequency of its enhanced I/M program would be biennial (that is, all subject vehicles would be inspected a minimum of once every two years). By only requiring vehicle owners to have their vehicles inspected once every two years, New Jersey created a more convenient, cost-effective enhanced inspection program design for motorists. In addition, as demonstrated by the State's recent performance standard modeling submittal to the USEPA, the State's biennial enhanced I/M program design is capable of achieving equivalent, or lower, emission levels than the USEPA annual "model" enhanced I/M program[11].

Although the State's enhanced I/M SIP and its revision articulate what the inspection test frequency will be once the enhanced I/M program is fully implemented, neither SIP clearly specified the test frequency for the transition period from basic to enhanced inspection programs. The State's June 29, 1995 enhanced I/M SIP discussed the need for a transition period[12]. Specifically, the SIP, in discussing the retrofitting of pre-existing centralized inspection facilities for enhanced testing, makes the assumption that centralized facilities will need to be closed during the retrofitting process, on a staggered basis, to insure motorist safety and to expedite retrofit completion. These closings will result in a shortage of centralized inspection facilities available to conduct annual basic inspections. The State will have to compensate for this shortage to maintain an official inspection program during the retrofit process.

The State has determined that reducing the demand for inspections during this transition period by modifying the basic I/M program's test frequency from annual to biennial is the most effective, and least disruptive, way to address this anticipated shortage in centralized testing facilities. Biennial inspection will allow the State to avoid lengthy waiting times during the transition/retrofit process and insure the safety of the public and vehicle inspectors during construction. This testing frequency modification will result in 65 percent of the State fleet eligible for inspection being required to have an annual basic inspection during this period. The reduction in the demand for inspections should allow the State to shut down centralized facilities for retrofitting without impeding the on-going requirements of the basic inspection program.

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[10] 40 C.F.R.§51.355(a), 57 Fed. Reg. 52991.

[11] The State's performance standard modeling and supporting documentation was attached to a letter dated January 30, 1998 from Robert C. Shinn, Jr., Commissioner, NJDEP to William Muszynski, Deputy Regional Administrator, USEPA, Region II.

[12] State of New Jersey State Implementation Plan (SIP) for the Control of Mobile Source Ozone Air Pollution, June 29,1995, Section 5--Test Frequency and Convenience (Section 51.355), page 32.

In addition to allowing for a smoother, expedited retrofit process to the enhanced I/M program, modifying the basic I/M program's test frequency to biennial will make the inspection process uniform. That is, all vehicles will be inspected on a biennial basis, rather than some vehicles being inspected biennially while others continue to receive annual inspections. This uniformity will ease NJDMV's transition to the biennial enhanced I/M program, once it is mandatory. The State believes that this uniformity will also increase public acceptance for the new enhanced I/M program by fostering familiarity with a biennial inspection frequency and acquainting the public to the new testing procedures on a voluntary basis.

B. State Authority to Modify Test Frequency

The Director of the NJDMV, pursuant to N.J.S.A. 39:8-2b(1), has the authority to establish, by rulemaking, inspection test frequency. This section of Title 39 goes on to statutorily establish a biennial test frequency, without distinguishing between the basic and enhanced inspection programs, and further allows the Director of NJDMV to modify this testing schedule to evenly distribute the volume of inspections. As such, the NJDMV established in rulemaking at N.J.A.C. 13:20-43.7 test frequency requirements providing that motor vehicles be inspected biennially unless otherwise provided for by law or regulation. A copy of N.J.A.C. 13:20-43.7 is provided in Appendix III. The State has determined that its decision to modify the test frequency of its basic I/M program from annual to biennial for the transition period is allowed under NJDMV statute and regulations and requires no further NJDMV rulemaking. Likewise, the NJDEP does not have to modify its regulations governing I/M programs to allow for biennial basic inspections. The NJDEP regulations at N.J.A.C. 7:27-15.5 call for vehicles to be inspected at least every two years (i.e., biennial inspection is the minimum requirement).

C. Schedule for Implementation of Test Frequency Modification

The transition period will begin on the start date of the contract for the implementation of the enhanced I/M program and will end when the enhanced I/M program becomes mandatory. At the onset of this transition period, the vehicles subject to inspection will change. Currently, all vehicles are subject to inspection annually. During the transition period, and subsequently during the enhanced I/M program, vehicles will be inspected on a biennial basis. The methodology used to transition from annual to biennial vehicle inspections will be based on the model year of the vehicle.

Specifically, the initial inspection for vehicles currently registered in New Jersey will be as follows: 1) during even years, even model year vehicles will be required to be inspected, and 2) during odd years, odd model year vehicles will be required to be inspected. For example, in 1998, even model year vehicles (i.e., 1992, 1994, etc.) will be subject to inspection during their prescribed month, and in 1999, odd model year vehicles (i.e., 1991, 1993, etc.) will be subject to inspection during their prescribed month. For pre-owned vehicles which are being registered upon change of ownership, and vehicles being registered in New Jersey for the first time, an initial vehicle inspection will be required within 14 days of registering with the State, with biennial inspections from the initial inspection month taking place thereafter. The public will be made aware of this methodology for selecting vehicles for inspection during the transition period through media releases, registration mail inserts and handouts and bulletins at NJDMV inspection stations and agencies. It is believed that this methodology will result in no emissions

bias during each biennial period. If an emissions bias were identified, the State of New Jersey is committed to rectifying this situation in consultation with the USEPA.

IV. Equivalency Demonstration

A. Quantifying Emission Increases from Test Frequency Modification

Modifying the State's basic I/M program's test frequency from annual to biennial would result in an increase in VOC and CO emissions because only 65 percent of the vehicle fleet, rather than the entire fleet, would be inspected, and subsequently repaired, if necessary, annually for that period of time. The State's basic I/M program does not inspect vehicle for excess NO_x emissions, as will be done under the enhanced I/M program. Therefore, although NO_x emission will likely increase due to the basic I/M program test frequency modification, the State cannot quantify this increase and is not required, under the Clean Air Act General Saving Clause, to offset any increase in NO_x emissions due to the program modifications. To quantify the VOC and CO emission reduction benefit losses, the NJDEP conducted mobile modeling using the MOBILE5a-H mobile source emission factor model. The State's analysis quantifying these losses is described in detail in Appendix I. The input and output files and the spreadsheet including calculations are contained in Appendix II.

For modeling purposes, the State assumed that the transition period would end on January 1, 2000. In reality, the State anticipates that this transition period will end well before January 2000. However, the worst case scenario was chosen to demonstrate to the USEPA that the State could offset the emission increases even should delays expand the transition period well beyond the timeframe anticipated by the State.

This modeling analysis shows that modifying the basic I/M test frequency from annual to biennial during the transition period will increase VOC emission by 0.026 grams per mile (gpm) and CO emissions by 0.365 gpm. Therefore, in order to make this modification, the State needs to demonstrate that it can make up these losses in emission reduction benefit through other means.

B. Need to Compensate for the Loss in Emission Reduction Benefit

Pursuant to 42 U.S.C. §7515, any control requirement in effect prior to the enactment of the Clean Air Act Amendments of 1990, and in an area which is in nonattainment for any air pollutant, cannot be modified unless the modification insures equivalent or greater emission reductions of such air pollutants. New Jersey is in nonattainment for ozone and portions of the State are still designated as nonattainment for carbon monoxide, although the region including the relevant portions of New Jersey, New York and Connecticut has demonstrated compliance with the NAAQS for carbon monoxide since 1994. In addition, New Jersey's basic I/M program has been in effect since 1974. Therefore, modifications to the State's basic I/M program which in anyway reduce the effectiveness of the program must offset the loss due to the modification. As discussed in Subsection A, the State's determination to modify the test frequency of its basic I/M program from annual to biennial will cause an increase in both VOC and CO emissions. The

remainder of Section IV discusses the State's demonstration of equivalency for offsetting the losses in VOC and CO emission reduction benefits.

C. VOC Equivalency Demonstration

To compensate for the loss in VOC emission reduction benefit from modifying the basic I/M program's test frequency, New Jersey plans to: 1) begin administering fuel cap pressure tests as part of its basic I/M program in its centralized inspection facilities, and 2) begin fuel cap/evaporative emission control system visual inspections, hereafter referred to as visual inspections, as part of its basic I/M program in its decentralized inspection facilities. In accordance with N.J.A.C. 15.5(f)6, all vehicles originally equipped with a sealed fuel filler cap are required to have a functional fuel cap pressure test. However, in an attempt to alleviate any unnecessary additional financial burden on the private inspection community which will be purchasing the equipment necessary for the enhanced tests, the decentralized facilities will be allowed to perform visual inspections only for the duration of the transition period. This does not mean that the State is prohibiting decentralized inspection facilities from purchasing approved fuel cap pressure testing equipment and performing the test during this transition period. However, the State believes that most decentralized facilities will wait and purchase the entire enhanced inspection equipment package, which includes equipment for performing fuel cap pressure tests. Therefore, for modeling purposes, the State has assumed that none of the decentralized inspection facilities will perform a full fuel cap pressure test during the transition period.

Once the enhanced I/M program is fully implemented, all 1981 and newer model year vehicle, regardless of where they are inspected, will begin receiving a full evaporative pressure test. The evaporative pressure test, in addition to pressure testing the fuel cap, will evaluate the vehicle's entire evaporative system for leaks. Likewise, all pre-1981 vehicles which were originally equipped with a sealed gas cap, regardless of where they are inspected, will be required to receive the fuel cap pressure test as part of the enhanced I/M program.

Centralized Inspection Facilities:

In the State's centralized facilities, a fuel cap pressure test will be given to all vehicles which were originally equipped with a sealed fuel filler cap. The NJDEP has determined that most pre-1970 model year vehicle were not equipped with sealed fuel filler caps, while most 1970 and newer model year vehicles were equipped with sealed fuel filler caps. For modeling purposes, it was assumed that all 1970 and newer vehicles would receive the fuel cap pressure test as part of the basic inspection. This testing will begin no later than the start dated of the enhanced I/M contract, when the switch to biennial basic inspection occurs. However, the State expects to begin the fuel cap pressure tests and visual inspections as early as possible to gain additional credit to offset the losses in emission reductions due to the delayed implementation of the enhanced I/M program. The fuel cap pressure test involves attaching the fuel cap to a flow test device, pressurizing the testing device and then determining the fuel cap leak rate. Due to the nature of the fuel cap pressure test, a visual inspection of the fuel cap (to determine the presence or absence of the fuel cap) is automatically performed and credit for this visual

inspection is included in the modeling to determine the benefits of fuel cap testing in the centralized inspection facilities.

Implementation of the fuel cap pressure test in the centralized lanes as part of the State's basic I/M program will result in a 0.033 gpm reduction in VOC emissions. The State's analysis to quantify the emission reduction benefits from implementing the fuel cap pressure test in the centralized inspection facilities is described in detail in Appendix I. The input and output files and the spreadsheet used to compute off-model calculations are contained in Appendix II. This VOC emission reduction more than offsets the 0.026 gpm VOC loss in emission reduction benefits that will be experienced by modifying the basic I/M test frequency to biennial. As such, the State has demonstrated that implementation of fuel cap pressure testing in the centralized lanes as part of the basic I/M program will result in more than enough VOC emission reductions to offset the emission increase resulting from the modification to its basic I/M program test frequency. See Table I in Section V for a summary of the VOC equivalency demonstration.

Decentralized Inspection Facilities:

The State's decentralized inspection facilities will begin performing visual inspections on all vehicles which were originally equipped with a sealed fuel filler cap as part of the basic I/M program. As with the fuel cap pressure test, for modeling purposes, it was assumed that all 1970 and newer vehicles would be subject to this inspection.

The visual inspection which will be performed in the decentralized inspection facilities will require more than just determining whether or not the fuel cap is present. The visual inspection of the gas cap will consist of the following: 1) an examination to determine if the fuel cap properly fits in place and, 2) an examination of the fuel cap for obvious signs of wear or leakage. Fuel caps with cracked, split or missing gaskets, vent holes drilled out or any obvious cracks or holes in the cap which might permit gasoline vapors to escape will be rejected. In addition to this fuel cap visual inspection, a separate visual inspection of the vehicle's evaporative emission control system will take place during the transition period in all decentralized inspection facilities. The visual inspection of evaporative emission control system will consist of an examination to determine if an evaporative canister is present and all vapor lines are intact and connected. Any vehicle with a missing canister, disconnected or improperly connected vapor lines or vapor lines which have cracks or splits which may leak will be rejected.

Implementation of a visual inspections in the decentralized facilities as part of the State's basic I/M program gives the State no measurable "modeled" reduction in VOC emissions. The State's analysis to quantify the emission reduction benefits from implementing fuel cap inspections in the decentralized inspection facilities is described in detail in Appendix I. The input and output files and the spreadsheet used to compute off-model calculations are contained in Appendix II.

Since the VOC emission reductions expected from implementation of the centralized fuel cap pressure test more than offsets the loss in VOC emissions reduction benefits that will be experienced by modifying the basic I/M test frequency to biennial, the State has

fulfilled its requirements to demonstrate VOC equivalency. See Table I in Section V for a summary of the VOC equivalency demonstration. However, the State believes that, although no measurable emission reductions would be demonstrated through modeling, these decentralized visual inspections will result in some actual emission reductions, if only from replacing missing fuel caps. Therefore, the State will implement these visual inspections in the decentralized lanes as part of its basic I/M program no later than the start date of the States's enhanced I/M contract.

D. Possible Use of Excess VOC Emission Reductions

On December 12, 1997, the USEPA took action against New Jersey by disapproving its 15 percent rate of progress (ROP) plans due to the realization that the benefits claimed for the State's enhanced I/M program would not be obtained[13]. This disapproval started both a sanction process (2:1 offsets for new or modified stationary sources followed by federal highway approval and funding restrictions) and a Federal Implementation Plan (FIP) process for New Jersey. In order to stop the sanctions process and FIP actions, New Jersey needs to: 1) submit revised 15 percent ROP plans which include adopted State regulations that provide for the necessary emission reductions; and, 2) notify the USEPA that the State has begun implementation of its enhanced I/M program. In addition, the USEPA would need to officially approve these plans in a Federal Register notice.

For New Jersey to submit revised plans which provide for the necessary emission reductions, it has to account for the 45 tons per day (tpd) of VOC emission reductions that were originally claimed as reductions which would be realized from the implementation of the State's enhanced I/M program. The State may choose to use the excess in VOC emission reductions from the implementation of the fuel cap pressure test, 0.007 gpm, towards this 45 tpd shortfall to remedy the State's disapproved 15 percent rate of progress (ROP) plans. See Table I in Section V for a summary of the VOC equivalency demonstration and the excess VOC emission benefits expected to be obtained through the administration of a fuel cap pressure test as part of the basic I/M program.

E. CO Equivalency Demonstration

New Jersey plans to offset the loss in CO emission reduction benefit from modifying the basic I/M program test frequency by using the emission reduction benefits gained from vehicle fleet turnover which have not already been claimed by the State in its carbon monoxide SIP[14].

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[13] Letter dated December 12, 1997 to Commissioner Robert C. Shinn, Jr., NJDEP and Commissioner John J. Haley, Jr., New Jersey Department of Transportation, from Deputy Regional Administrator William J. Muszynski, P.E., USEPA, Region II. A similar, but less detailed letter, was sent on the same day to New Jersey Governor Christine Todd Whitman from Regional Administrator Muszynski.

[14] The New Jersey State Implementation Plan (SIP) Revision for the Attainment and Maintenance of the Carbon Monoxide National Ambient Air Quality Standard, November 17, 1994. The State, on July 10, 1997, proposed a revision to this SIP (The New Jersey Proposed State Implementation Plan (SIP) Revision for the Attainment and Maintenance of the Carbon

Vehicle fleet turnover is the phenomena whereby newer vehicles with more advanced emission controls ultimately replace older, less advanced vehicles within the State fleet.

The NJDEP quantified the carbon monoxide benefits gained through vehicle fleet turnover from January 1, 1996 through January 1, 1998 at 0.745 gpm. The State's analysis to quantify the emission reduction benefits gained from vehicle fleet turnover since January 1, 1996 is described in detail in Appendix I. The input and output files and the spreadsheet used to compute off-model calculations are contained in Appendix II. The CO emission reduction benefits obtained from fleet turnover exceed the loss in CO emission reduction benefits incurred from modifying the State's basic I/M program test frequency to biennial and remain below the budget levels previously established by the State. See Table I in Section V for a summary of the CO equivalency demonstration.

V. Conclusion

As demonstrated in Section IV and summarized in Table I below, the State is capable of offsetting the loss in emission reduction benefits incurred from modifying its basic I/M program's test frequency from annual to biennial. Therefore, upon the start date of the State's enhanced I/M contract, New Jersey's basic I/M program will become a biennial program. This biennial basic inspection program will remain in effect until the mandatory biennial enhanced I/M program is fully implemented.

TABLE I: Summary of Emission Equivalency Demonstration

	VOC (gpm)	CO (gpm)
Loss due to Modification	0.026	0.365
Gain due to Fuel Cap Inspections[†]	0.033	N/A
Excess due to 1996 through 1998 vehicle fleet turnover	N/A	0.743
Excess Benefits	0.007	0.377

[†] This is a combination of the gain in emission reductions due to both centralized fuel cap pressure tests/fuel cap visual inspections and decentralized visual inspections.

Monoxide National Ambient Air Quality Standard--Attainment Demonstration and Maintenance Plan for the New Jersey Portion of the New York-Northern New Jersey-Long Island Carbon Monoxide Nonattainment Area). A hearing on this proposal took place on August 11, 1997 and the comment period closed on August 20, 1997. The State has taken no further action on this proposal.

The State of New Jersey
Department of Environmental Protection

Revision to the
State Implementation Plan (SIP)
for the Enhanced Inspection and Maintenance (I/M)
Program for the State of New Jersey

Appendix I: Modeling Descriptions and
Off-Model Calculations

February 25, 1998

Table of Contents:

List of Tables:

Acronyms and Abbreviations:

BIM	Basic Inspection and Maintenance Program
CO	Carbon Monoxide
EIM	Enhanced Inspection and Maintenance Program
EF	Emission Factor
gpm	grams per mile
NJDEP	New Jersey Department of Environmental Protection
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds

I. Introduction

The purpose of this appendix is to demonstrate how the State quantified: 1) the anticipated losses in volatile organic compound (VOC) and carbon monoxide (CO) emission reduction benefits from modifying the State's basic I/M (BIM) test frequency from annual to biennial, 2) the VOC emission reduction benefits anticipated from implementing fuel cap pressure testing in the centralized inspection facilities as part of the BIM, 3) the VOC emission reduction benefits anticipated from implementing visual inspections of the fuel cap and evaporative emission control system in the decentralized inspection facilities as part of the BIM, and 4) the carbon monoxide emission reduction benefits from vehicle fleet turnover since January 1996. In addition, this document clearly shows how the State determined that it could more than offset the anticipated emission reduction losses from modifying its BIM test frequency.

II. Losses in Emission Reduction Benefits Due to BIM Test Frequency Modification

A. Modeling Runs

The State analyzed the impact of modifying the BIM test frequency from annual to biennial on the program's ability to reduce VOC and carbon monoxide emission separately. Eight (8) modeling scenarios were needed to determine the loss in VOC emission reduction benefits, and four (4) modeling scenarios were needed to determine the loss in carbon monoxide emission reduction benefits. Table I shows the major modeling parameters for each scenario.

TABLE I: Modeling Scenarios to Determine Modification Impact

	VOC			CO		
	Test Frequency	Network Type	Evaluation Year	Test Frequency	Network Type	Evaluation Year
Run 1	annual	centralized	July 1999	annual	centralized	Jan. 2000
Run 2	biennial	centralized	July 1999	biennial	centralized	Jan. 2000
Run 3	annual	decentralized	July 1999	annual	decentralized	Jan. 2000
Run 4	biennial	decentralized	July 1999	biennial	decentralized	Jan. 2000
Run 5	annual	centralized	July 2000	---	---	---
Run 6	biennial	centralized	July 2000	---	---	---
Run 7	annual	decentralized	July 2000	---	---	---
Run 8	biennial	decentralized	July 2000	---	---	---

B. Calculations

Step 1: Adjust the VOC Emission Factors (EFs) to determine January 2000 VOC emission factors[1]

- Equation 1 is used to determine January 2000 VOC emission factors

Equation 1:

$$EF_{jan00} = \frac{(EF_{july99} + EF_{july00})}{2}$$

Where:
EF_{jan00} = Adjusted VOC Emission Factor for January 2000;
EF_{july99} = VOC Emission Factor for July 1999, and;
EF_{july00} = VOC Emission Factor for July 2000.

- This equation results in four adjusted VOC EFs (annual centralized, annual decentralized, biennial centralized and biennial decentralized). Table II give the resultant adjusted VOC EFs for January 2000. This Table also provides the modeled carbon monoxide Emission Factor for January 2000 (which required no further adjustments).

TABLE II: January 2000 VOC and CO Emission Factors in grams per mile (gpm)

EF Description	Adjusted VOC EF	CO EF
Annual Centralized	1.840	20.487
Annual Decentralized	1.930	22.111
Biennial Centralized	1.871	20.922
Biennial Decentralized	1.946	22.328

[1] The wintertime fuel parameters assumed by the model in a January run produce inaccurate summer VOC emission factors. Therefore, to determine accurate summer VOC emission factors for January 1, 2000, the NJDEP modeled for July 1, 1999 and July 1, 2000 and then took the average of those emission factors as the VOC emission factor for January 1, 2000.

Step 2: Determine composite emission factors for the basic I/M program

- A composite Emission Factor represents the vehicle emissions from the entire BIM network design (both the centralized and decentralized portions of the program). As such, the composite Emission Factor accounts for New Jersey's 68/32 BIM hybrid network (that is, 68 percent of the vehicles receive their inspection stickers from centralized inspection facilities, while the remaining 32 percent receive their inspection stickers from decentralized inspection facilities)[2].

- Equation 2 was used to determine the composite emission factors for the BIM program.

- Use of Equation 2 results in two composite emission factors each for VOC and carbon monoxide (January 2000 annual and January 2000 biennial).

Equation 2:

$$CompositeEF=(EF_d*0.32)+(EF_c*0.68)$$

Where:
EF_d = Decentralized Emission Factor, and;
EF_c = Centralized Emission Factor.

Note: For both VOC and carbon monoxide, the values for EF_d and EF_c are found in Table II.

- Table III gives the resultant composite emission factors for each scenario.

TABLE III: January 2000 Composite Emission Factors in gpm

EFs Description	VOC Composite EF	CO Composite EF
Annual Program	1.869	21.007
Biennial Program	1.895	21.372

[2] This hybrid network split was derived by the NJDMV from the inspection reports it receives from both the centralized and decentralized inspection centers in New Jersey.

Step 3: Determine Emission Benefit Loss

- Equation 3 is used to determine the loss in benefit from modifying its basic I/M test frequency from annual to biennial.

Equation 3:

$$Loss = bEF_{jan00} - aEF_{jan00}$$

Where:

Loss = the loss in benefit as of January 2000;
bEF_{jan00} = Biennial Composite Emission Factor for January 2000, and;
aEF_{jan00} = Annual Composite Emission Factor for January 2000.

- This equation is used twice; once to determine the VOC loss (using the composite VOC EFs from Table III) and a second time to determine the loss for carbon monoxide (using the composite carbon monoxide EFs from Table III). Table IV gives the resultant VOC and carbon monoxide losses due to a modification from annual to biennial basic inspections during the interim between the State's basic and enhanced I/M programs.

TABLE IV: Losses Due to the Modifying the Basic I/M Program Test Frequency

	VOC (gpm)	CO (gpm)
Emission Benefit Loss	0.026	0.365

III. Emission Benefits Gained from Centralized Fuel Cap Pressure Testing

A. Modeling Runs

Implementation of the fuel cap pressure test as part of the State's basic I/M program will be implemented occur in the centralized lanes. Due to the nature of the fuel cap pressure test, a fuel cap visual inspection (to determine the presence or absence of a fuel cap) is automatically included. The combination of these inspections in the centralized lanes will hereafter be referred to as the "fuel cap pressure test." Repairs made due to failure of a fuel cap pressure test will result only in VOC emission reductions; these repairs will not impact any increase in carbon monoxide emissions resulting from the BIM test frequency modification. To determine the benefits of administering fuel cap pressure tests in the centralized lanes, six (6) modeling scenarios were generated. Table V shows the major modeling parameters for each scenario.

TABLE V: Modeling Scenarios to Determine Benefit of Centralized Fuel Cap Pressure Test

	Test Frequency	Network Type	Evaporative Pressure Test†	Fuel Cap Visual Inspection	Evaluation Year
Run 1	Biennial	Centralized	yes	yes	July 1999
Run 2	Biennial	Centralized	no	no	July 1999
Run 3	Biennial	Centralized	yes	yes	July 2000
Run 4	Biennial	Centralized	no	no	July 2000
Run 5	Biennial	Decentralized	no	no	July 1999
Run 6	Biennial	Decentralized	no	no	July 2000

† The fuel cap pressure test cannot be modeled separately; it can only be modeled as part of the entire evaporative pressure test.

- Please note that Runs 2, 4, 5 and 6 in Table V are the same as Runs 2, 6, 4, and 8 in Table I (Section I), respectively. The only new runs generated are the ones which account for the administering of evaporative pressure tests/fuel cap visual inspections in the centralized lanes (Runs 1 and 3 above).

B. Calculations

Step 1: Adjust the VOC EFs to determine January 2000 VOC emission factors

- Equation 1 (Section I) is used to determine the January 2000 VOC EFs.

- Table VI lists the resultant adjusted VOC EFs for January 2000.

TABLE VI: January 2000 VOC Emission Factors in gpm

EF Description	Adjusted VOC EFs
Centralized EF including "evaporative tests"†	1.751
Centralized EF excluding "evaporative tests"	1.871
Decentralized EF	1.946

† "evaporative tests" refer to the full evaporative pressure test and fuel cap visual inspection in the centralized facilities only.

Step 2: Determine composite VOC emission factors.

- Composite emission factors are determined using Equation 2 (Section I).

- The January 2000 decentralized EFs is used twice in determining the overall program EFs with and without centralized "evaporative benefits."

- This step will result in two (2) composite EFs (a January 2000 Emission Factor including the centralized "evaporative benefits" and a January 2000 Emission Factor excluding those benefits).

- Table VII below gives the resultant composite VOC emission factors for each scenario.

TABLE VII: January 2000 Composite VOC Emission Factors in gpm

EFs Description	VOC EFs
EF including centralized "evaporative tests"†	1.813
EF excluding centralized "evaporative tests"	1.895

† "evaporative tests" refer to the full evaporative pressure test and fuel cap visual inspection in the centralized facilities only.

Step 4: Determine the composite VOC Emission Factor which accounts for fuel cap pressure testing only in the centralized lanes

- The USEPA has stated that the fuel cap pressure test accounts for 40 percent of the full pressure test benefit[3]. Therefore, Equation 4 is used to determine the VOC Emission Factor from administering only the fuel cap pressure test, rather than the entire evaporative pressure test, in the centralized facilities as part of the basic I/M program.

Equation 4:

$$EF_{fc}=EF_{noe}-[(EF_{noe}-EF_{e})*0.40]$$

Where:
EF_{fc} = the VOC Emission Factor accounting for administering only the fuel cap pressure test and the fuel cap visual inspections in the centralized facilities, rather than the entire evaporative pressure test, as part of the BIM ;
EF_{e} = Biennial Composite Emission Factor w/ full evaporative benefits, and;
EF_{noe} = Biennial Composite Emission Factor w/out full evaporative benefits.

NOTE: The values for EF_{e} and EF_{noe} are found in Table VII.

- This equation results in a VOC Emission Factor of 1.862 gpm. This Emission Factor represents a BIM program in which the centralized inspection facilities are performing a fuel cap pressure test/visual fuel cap inspection and the decentralized inspection facilities are not performing either of these inspections.

Step 5: Determine Fuel Cap Benefit in Centralized Facilities

- Equation 5 is used to determine the overall emission benefits from implementing the fuel cap pressure test in the centralized lanes only as part of the BIM.

[3] 40 C.F.R. 52, 62 Fed. Reg. 26402 (May 14, 1997).

Equation 5:

$$Benefit = EF_{noe} - EF_{fc}$$

Where:
EF_{noe} = Biennial Composite VOC Emission Factor w/out full evaporative benefits, and;
EF_{fc} = Biennial Composite VOC Emission Factor accounting for administering only the fuel cap pressure test and the fuel cap visual inspections in the centralized facilities, rather than the entire evaporative pressure test, as part of the BIM.

- A 0.033 gpm VOC benefit is expected from fuel cap pressure testing in the centralized facilities as part of the basic I/M program.

IV. Emission Benefits Gained from Decentralized Visual Inspections

A. Modeling Runs

Implementation of visual inspections of the vehicle's fuel cap and evaporative emission control system, hereafter referred to as the "visual inspections", as part of the State's basic I/M program will occur in the decentralized lanes. The purpose of these visual inspections is not only to determine the presence or absence of a fuel cap, but also to determine the visual integrity of the fuel cap and the evaporative emission control system. However, no pressurization of the fuel cap will occur in the decentralized facilities as part of the basic I/M program. Repairs due to failure of these visual inspections will result in VOC emission reductions only ; these repairs will not impact the increased carbon monoxide emissions due to modifying the BIM test frequency to biennial. To determine the benefits of administering visual inspections in the decentralized lanes, six (6) modeling scenarios were generated. Table VIII shows the major modeling parameters for each scenario.

TABLE VIII: Modeling Scenarios to Determine Benefit of Decentralized Visual Inspections

	Test Frequency	Network Type	Fuel Cap Pressure Test	Fuel Cap Visual Inspection	Evaluation Year
Run 1	Biennial	Decentralized	no	yes	July 1999
Run 2	Biennial	Decentralized	no	no	July 1999
Run 3	Biennial	Decentralized	no	yes	July 2000
Run 4	Biennial	Decentralized	no	no	July 2000
Run 5	Biennial	Centralized	no	no	July 1999
Run 6	Biennial	Centralized	no	no	July 2000

- Please note that Runs 2, 4, 5 and 6 in Table VIII are the same as Runs 4, 8 2 and 6 in Table I (Section I), respectively. The only new runs generated are the ones which account for visual inspections in the decentralized lanes (Runs 1 and 3 above).

B. Calculations

Step 1: Adjust the VOC EFs to determine January 2000 VOC emission factors

- Equation 1 (Section I) is used to determine adjusted VOC EFs for January 2000.

- Table IX lists the adjusted VOC EFs for January 2000.

TABLE IX: January 2000 Adjusted VOC Emission Factors in gpm

EF Description	Adjusted Composite VOC EFs
Decentralized EF including visual inspections†	1.946
Decentralized EF excluding visual inspections	1.946
Centralized EF	1.871

† "visual inspections" refer to the fuel cap and evaporative emission control system visual inspections in the decentralized facilities only.

Step 2: Determine composite emission factors

- Composite emission factors are determined using Equation 2 (Section I).

- The January 2000 centralized Emission Factor is used twice in determining the overall program EFs with and without decentralized visual inspections.

- This step will result in two composite EFs (a January 2000 Emission Factor including the benefits of visual inspections in the decentralized facilities, and a January 2000 Emission Factor excluding those benefits).

- Table X gives the resultant composite VOC emission factors for each scenario.

TABLE X: January 2000 Composite VOC Emission Factors in gpm

EFs Description	VOC EFs
EF including decentralized "visual inspections"†	1.895
EF excluding decentralized "visual inspections"	1.895

† "visual inspections" refer to the fuel cap and evaporative emission control system visual inspections in the decentralized facilities only.

Step 3: Determine Visual Benefit in Decentralized Facilities

- Equation 6 is used to determine the benefit from visual inspections in the decentralized facilities as part of the basic I/M program.

Equation 6:

$$Benefit = EF_{vfc} - EF_{novfc}$$

Where:
EF_{vfc} = Biennial Composite Emission Factor w/ visual benefits, and;
EF_{novfc} = Biennial Composite Emission Factor w/out visual benefits.

Note: Values for EF_{vfc} and EF_{novfc} are found in Table X.

- No modeled emission benefit is expected from performing visual inspections in the decentralized facilities as part of the basic I/M program.

V. Carbon Monoxide Emission Reduction Benefit from Fleet Turnover

A. Modeling Runs

-To determine the carbon monoxide emission benefits attributable to vehicle fleet turnover since January 1996, four (4) modeling scenarios were considered. Table XI shows the major modeling parameters for each scenario.

TABLE XI: Modeling Scenarios to Determine Carbon Monoxide Benefit from Fleet Turnover

Modeling Run	Test Frequency	Network Type	Evaluation Date
Run 1	Annual	Centralized	January 1996
Run 2	Annual	Decentralized	January 1996
Run 3	Annual	Centralized	January 1998
Run 4	Annual	Decentralized	January 1998

B. Calculations

Step 1: Determine composite carbon monoxide emission factors

- Composite carbon monoxide Emission Factors are determined using Equation 2 (Section I).

- This step will result in two composite carbon monoxide Emission Factors (one for January 1996 and one for January 1998).

- Table XII gives the resultant composite carbon monoxide Emission Factors for each scenario.

TABLE XII: January 2000 Composite Carbon Monoxide Emission Factors in gpm

EFs Description	CO EFs
January 1996 EF	22.298
January 1998 EF	21.555

Step 2: Determine carbon monoxide Emission Benefit from Fleet Turnover

- Equation 7 is used to determine the carbon monoxide benefit from vehicle fleet turnover between January 1996 and January 1998.

Equation 7:

$$Benefit = EF_{jan96} - EF_{jan98}$$

Where:
Benefit = the benefit of carbon monoxide vehicle fleet turnover between 1/96 and 1/98;
EF_{jan96} = Annual Composite carbon monoxide Emission Factor for January 1996, and;
EF_{jan98} = Annual Composite carbon monoxide Emission Factor for January 1998.

Note: Values for EF_{jan96} and EF_{jan98} are found in Table XII.

- The State has obtained 0.734 gpm of carbon monoxide emission reductions from vehicle fleet turnover since January 1996.

VI. Results and Conclusion

Table XIII below is a summary which includes: 1) losses expected from modifying New Jersey's BIM test frequency to biennial, 2) the anticipated VOC emission reductions expected from administering fuel cap pressure tests/fuel cap visual inspections in the centralized facilities and from administering fuel cap/evaporative emission control system visual inspections in the decentralized facilities, all as a part of the BIM, and 3) the excess carbon monoxide emission reductions that have been achieved through vehicle fleet turnover since 1996. This Table demonstrated that the gains in emission reductions far outweigh the losses due to the test frequency modification. Thus, the State has demonstrated emission equivalency, and should be allowed to modify its BIM test frequency to biennial during the transitional period between the existing BIM program and full implementation of the EIM program.

TABLE XIII: Summary of Emission Equivalency Demonstration

	VOC (gpm)	CO (gpm)
Loss due to Modification	0.026	0.365
Gain due to Fuel Cap Inspections[†]	0.033	N/A
Excess due to 1996 through 1998 vehicle fleet turnover	N/A	0.743
Excess Benefits	0.007	0.377

[†] This is a combination of the gain in emission reductions due to both centralized fuel cap pressure tests/fuel cap visual inspections and decentralized visual inspections.

calculated running loss) is 40F or less, or input
daily minimum is 25F or less; no evaporative emission
factors (hot soak, diurnal, running loss, or resting
loss) will be calculated.

0Emission factors are as of Jan. 1st of the indicated calendar year.

0User supplied veh registration distributions.

0Cal. Year: 1998 I/M Program: Yes Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 16.2 / 20.0 / 16.2 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.623	0.183	0.081		0.034	0.001	0.001	0.069	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.64	2.10	3.16	2.42	3.33	0.62	0.97	2.21	2.25	1.944
Exhaust HC:	1.60	2.06	3.11	2.38	3.09	0.62	0.97	2.21	2.25	1.904
Evaporat HC:	0.01	0.00	0.01	0.01	0.01				0.00	0.006
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.034
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	21.01	24.98	33.93	27.72	40.05	1.48	1.77	11.25	23.05	22.718
Exhaust NOX:	1.58	1.81	2.59	2.05	5.14	1.36	1.67	10.46	0.98	2.436

-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp

-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp

-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp

-M 83 Comment:
+ One or more evaporative temperatures (input daily
maximum, input ambient, calculated hot soak, and/or
calculated running loss) is 40F or less, or input
daily minimum is 25F or less; no evaporative emission
factors (hot soak, diurnal, running loss, or resting
loss) will be calculated.

0Emission factors are as of Jan. 1st of the indicated calendar year.

0User supplied veh registration distributions.

0Cal. Year: 1999 I/M Program: Yes Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 16.2 / 20.0 / 16.2 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.620	0.185	0.081		0.034	0.001	0.001	0.071	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.61	2.03	3.08	2.35	3.14	0.57	0.89	2.19	2.24	1.900
Exhaust HC:	1.57	1.99	3.04	2.31	2.90	0.57	0.89	2.19	2.24	1.860
Evaporat HC:	0.01	0.00	0.01	0.00	0.01				0.00	0.005
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.034
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	20.75	24.75	34.08	27.60	35.85	1.42	1.69	11.16	23.05	22.382
Exhaust NOX:	1.53	1.75	2.59	2.01	4.96	1.27	1.56	9.81	0.98	2.355

```
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M 83 Comment:
+              One or more evaporative temperatures (input daily
              maximum, input ambient, calculated hot soak, and/or
              calculated running loss) is 40F or less, or input
              daily minimum is 25F or less; no evaporative emission
              factors (hot soak, diurnal, running loss, or resting
              loss) will be calculated.
0Emission factors are as of Jan. 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 2000        I/M Program: Yes       Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
                Anti-tam. Program: Yes     Operating Mode: 16.2 / 20.0 / 16.2   Altitude:  500. Ft.
                 Reformulated Gas: Yes          ASTM Class: C
```

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.617	0.187	0.082		0.034	0.001	0.001	0.072	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.58	1.97	3.01	2.29	2.99	0.54	0.83	2.17	2.24	1.862
Exhaust HC:	1.55	1.94	2.97	2.25	2.76	0.54	0.83	2.17	2.24	1.823
Evaporat HC:	0.01	0.00	0.00	0.00	0.00				0.00	0.005
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.034
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	20.54	24.60	34.17	27.52	32.51	1.38	1.63	11.09	23.05	22.111
Exhaust NOX:	1.48	1.71	2.56	1.97	4.81	1.19	1.46	9.19	0.98	2.279

```
1MOBILE5.0 Run - New Jersey Centralized Current Program - Biennial
 MOB5a_H I/M Program Options (Nov-95)

0
-M 49 Warning:
+               1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+              0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+              0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+              0.999     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+              0.998     MYR sum not = 1. (will normalize)
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M 83 Comment:
```

+ One or more evaporative temperatures (input daily maximum, input ambient, calculated hot soak, and/or calculated running loss) is 40F or less, or input daily minimum is 25F or less; no evaporative emission factors (hot soak, diurnal, running loss, or resting loss) will be calculated.

0I/M program selected:

0 Start year (January 1):	1974
Pre-1981 MYR stringency rate:	20%
First model year covered:	1968
Last model year covered:	2020
Waiver rate (pre-1981):	0.%
Waiver rate (1981 and newer):	0.%
Compliance Rate:	96.%
Inspection type:	Test Only
Inspection frequency	Biennial
Vehicle types covered:	LDGV - Yes
	LDGT1 - Yes
	LDGT2 - Yes
	HDGV - Yes
1981 & later MYR test type:	Idle

Cutpoints, HC: 220.000 CO: 1.200 NOx: 999.000

0Functional Check Program Description:

0Check	Start (Jan1)	Model Yrs Covered	Vehicle Classes Covered LDGV	LDGT1	LDGT2	HDGV	Inspection Type	Freq	Comp Rate
ATP	1985	1975-2020	Yes	Yes	Yes	No	Test Only	Biennial	96.0%

0Air pump system disablements: No Catalyst removals: Yes
Fuel inlet restrictor disablements: Yes Tailpipe lead deposit test: No
EGR disablement: No Evaporative system disablements: No
PCV system disablements: No Missing gas caps: No

0Stage II program selected:

0 Start year (January 1):	1989
Phase-in period (yrs.):	1
Percent Efficiency for LDGV & LDGT:	85.%
Percent Efficiency for HDGV:	0.%

0..... Minimum Temp: 38. (F) Maximum Temp: 38. (F)
Period 1 RVP: 9.0 Period 2 RVP: 9.0 Period 2 Start Yr: 1989

0VOC HC emission factors include evaporative HC emission factors.

0_____

0Emission factors are as of Jan. 1st of the indicated calendar year.

0User supplied veh registration distributions.

0Cal. Year: 1998 I/M Program: Yes Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 16.2 / 20.0 / 16.2 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.623	0.183	0.081		0.034	0.001	0.001	0.069	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.54	1.98	2.98	2.29	3.33	0.62	0.97	2.21	2.25	1.847
Exhaust HC:	1.51	1.94	2.94	2.24	3.09	0.62	0.97	2.21	2.25	1.807

Evaporat HC:	0.01	0.00	0.01	0.01	0.01				0.00	0.006
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.034
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	19.90	23.53	31.27	25.91	39.03	1.48	1.77	11.25	23.05	21.513
Exhaust NOX:	1.58	1.81	2.60	2.05	5.14	1.36	1.67	10.46	0.98	2.438

-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M 83 Comment:
+ One or more evaporative temperatures (input daily maximum, input ambient, calculated hot soak, and/or calculated running loss) is 40F or less, or input daily minimum is 25F or less; no evaporative emission factors (hot soak, diurnal, running loss, or resting loss) will be calculated.

0Emission factors are as of Jan. 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 1999 I/M Program: Yes Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 16.2 / 20.0 / 16.2 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.620	0.185	0.081		0.034	0.001	0.001	0.071	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.51	1.91	2.89	2.21	3.14	0.57	0.89	2.19	2.24	1.801
Exhaust HC:	1.47	1.87	2.85	2.17	2.90	0.57	0.89	2.19	2.24	1.761
Evaporat HC:	0.01	0.00	0.01	0.00	0.01				0.00	0.005
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.034
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	19.65	23.32	31.43	25.80	34.94	1.42	1.69	11.16	23.05	21.186
Exhaust NOX:	1.53	1.76	2.59	2.01	4.96	1.27	1.56	9.81	0.98	2.357

-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M 83 Comment:
+ One or more evaporative temperatures (input daily maximum, input ambient, calculated hot soak, and/or calculated running loss) is 40F or less, or input daily minimum is 25F or less; no evaporative emission factors (hot soak, diurnal, running loss, or resting loss) will be calculated.

0Emission factors are as of Jan. 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 2000 I/M Program: Yes Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low

calculated running loss) is 40F or less, or input
daily minimum is 25F or less; no evaporative emission
factors (hot soak, diurnal, running loss, or resting
loss) will be calculated.

0Emission factors are as of Jan. 1st of the indicated calendar year.

0User supplied veh registration distributions.

0Cal. Year: 1999 I/M Program: Yes Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 16.2 / 20.0 / 16.2 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.620	0.185	0.081		0.034	0.001	0.001	0.071	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.62	2.07	3.14	2.40	3.22	0.57	0.89	2.19	2.24	1.925
Exhaust HC:	1.59	2.03	3.10	2.36	2.99	0.57	0.89	2.19	2.24	1.885
Evaporat HC:	0.01	0.00	0.01	0.00	0.01				0.00	0.005
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.034
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	20.92	25.07	34.61	27.98	36.75	1.42	1.69	11.16	23.05	22.617
Exhaust NOX:	1.53	1.75	2.59	2.01	4.96	1.27	1.56	9.81	0.98	2.354

-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp

-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp

-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp

-M 83 Comment:
+ One or more evaporative temperatures (input daily
maximum, input ambient, calculated hot soak, and/or
calculated running loss) is 40F or less, or input
daily minimum is 25F or less; no evaporative emission
factors (hot soak, diurnal, running loss, or resting
loss) will be calculated.

0Emission factors are as of Jan. 1st of the indicated calendar year.

0User supplied veh registration distributions.

0Cal. Year: 2000 I/M Program: Yes Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 16.2 / 20.0 / 16.2 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.617	0.187	0.082		0.034	0.001	0.001	0.072	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.59	2.01	3.06	2.33	3.07	0.54	0.83	2.17	2.24	1.885
Exhaust HC:	1.56	1.97	3.02	2.29	2.84	0.54	0.83	2.17	2.24	1.846
Evaporat HC:	0.01	0.00	0.00	0.00	0.00				0.00	0.005
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.034
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	20.70	24.89	34.63	27.85	33.33	1.38	1.63	11.09	23.05	22.328
Exhaust NOX:	1.48	1.71	2.56	1.97	4.81	1.19	1.46	9.19	0.98	2.278

The State of New Jersey
Department of Environmental Protection

Revision to the
State Implementation Plan (SIP)
for the Enhanced Inspection and Maintenance (I/M)
Program for the State of New Jersey

Appendix II: MOBILE Input and Output Files and Calculation Spreadsheets

February 25, 1998

VOC Calculations

Basic Annual

	Test-Only	Test-and-Repair	Composite
Jul-99	1.984	2.080	
Jul-00	1.696	1.780	
Jan-00	1.840	1.930	1.869

Basic Biennial

	Test-Only	Test-and-Repair	Composite
Jul-99	2.017	2.097	
Jul-00	1.724	1.794	
Jan-00	1.871	1.946	1.895

VOC Loss (gpm) 0.026

Basic Biennial incl. Centralized Evap. Benefits

	Test-Only	Test-and-Repair	Composite	Adjusted for fuel cap only
Jul-99	1.883	2.097		
Jul-00	1.619	1.794		
Jan-00	1.751	1.946	1.813	1.862

VOC Gain (gpm) 0.033

Basic Biennial incl. Decentralized Visual Benefits

	Test-Only	Test-and-Repair	Composite
Jul-99	2.017	2.097	
Jul-00	1.724	1.794	
Jan-00	1.871	1.946	1.895

VOC Gain (gpm) 0.000

Excess VOC benefits (gpm) 0.007

CO Calculations

		Basic Annual	
	Test-Only	Test-and-Repair	Composite
Jan-00	20.487	22.111	21.007

		Basic Biennial	
	Test-Only	Test-and-Repair	Composite
Jan-00	20.922	22.328	21.372

CO Loss (gpm) 0.365

		Basic Annual	
	Test-Only	Test-and-Repair	Composite
Jan-96	21.701	23.566	22.298
Jan-98	21.008	22.718	21.555

CO gain (gpm) 0.743

Excess CO benefit (gpm) 0.377

```
1           PROMPT -
MOBILE5.0 Run - New Jersey Centralized Current Program - Annual
1           TAMFLG -
1           SPDFLG -
1           VMFLAG -
3           MYMRFG -
1           NEWFLG -
2           IMFLAG -
1           ALHFLG -
2           ATPFLG -
2           RLFLAG -
2           LOCFLG -
1           TEMFLG -
3           OUTFMT -
4           PRTFLG -
2           IDLFLG -
3           NMHFLG -
2           HCFLAG -
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
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0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
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0.0100.0090.0080.0060.018
0.0570.1070.1030.0750.0800.0970.0890.0520.0460.035
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0.0000.0000.0000.0000.000
74 20 68 20 00 00 096 1 1 2222 1111 220. 1.20 999. Basic I/M
85 75 20 2221 11 096. 12211111                      ATP
89 1 85 70
..............  C  71.  95.  9.0  9.0 89 1 1 2    LAP record
1 98 19.6 75.0 20.6 27.3 20.6 7
1 99 19.6 75.0 20.6 27.3 20.6 7
1 00 19.6 75.0 20.6 27.3 20.6 7
000000000000000000000000000000000000000000000000000000
1           PROMPT -
MOBILE5.0 Run - New Jersey Decentralized Current Program - Annual
1           TAMFLG -
1           SPDFLG -
1           VMFLAG -
```

```
3           MYMRFG -
1           NEWFLG -
2           IMFLAG -
1           ALHFLG -
2           ATPFLG -
2           RLFLAG -
2           LOCFLG -
1           TEMFLG -
3           OUTFMT -
4           PRTFLG -
2           IDLFLG -
3           NMHFLG -
2           HCFLAG -
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
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0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0380.0720.0710.0590.0640.0700.0670.0560.0460.039
0.0290.0690.0600.0510.0390.0250.0230.0250.0180.014
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0.0360.0620.0630.0560.0580.0630.0620.0490.0420.035
0.0310.0650.0560.0500.0390.0320.0290.0330.0240.018
0.0160.0160.0110.0110.042
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0570.1070.1030.0750.0800.0970.0890.0520.0460.035
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0.0000.0000.0000.0000.000
74 20 68 20 00 00 096 2 1 2222 1111 220. 1.20 999. Basic I/M
85 75 20 2221 21 096. 12211111                     ATP
89 1 85 70
..............  C  71.  95.  9.0  9.0 89 1 1 2    LAP record
1 98 19.6 75.0 20.6 27.3 20.6 7
1 99 19.6 75.0 20.6 27.3 20.6 7
1 00 19.6 75.0 20.6 27.3 20.6 7
000000000000000000000000000000000000000000000000000
1           PROMPT -
MOBILE5.0 Run - New Jersey Centralized Current Program - Biennial
1           TAMFLG -
1           SPDFLG -
1           VMFLAG -
3           MYMRFG -
1           NEWFLG -
2           IMFLAG -
1           ALHFLG -
2           ATPFLG -
```

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2           RLFLAG -
2           LOCFLG -
1           TEMFLG -
3           OUTFMT -
4           PRTFLG -
2           IDLFLG -
3           NMHFLG -
2           HCFLAG -
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
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0.0360.0620.0630.0560.0580.0630.0620.0490.0420.035
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0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
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0.0420.0470.0340.0280.0120.0140.0170.0190.0120.009
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0.0000.0000.0000.0000.000
74 20 68 20 00 00 096 1 2 2222 1111 220. 1.20 999. Basic I/M
85 75 20 2221 12 096. 12211111                      ATP
89 1 85 70
.............. C  71.  95.  9.0  9.0 89 1 1 2    LAP record
1 98 19.6 75.0 20.6 27.3 20.6 7
1 99 19.6 75.0 20.6 27.3 20.6 7
1 00 19.6 75.0 20.6 27.3 20.6 7
00000000000000000000000000000000000000000000000000000000
1           PROMPT -
MOBILE5.0 Run - New Jersey Decentralized Current Program - Biennial
1           TAMFLG -
1           SPDFLG -
1           VMFLAG -
3           MYMRFG -
1           NEWFLG -
2           IMFLAG -
1           ALHFLG -
2           ATPFLG -
2           RLFLAG -
2           LOCFLG -
1           TEMFLG -
3           OUTFMT -
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2           IDLFLG -
3           NMHFLG -
2           HCFLAG -
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0.0310.0650.0560.0500.0390.0320.0290.0330.0240.018
0.0160.0160.0110.0110.042
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
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0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
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0.0000.0000.0000.0000.000
74 20 68 20 00 00 096 2 2 2222 1111 220. 1.20 999. Basic I/M
85 75 20 2221 22 096. 12211111                     ATP
89 1 85 70
.............. C  71.  95.  9.0  9.0 89 1 1 2    LAP record
1 98 19.6 75.0 20.6 27.3 20.6 7
1 99 19.6 75.0 20.6 27.3 20.6 7
1 00 19.6 75.0 20.6 27.3 20.6 7
00000000000000000000000000000000000000000000000000000000000000000000000000
1           PROMPT -
MOBILE5.0 Run - New Jersey Centralized Current Program - Biennial - Gas Cap
1           TAMFLG -
1           SPDFLG -
1           VMFLAG -
3           MYMRFG -
1           NEWFLG -
2           IMFLAG -
1           ALHFLG -
5           ATPFLG -
2           RLFLAG -
2           LOCFLG -
1           TEMFLG -
3           OUTFMT -
4           PRTFLG -
2           IDLFLG -
3           NMHFLG -
2           HCFLAG -
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
```

```
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0380.0720.0710.0590.0640.0700.0670.0560.0460.039
0.0290.0690.0600.0510.0390.0250.0230.0250.0180.014
0.0100.0110.0100.0070.025
0.0360.0620.0630.0560.0580.0630.0620.0490.0420.035
0.0310.0650.0560.0500.0390.0320.0290.0330.0240.018
0.0160.0160.0110.0110.042
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0570.1070.1030.0750.0800.0970.0890.0520.0460.035
0.0420.0470.0340.0280.0120.0140.0170.0190.0120.009
0.0060.0050.0050.0020.007
0.1440.1680.1350.1090.0880.0700.0560.0450.0360.029
0.0230.0970.0000.0000.0000.0000.0000.0000.0000.000
0.0000.0000.0000.0000.000
74 20 68 20 00 00 096 1 2 2222 1111 220. 1.20 999. Basic I/M
85 75 20 2221 12 096. 12211112                      ATP
98 70 20 2221 12 096.                               Pressure Check
89 1 85 70
.............. C  71.  95.  9.0  9.0 89 1 1 2     LAP record
1 98 19.6 75.0 20.6 27.3 20.6 7
1 99 19.6 75.0 20.6 27.3 20.6 7
1 00 19.6 75.0 20.6 27.3 20.6 7
0000000000000000000000000000000000000000000000000000000000
1          PROMPT -
MOBILE5.0 Run - New Jersey Decentralized Current Program - Biennial - Gas Cap
1          TAMFLG -
1          SPDFLG -
1          VMFLAG -
3          MYMRFG -
1          NEWFLG -
2          IMFLAG -
1          ALHFLG -
2          ATPFLG -
2          RLFLAG -
2          LOCFLG -
1          TEMFLG -
3          OUTFMT -
4          PRTFLG -
2          IDLFLG -
3          NMHFLG -
2          HCFLAG -
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
```

```
0.0380.0720.0710.0590.0640.0700.0670.0560.0460.039
0.0290.0690.0600.0510.0390.0250.0230.0250.0180.014
0.0100.0110.0100.0070.025
0.0360.0620.0630.0560.0580.0630.0620.0490.0420.035
0.0310.0650.0560.0500.0390.0320.0290.0330.0240.018
0.0160.0160.0110.0110.042
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0570.1070.1030.0750.0800.0970.0890.0520.0460.035
0.0420.0470.0340.0280.0120.0140.0170.0190.0120.009
0.0060.0050.0050.0020.007
0.1440.1680.1350.1090.0880.0700.0560.0450.0360.029
0.0230.0970.0000.0000.0000.0000.0000.0000.0000.000
0.0000.0000.0000.0000.000
74 20 68 20 00 00 096 2 2 2222 1111 220. 1.20 999. Basic I/M
85 75 20 2221 22 096. 12211112                      ATP
89 1 85 70
.............. C  71.  95.  9.0  9.0 89 1 1 2    LAP record
1 98 19.6 75.0 20.6 27.3 20.6 7
1 99 19.6 75.0 20.6 27.3 20.6 7
1 00 19.6 75.0 20.6 27.3 20.6 7
```

```
1MOBILE5.0 Run - New Jersey Centralized Current Program - Annual
 MOB5a_H I/M Program Options (Nov-95)

0
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.999     MYR sum not = 1. (will normalize)
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
0I/M program selected:

0    Start year (January 1):              1974
     Pre-1981 MYR stringency rate:         20%
     First model year covered:            1968
     Last model year covered:             2020
     Waiver rate (pre-1981):               0.%
     Waiver rate (1981 and newer):         0.%
     Compliance Rate:                     96.%
     Inspection type:                     Test Only
     Inspection frequency                 Annual
     Vehicle types covered:               LDGV - Yes
                                         LDGT1 - Yes
                                         LDGT2 - Yes
                                          HDGV - Yes
     1981 & later MYR test type:          Idle
     Cutpoints, HC:  220.000   CO:    1.200   NOx:  999.000
0Functional Check Program Description:
0Check Start   Model Yrs  Vehicle Classes Covered        Inspection        Comp
       (Jan1)  Covered    LDGV   LDGT1  LDGT2  HDGV    Type      Freq      Rate

 ATP   1985    1975-2020  Yes    Yes    Yes    No  Test Only     Annual    96.0%
0Air pump system disablements:       No   Catalyst removals:                  Yes
 Fuel inlet restrictor disablements: Yes  Tailpipe lead deposit test:         No
 EGR disablement:                    No   Evaporative system disablements:    No
 PCV system disablements:            No   Missing gas caps:                   No
0Stage II program selected:

0    Start year (January 1):              1989
     Phase-in period (yrs.):                 1
     Percent Efficiency for LDGV & LDGT: 85.%
     Percent Efficiency for HDGV:          0.%

0.............                              Minimum Temp:  71. (F)         Maximum Temp:  95. (F)
                       Period 1 RVP:  9.0      Period 2 RVP:  9.0        Period 2 Start Yr: 1989
0VOC HC emission factors include evaporative HC emission factors.
0_____________________________________________________________________________________________
0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.
```

0Cal. Year: 1998 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.622	0.184	0.081		0.034	0.001	0.001	0.070	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.74	2.00	2.92	2.29	5.09	0.61	0.96	2.20	5.59	2.055
Exhaust HC:	0.92	1.15	1.79	1.35	2.27	0.61	0.96	2.20	1.85	1.177
Evaporat HC:	0.23	0.31	0.41	0.34	1.57				3.30	0.308
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.48	0.42	0.60	0.47	0.79					0.453
Rsting L HC:	0.07	0.07	0.07	0.07	0.09				0.45	0.067
Exhaust CO:	11.73	14.21	19.90	15.95	37.06	1.55	1.86	11.20	21.88	13.712
Exhaust NOX:	1.30	1.48	2.14	1.68	4.68	1.31	1.65	10.13	0.76	2.132

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.

0Cal. Year: 1999 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.618	0.186	0.082		0.034	0.001	0.001	0.071	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.69	1.92	2.82	2.19	4.75	0.57	0.89	2.18	5.59	1.984
Exhaust HC:	0.91	1.11	1.74	1.30	2.10	0.57	0.89	2.18	1.84	1.152
Evaporat HC:	0.22	0.29	0.38	0.32	1.45				3.30	0.290
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.46	0.40	0.58	0.46	0.74					0.430
Rsting L HC:	0.06	0.06	0.07	0.07	0.08				0.45	0.061
Exhaust CO:	11.71	13.91	19.66	15.67	32.68	1.50	1.79	11.12	21.88	13.475
Exhaust NOX:	1.27	1.44	2.13	1.65	4.56	1.23	1.54	9.50	0.76	2.066

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.

0Cal. Year: 2000 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.615	0.187	0.082		0.034	0.001	0.001	0.073	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.41	1.63	2.41	1.87	4.01	0.54	0.82	2.16	5.21	1.696
Exhaust HC:	0.81	0.99	1.56	1.16	1.87	0.54	0.82	2.16	1.80	1.046
Evaporat HC:	0.18	0.24	0.31	0.26	1.18				2.96	0.237
Refuel L HC:	0.04	0.05	0.05	0.05	0.35					0.047
Runing L HC:	0.33	0.30	0.44	0.34	0.52					0.311
Rsting L HC:	0.06	0.06	0.06	0.06	0.08				0.45	0.056
Exhaust CO:	11.70	13.75	19.53	15.51	28.85	1.46	1.72	11.07	21.88	13.297
Exhaust NOX:	1.24	1.41	2.11	1.62	4.44	1.17	1.44	8.93	0.76	2.007

```
1MOBILE5.0 Run - New Jersey Decentralized Current Program - Annual
 MOB5a_H I/M Program Options (Nov-95)

0
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.999     MYR sum not = 1. (will normalize)
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
0I/M program selected:

0    Start year (January 1):              1974
     Pre-1981 MYR stringency rate:         20%
     First model year covered:            1968
     Last model year covered:             2020
     Waiver rate (pre-1981):               0.%
     Waiver rate (1981 and newer):         0.%
     Compliance Rate:                     96.%
     Inspection type:                     Computerized Test and Repair
     Inspection frequency                 Annual
     Vehicle types covered:               LDGV - Yes
                                         LDGT1 - Yes
                                         LDGT2 - Yes
                                          HDGV - Yes
     1981 & later MYR test type:          Idle
     Cutpoints, HC:  220.000   CO:    1.200   NOx:  999.000
0Functional Check Program Description:
0Check Start   Model Yrs  Vehicle Classes Covered        Inspection        Comp
       (Jan1)  Covered    LDGV   LDGT1  LDGT2  HDGV    Type      Freq      Rate

 ATP   1985    1975-2020  Yes    Yes    Yes    No  Test & Repair Annual    96.0%
0Air pump system disablements:       No   Catalyst removals:                  Yes
 Fuel inlet restrictor disablements: Yes  Tailpipe lead deposit test:         No
 EGR disablement:                    No   Evaporative system disablements:    No
 PCV system disablements:            No   Missing gas caps:                   No
0Stage II program selected:

0    Start year (January 1):              1989
     Phase-in period (yrs.):                 1
     Percent Efficiency for LDGV & LDGT: 85.%
     Percent Efficiency for HDGV:          0.%

0.............                              Minimum Temp:  71. (F)         Maximum Temp:  95. (F)
                       Period 1 RVP:  9.0      Period 2 RVP:  9.0        Period 2 Start Yr: 1989
0VOC HC emission factors include evaporative HC emission factors.
0_____________________________________________________________________________________________
0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.
```

0Cal. Year: 1998 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.622	0.184	0.081		0.034	0.001	0.001	0.070	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.83	2.14	3.13	2.45	5.24	0.61	0.96	2.20	5.59	2.154
Exhaust HC:	1.01	1.29	2.00	1.51	2.41	0.61	0.96	2.20	1.85	1.277
Evaporat HC:	0.23	0.31	0.41	0.34	1.57				3.30	0.308
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.48	0.42	0.60	0.47	0.79					0.453
Rsting L HC:	0.07	0.07	0.07	0.07	0.09				0.45	0.067
Exhaust CO:	12.78	15.96	23.02	18.12	40.13	1.55	1.86	11.20	21.88	15.045
Exhaust NOX:	1.30	1.48	2.13	1.68	4.68	1.31	1.65	10.13	0.76	2.130

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.

0Cal. Year: 1999 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.618	0.186	0.082		0.034	0.001	0.001	0.071	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.77	2.05	3.02	2.35	4.88	0.57	0.89	2.18	5.59	2.080
Exhaust HC:	0.99	1.24	1.94	1.46	2.23	0.57	0.89	2.18	1.84	1.249
Evaporat HC:	0.22	0.29	0.38	0.32	1.45				3.30	0.290
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.46	0.40	0.58	0.46	0.74					0.430
Rsting L HC:	0.06	0.06	0.07	0.07	0.08				0.45	0.061
Exhaust CO:	12.73	15.53	22.57	17.68	35.37	1.50	1.79	11.12	21.88	14.741
Exhaust NOX:	1.26	1.44	2.12	1.65	4.56	1.23	1.54	9.50	0.76	2.063

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.

0Cal. Year: 2000 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.615	0.187	0.082		0.034	0.001	0.001	0.073	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.48	1.74	2.59	2.00	4.12	0.54	0.82	2.16	5.21	1.780
Exhaust HC:	0.88	1.10	1.73	1.29	1.99	0.54	0.82	2.16	1.80	1.129
Evaporat HC:	0.18	0.24	0.31	0.26	1.18				2.96	0.237
Refuel L HC:	0.04	0.05	0.05	0.05	0.35					0.047
Runing L HC:	0.33	0.30	0.44	0.34	0.52					0.311
Rsting L HC:	0.06	0.06	0.06	0.06	0.08				0.45	0.056
Exhaust CO:	12.70	15.25	22.25	17.38	31.21	1.46	1.72	11.07	21.88	14.502
Exhaust NOX:	1.23	1.41	2.10	1.62	4.44	1.17	1.44	8.93	0.76	2.004

1MOBILE5.0 Run - New Jersey Centralized Current Program - Biennial
 MOB5a_H I/M Program Options (Nov-95)

0
-M 49 Warning:
+ 1.00 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.998 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.998 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.999 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 1.00 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.998 MYR sum not = 1. (will normalize)
0I/M program selected:

0 Start year (January 1): 1974
Pre-1981 MYR stringency rate: 20%
First model year covered: 1968
Last model year covered: 2020
Waiver rate (pre-1981): 0.%
Waiver rate (1981 and newer): 0.%
Compliance Rate: 96.%
Inspection type: Test Only
Inspection frequency Biennial
Vehicle types covered: LDGV - Yes
LDGT1 - Yes
LDGT2 - Yes
HDGV - Yes
1981 & later MYR test type: Idle
Cutpoints, HC: 220.000 CO: 1.200 NOx: 999.000
0Functional Check Program Description:

0Check Start (Jan1)	Model Yrs Covered	Vehicle Classes Covered LDGV	LDGT1	LDGT2	HDGV	Inspection Type	Freq	Comp Rate
ATP 1985	1975-2020	Yes	Yes	Yes	No	Test Only	Biennial	96.0%

0Air pump system disablements: No Catalyst removals: Yes
Fuel inlet restrictor disablements: Yes Tailpipe lead deposit test: No
EGR disablement: No Evaporative system disablements: No
PCV system disablements: No Missing gas caps: No
0Stage II program selected:

0 Start year (January 1): 1989
Phase-in period (yrs.): 1
Percent Efficiency for LDGV & LDGT: 85.%
Percent Efficiency for HDGV: 0.%

0..... Minimum Temp: 71. (F) Maximum Temp: 95. (F)
Period 1 RVP: 9.0 Period 2 RVP: 9.0 Period 2 Start Yr: 1989
0VOC HC emission factors include evaporative HC emission factors.
0
0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.

0Cal. Year: 1998 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.622	0.184	0.081		0.034	0.001	0.001	0.070	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.77	2.06	3.02	2.36	5.24	0.61	0.96	2.20	5.59	2.092
Exhaust HC:	0.95	1.21	1.89	1.42	2.41	0.61	0.96	2.20	1.85	1.214
Evaporat HC:	0.23	0.31	0.41	0.34	1.57				3.30	0.308
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.48	0.42	0.60	0.47	0.79					0.453
Rsting L HC:	0.07	0.07	0.07	0.07	0.09				0.45	0.067
Exhaust CO:	11.98	14.79	20.85	16.64	39.11	1.55	1.86	11.20	21.88	14.124
Exhaust NOX:	1.30	1.48	2.14	1.68	4.68	1.31	1.65	10.13	0.76	2.132

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 1999 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.618	0.186	0.082		0.034	0.001	0.001	0.071	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.71	1.97	2.90	2.25	4.88	0.57	0.89	2.18	5.59	2.017
Exhaust HC:	0.93	1.16	1.82	1.36	2.23	0.57	0.89	2.18	1.84	1.186
Evaporat HC:	0.22	0.29	0.38	0.32	1.45				3.30	0.290
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.46	0.40	0.58	0.46	0.74					0.430
Rsting L HC:	0.06	0.06	0.07	0.07	0.08				0.45	0.061
Exhaust CO:	11.95	14.42	20.49	16.27	34.47	1.50	1.79	11.12	21.88	13.849
Exhaust NOX:	1.27	1.44	2.13	1.65	4.56	1.23	1.54	9.50	0.76	2.065

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 2000 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.615	0.187	0.082		0.034	0.001	0.001	0.073	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.43	1.67	2.48	1.92	4.12	0.54	0.82	2.16	5.21	1.724
Exhaust HC:	0.83	1.03	1.62	1.21	1.99	0.54	0.82	2.16	1.80	1.074
Evaporat HC:	0.18	0.24	0.31	0.26	1.18				2.96	0.237
Refuel L HC:	0.04	0.05	0.05	0.05	0.35					0.047
Runing L HC:	0.33	0.30	0.44	0.34	0.52					0.311
Rsting L HC:	0.06	0.06	0.06	0.06	0.08				0.45	0.056
Exhaust CO:	11.93	14.18	20.25	16.03	30.43	1.46	1.72	11.07	21.88	13.634
Exhaust NOX:	1.23	1.41	2.11	1.62	4.44	1.17	1.44	8.93	0.76	2.007

```
1MOBILE5.0 Run - New Jersey Decentralized Current Program - Biennial
 MOB5a_H I/M Program Options (Nov-95)

0
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.999     MYR sum not = 1. (will normalize)
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
0I/M program selected:

0    Start year (January 1):              1974
     Pre-1981 MYR stringency rate:         20%
     First model year covered:            1968
     Last model year covered:             2020
     Waiver rate (pre-1981):               0.%
     Waiver rate (1981 and newer):         0.%
     Compliance Rate:                     96.%
     Inspection type:                     Computerized Test and Repair
     Inspection frequency                 Biennial
     Vehicle types covered:               LDGV - Yes
                                         LDGT1 - Yes
                                         LDGT2 - Yes
                                          HDGV - Yes
     1981 & later MYR test type:          Idle
     Cutpoints, HC:  220.000   CO:    1.200   NOx:  999.000
0Functional Check Program Description:
0Check Start   Model Yrs  Vehicle Classes Covered        Inspection        Comp
       (Jan1)  Covered    LDGV   LDGT1  LDGT2  HDGV    Type      Freq      Rate

 ATP   1985    1975-2020  Yes    Yes    Yes    No  Test & Repair Biennial  96.0%
0Air pump system disablements:       No   Catalyst removals:                  Yes
 Fuel inlet restrictor disablements: Yes  Tailpipe lead deposit test:         No
 EGR disablement:                    No   Evaporative system disablements:    No
 PCV system disablements:            No   Missing gas caps:                   No
0Stage II program selected:

0    Start year (January 1):              1989
     Phase-in period (yrs.):                 1
     Percent Efficiency for LDGV & LDGT: 85.%
     Percent Efficiency for HDGV:          0.%

0..............                              Minimum Temp:  71. (F)         Maximum Temp:  95. (F)
                       Period 1 RVP:  9.0      Period 2 RVP:  9.0        Period 2 Start Yr: 1989
0VOC HC emission factors include evaporative HC emission factors.
0_______________________________________________________________________________________________
0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.
```

0Cal. Year: 1998 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.622	0.184	0.081		0.034	0.001	0.001	0.070	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.84	2.17	3.18	2.48	5.31	0.61	0.96	2.20	5.59	2.173
Exhaust HC:	1.02	1.32	2.05	1.54	2.48	0.61	0.96	2.20	1.85	1.296
Evaporat HC:	0.23	0.31	0.41	0.34	1.57				3.30	0.308
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.48	0.42	0.60	0.47	0.79					0.453
Rsting L HC:	0.07	0.07	0.07	0.07	0.09				0.45	0.067
Exhaust CO:	12.91	16.25	23.49	18.46	41.16	1.55	1.86	11.20	21.88	15.251
Exhaust NOX:	1.30	1.48	2.13	1.68	4.68	1.31	1.65	10.13	0.76	2.130

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 1999 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.618	0.186	0.082		0.034	0.001	0.001	0.071	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.78	2.08	3.06	2.38	4.95	0.57	0.89	2.18	5.59	2.097
Exhaust HC:	1.01	1.27	1.98	1.49	2.30	0.57	0.89	2.18	1.84	1.266
Evaporat HC:	0.22	0.29	0.38	0.32	1.45				3.30	0.290
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.46	0.40	0.58	0.46	0.74					0.430
Rsting L HC:	0.06	0.06	0.07	0.07	0.08				0.45	0.061
Exhaust CO:	12.85	15.79	22.99	17.98	36.27	1.50	1.79	11.12	21.88	14.928
Exhaust NOX:	1.26	1.44	2.12	1.64	4.56	1.23	1.54	9.50	0.76	2.063

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 2000 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.615	0.187	0.082		0.034	0.001	0.001	0.073	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.49	1.76	2.62	2.03	4.18	0.54	0.82	2.16	5.21	1.794
Exhaust HC:	0.89	1.12	1.77	1.31	2.05	0.54	0.82	2.16	1.80	1.143
Evaporat HC:	0.18	0.24	0.31	0.26	1.18				2.96	0.237
Refuel L HC:	0.04	0.05	0.05	0.05	0.35					0.047
Runing L HC:	0.33	0.30	0.44	0.34	0.52					0.311
Rsting L HC:	0.06	0.06	0.06	0.06	0.08				0.45	0.056
Exhaust CO:	12.82	15.47	22.61	17.64	32.00	1.46	1.72	11.07	21.88	14.671
Exhaust NOX:	1.23	1.41	2.10	1.62	4.44	1.17	1.44	8.93	0.76	2.004

```
1MOBILE5.0 Run - New Jersey Centralized Current Program - Biennial - Gas Cap
 MOB5a_H I/M Program Options (Nov-95)

0
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.999     MYR sum not = 1. (will normalize)
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
0I/M program selected:

0    Start year (January 1):              1974
     Pre-1981 MYR stringency rate:         20%
     First model year covered:            1968
     Last model year covered:             2020
     Waiver rate (pre-1981):               0.%
     Waiver rate (1981 and newer):         0.%
     Compliance Rate:                     96.%
     Inspection type:                     Test Only
     Inspection frequency                 Biennial
     Vehicle types covered:               LDGV - Yes
                                         LDGT1 - Yes
                                         LDGT2 - Yes
                                          HDGV - Yes
     1981 & later MYR test type:          Idle
     Cutpoints, HC:  220.000   CO:    1.200   NOx:  999.000
0Functional Check Program Description:
0Check Start   Model Yrs  Vehicle Classes Covered        Inspection        Comp
       (Jan1)  Covered    LDGV   LDGT1  LDGT2  HDGV    Type      Freq      Rate

 Press 1998    1970-2020  Yes    Yes    Yes    No  Test Only     Biennial  96.0%
 ATP   1985    1975-2020  Yes    Yes    Yes    No  Test Only     Biennial  96.0%
0Air pump system disablements:       No   Catalyst removals:                  Yes
 Fuel inlet restrictor disablements: Yes  Tailpipe lead deposit test:         No
 EGR disablement:                    No   Evaporative system disablements:    No
 PCV system disablements:            No   Missing gas caps:                   Yes
0Stage II program selected:

0    Start year (January 1):              1989
     Phase-in period (yrs.):                 1
     Percent Efficiency for LDGV & LDGT: 85.%
     Percent Efficiency for HDGV:          0.%

0.............                                Minimum Temp:  71. (F)         Maximum Temp:  95. (F)
                       Period 1 RVP:  9.0      Period 2 RVP:  9.0        Period 2 Start Yr: 1989
0VOC HC emission factors include evaporative HC emission factors.
0_____________________________________________________________________________________________
0Emission factors are as of July 1st of the indicated calendar year.
```

0User supplied veh registration distributions.
0Cal. Year: 1998 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.622	0.184	0.081		0.034	0.001	0.001	0.070	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.63	1.89	2.80	2.17	5.24	0.61	0.96	2.20	5.59	1.957
Exhaust HC:	0.95	1.21	1.89	1.42	2.41	0.61	0.96	2.20	1.85	1.214
Evaporat HC:	0.18	0.25	0.35	0.28	1.57				3.30	0.262
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.39	0.31	0.45	0.35	0.79					0.363
Rsting L HC:	0.07	0.07	0.07	0.07	0.09				0.45	0.067
Exhaust CO:	11.98	14.79	20.85	16.64	39.11	1.55	1.86	11.20	21.88	14.124
Exhaust NOX:	1.30	1.48	2.14	1.68	4.68	1.31	1.65	10.13	0.76	2.132

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 1999 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.618	0.186	0.082		0.034	0.001	0.001	0.071	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.57	1.80	2.68	2.07	4.88	0.57	0.89	2.18	5.59	1.883
Exhaust HC:	0.93	1.16	1.82	1.36	2.23	0.57	0.89	2.18	1.84	1.186
Evaporat HC:	0.17	0.23	0.31	0.25	1.45				3.30	0.244
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.37	0.29	0.43	0.33	0.74					0.342
Rsting L HC:	0.06	0.06	0.07	0.07	0.08				0.45	0.061
Exhaust CO:	11.95	14.42	20.49	16.27	34.47	1.50	1.79	11.12	21.88	13.849
Exhaust NOX:	1.27	1.44	2.13	1.65	4.56	1.23	1.54	9.50	0.76	2.065

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 2000 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.615	0.187	0.082		0.034	0.001	0.001	0.073	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.32	1.54	2.30	1.77	4.12	0.54	0.82	2.16	5.21	1.619
Exhaust HC:	0.83	1.03	1.62	1.21	1.99	0.54	0.82	2.16	1.80	1.074
Evaporat HC:	0.14	0.18	0.25	0.20	1.18				2.96	0.195
Refuel L HC:	0.04	0.05	0.05	0.05	0.35					0.047
Runing L HC:	0.26	0.22	0.33	0.26	0.52					0.247
Rsting L HC:	0.06	0.06	0.06	0.06	0.08				0.45	0.056
Exhaust CO:	11.93	14.18	20.25	16.03	30.43	1.46	1.72	11.07	21.88	13.634
Exhaust NOX:	1.23	1.41	2.11	1.62	4.44	1.17	1.44	8.93	0.76	2.007

```
1MOBILE5.0 Run - New Jersey Decentralized Current Program - Biennial - Gas Cap
 MOB5a_H I/M Program Options (Nov-95)

0
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.999     MYR sum not = 1. (will normalize)
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
0I/M program selected:

0    Start year (January 1):              1974
     Pre-1981 MYR stringency rate:         20%
     First model year covered:            1968
     Last model year covered:             2020
     Waiver rate (pre-1981):               0.%
     Waiver rate (1981 and newer):         0.%
     Compliance Rate:                     96.%
     Inspection type:                     Computerized Test and Repair
     Inspection frequency                 Biennial
     Vehicle types covered:               LDGV - Yes
                                         LDGT1 - Yes
                                         LDGT2 - Yes
                                          HDGV - Yes
     1981 & later MYR test type:          Idle
     Cutpoints, HC:  220.000   CO:    1.200   NOx:  999.000
0Functional Check Program Description:
0Check Start   Model Yrs  Vehicle Classes Covered        Inspection        Comp
       (Jan1)  Covered    LDGV   LDGT1  LDGT2  HDGV    Type      Freq      Rate

 ATP   1985    1975-2020  Yes    Yes    Yes    No  Test & Repair Biennial  96.0%
0Air pump system disablements:       No   Catalyst removals:                   Yes
 Fuel inlet restrictor disablements: Yes  Tailpipe lead deposit test:          No
 EGR disablement:                    No   Evaporative system disablements:     No
 PCV system disablements:            No   Missing gas caps:                    Yes
0Stage II program selected:

0    Start year (January 1):              1989
     Phase-in period (yrs.):                 1
     Percent Efficiency for LDGV & LDGT: 85.%
     Percent Efficiency for HDGV:          0.%

0.............                                  Minimum Temp:  71. (F)         Maximum Temp:  95. (F)
                       Period 1 RVP:  9.0      Period 2 RVP:  9.0        Period 2 Start Yr: 1989
0VOC HC emission factors include evaporative HC emission factors.
0_____________________________________________________________________________________________________
0Emission factors are as of July 1st of the indicated calendar year.
```

0User supplied veh registration distributions.
0Cal. Year: 1998 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.622	0.184	0.081		0.034	0.001	0.001	0.070	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.84	2.17	3.18	2.48	5.31	0.61	0.96	2.20	5.59	2.173
Exhaust HC:	1.02	1.32	2.05	1.54	2.48	0.61	0.96	2.20	1.85	1.296
Evaporat HC:	0.23	0.31	0.41	0.34	1.57				3.30	0.308
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.48	0.42	0.60	0.47	0.79					0.453
Rsting L HC:	0.07	0.07	0.07	0.07	0.09				0.45	0.067
Exhaust CO:	12.91	16.25	23.49	18.46	41.16	1.55	1.86	11.20	21.88	15.251
Exhaust NOX:	1.30	1.48	2.13	1.68	4.68	1.31	1.65	10.13	0.76	2.130

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 1999 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.618	0.186	0.082		0.034	0.001	0.001	0.071	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.78	2.08	3.06	2.38	4.95	0.57	0.89	2.18	5.59	2.097
Exhaust HC:	1.01	1.27	1.98	1.49	2.30	0.57	0.89	2.18	1.84	1.266
Evaporat HC:	0.22	0.29	0.38	0.32	1.45				3.30	0.290
Refuel L HC:	0.04	0.05	0.05	0.05	0.38					0.050
Runing L HC:	0.46	0.40	0.58	0.46	0.74					0.430
Rsting L HC:	0.06	0.06	0.07	0.07	0.08				0.45	0.061
Exhaust CO:	12.85	15.79	22.99	17.98	36.27	1.50	1.79	11.12	21.88	14.928
Exhaust NOX:	1.26	1.44	2.12	1.64	4.56	1.23	1.54	9.50	0.76	2.063

0Emission factors are as of July 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 2000 I/M Program: Yes Ambient Temp: 89.5 / 89.5 / 89.5 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 20.6 / 27.3 / 20.6 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.615	0.187	0.082		0.034	0.001	0.001	0.073	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.49	1.76	2.62	2.03	4.18	0.54	0.82	2.16	5.21	1.794
Exhaust HC:	0.89	1.12	1.77	1.31	2.05	0.54	0.82	2.16	1.80	1.143
Evaporat HC:	0.18	0.24	0.31	0.26	1.18				2.96	0.237
Refuel L HC:	0.04	0.05	0.05	0.05	0.35					0.047
Runing L HC:	0.33	0.30	0.44	0.34	0.52					0.311
Rsting L HC:	0.06	0.06	0.06	0.06	0.08				0.45	0.056
Exhaust CO:	12.82	15.47	22.61	17.64	32.00	1.46	1.72	11.07	21.88	14.671
Exhaust NOX:	1.23	1.41	2.10	1.62	4.44	1.17	1.44	8.93	0.76	2.004

```
1           PROMPT -
MOBILE5.0 Run - New Jersey Centralized Current Program - Annual
1           TAMFLG -
1           SPDFLG -
1           VMFLAG -
3           MYMRFG -
1           NEWFLG -
2           IMFLAG -
1           ALHFLG -
2           ATPFLG -
2           RLFLAG -
2           LOCFLG -
1           TEMFLG -
3           OUTFMT -
4           PRTFLG -
2           IDLFLG -
3           NMHFLG -
2           HCFLAG -
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0380.0720.0710.0590.0640.0700.0670.0560.0460.039
0.0290.0690.0600.0510.0390.0250.0230.0250.0180.014
0.0100.0110.0100.0070.025
0.0360.0620.0630.0560.0580.0630.0620.0490.0420.035
0.0310.0650.0560.0500.0390.0320.0290.0330.0240.018
0.0160.0160.0110.0110.042
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0570.1070.1030.0750.0800.0970.0890.0520.0460.035
0.0420.0470.0340.0280.0120.0140.0170.0190.0120.009
0.0060.0050.0050.0020.007
0.1440.1680.1350.1090.0880.0700.0560.0450.0360.029
0.0230.0970.0000.0000.0000.0000.0000.0000.0000.000
0.0000.0000.0000.0000.000
74 20 68 20 00 00 096 1 1 2222 1111 220. 1.20 999. Basic I/M
85 75 20 2221 11 096. 12211111                      ATP
89 1 85 70
.............. C  38.  38.  9.0  9.0 89 1 1 2    LAP record
1 96 19.6 38.0 16.2 20.0 16.2 1
1 98 19.6 38.0 16.2 20.0 16.2 1
1 99 19.6 38.0 16.2 20.0 16.2 1
1 00 19.6 38.0 16.2 20.0 16.2 1
000000000000000000000000000000000000000000000000000000
1           PROMPT -
MOBILE5.0 Run - New Jersey Decentralized Current Program - Annual
1           TAMFLG -
1           SPDFLG -
```

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1           VMFLAG -
3           MYMRFG -
1           NEWFLG -
2           IMFLAG -
1           ALHFLG -
2           ATPFLG -
2           RLFLAG -
2           LOCFLG -
1           TEMFLG -
3           OUTFMT -
4           PRTFLG -
2           IDLFLG -
3           NMHFLG -
2           HCFLAG -
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0380.0720.0710.0590.0640.0700.0670.0560.0460.039
0.0290.0690.0600.0510.0390.0250.0230.0250.0180.014
0.0100.0110.0100.0070.025
0.0360.0620.0630.0560.0580.0630.0620.0490.0420.035
0.0310.0650.0560.0500.0390.0320.0290.0330.0240.018
0.0160.0160.0110.0110.042
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0570.1070.1030.0750.0800.0970.0890.0520.0460.035
0.0420.0470.0340.0280.0120.0140.0170.0190.0120.009
0.0060.0050.0050.0020.007
0.1440.1680.1350.1090.0880.0700.0560.0450.0360.029
0.0230.0970.0000.0000.0000.0000.0000.0000.0000.000
0.0000.0000.0000.0000.000
74 20 68 20 00 00 096 2 1 2222 1111 220. 1.20 999. Basic I/M
85 75 20 2221 21 096. 12211111                     ATP
89 1 85 70
.............. C  38.  38.  9.0  9.0 89 1 1 2    LAP record
1 96 19.6 38.0 16.2 20.0 16.2 1
1 98 19.6 38.0 16.2 20.0 16.2 1
1 99 19.6 38.0 16.2 20.0 16.2 1
1 00 19.6 38.0 16.2 20.0 16.2 1
00000000000000000000000000000000000000000000000000000000
1           PROMPT -
MOBILE5.0 Run - New Jersey Centralized Current Program - Biennial
1           TAMFLG -
1           SPDFLG -
1           VMFLAG -
3           MYMRFG -
1           NEWFLG -
2           IMFLAG -
```

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1           ALHFLG -
2           ATPFLG -
2           RLFLAG -
2           LOCFLG -
1           TEMFLG -
3           OUTFMT -
4           PRTFLG -
2           IDLFLG -
3           NMHFLG -
2           HCFLAG -
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0380.0720.0710.0590.0640.0700.0670.0560.0460.039
0.0290.0690.0600.0510.0390.0250.0230.0250.0180.014
0.0100.0110.0100.0070.025
0.0360.0620.0630.0560.0580.0630.0620.0490.0420.035
0.0310.0650.0560.0500.0390.0320.0290.0330.0240.018
0.0160.0160.0110.0110.042
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0570.1070.1030.0750.0800.0970.0890.0520.0460.035
0.0420.0470.0340.0280.0120.0140.0170.0190.0120.009
0.0060.0050.0050.0020.007
0.1440.1680.1350.1090.0880.0700.0560.0450.0360.029
0.0230.0970.0000.0000.0000.0000.0000.0000.0000.000
0.0000.0000.0000.0000.000
74 20 68 20 00 00 096 1 2 2222 1111 220. 1.20 999. Basic I/M
85 75 20 2221 12 096. 12211111                      ATP
89 1 85 70
.............. C  38.  38.  9.0  9.0 89 1 1 2    LAP record
1 98 19.6 38.0 16.2 20.0 16.2 1
1 99 19.6 38.0 16.2 20.0 16.2 1
1 00 19.6 38.0 16.2 20.0 16.2 1
000000000000000000000000000000000000000000000000000000
1           PROMPT -
MOBILE5.0 Run - New Jersey Decentralized Current Program - Biennial
1           TAMFLG -
1           SPDFLG -
1           VMFLAG -
3           MYMRFG -
1           NEWFLG -
2           IMFLAG -
1           ALHFLG -
2           ATPFLG -
2           RLFLAG -
2           LOCFLG -
1           TEMFLG -
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```
3           OUTFMT -
4           PRTFLG -
2           IDLFLG -
3           NMHFLG -
2           HCFLAG -
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0380.0720.0710.0590.0640.0700.0670.0560.0460.039
0.0290.0690.0600.0510.0390.0250.0230.0250.0180.014
0.0100.0110.0100.0070.025
0.0360.0620.0630.0560.0580.0630.0620.0490.0420.035
0.0310.0650.0560.0500.0390.0320.0290.0330.0240.018
0.0160.0160.0110.0110.042
0.0600.0980.0940.0910.0900.0830.0780.0740.0670.058
0.0490.0420.0330.0240.0180.0130.0080.0060.0040.003
0.0020.0020.0030.0010.003
0.0550.0990.0980.0920.0970.0730.0620.0330.0270.029
0.0310.0470.0440.0370.0280.0170.0230.0230.0190.013
0.0100.0090.0080.0060.018
0.0570.1070.1030.0750.0800.0970.0890.0520.0460.035
0.0420.0470.0340.0280.0120.0140.0170.0190.0120.009
0.0060.0050.0050.0020.007
0.1440.1680.1350.1090.0880.0700.0560.0450.0360.029
0.0230.0970.0000.0000.0000.0000.0000.0000.0000.000
0.0000.0000.0000.0000.000
74 20 68 20 00 00 096 2 2 2222 1111 220. 1.20 999. Basic I/M
85 75 20 2221 22 096. 12211111                      ATP
89 1 85 70
.............. C  38.  38.  9.0  9.0 89 1 1 2    LAP record
1 98 19.6 38.0 16.2 20.0 16.2 1
1 99 19.6 38.0 16.2 20.0 16.2 1
1 00 19.6 38.0 16.2 20.0 16.2 1
```

```
1MOBILE5.0 Run - New Jersey Centralized Current Program - Annual
 MOB5a_H I/M Program Options (Nov-95)

0
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.999     MYR sum not = 1. (will normalize)
-M 49 Warning:
+                1.00     MYR sum not = 1. (will normalize)
-M 49 Warning:
+               0.998     MYR sum not = 1. (will normalize)
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M 83 Comment:
+              One or more evaporative temperatures (input daily
               maximum, input ambient, calculated hot soak, and/or
               calculated running loss) is 40F or less, or input
              daily minimum is 25F or less; no evaporative emission
              factors (hot soak, diurnal, running loss, or resting
              loss) will be calculated.
0I/M program selected:

0     Start year (January 1):              1974
      Pre-1981 MYR stringency rate:         20%
      First model year covered:            1968
      Last model year covered:             2020
      Waiver rate (pre-1981):               0.%
      Waiver rate (1981 and newer):         0.%
      Compliance Rate:                     96.%
      Inspection type:                     Test Only
      Inspection frequency                 Annual
      Vehicle types covered:               LDGV - Yes
                                          LDGT1 - Yes
                                          LDGT2 - Yes
                                           HDGV - Yes
      1981 & later MYR test type:          Idle
      Cutpoints, HC:  220.000   CO:    1.200   NOx:  999.000
0Functional Check Program Description:
0Check Start   Model Yrs  Vehicle Classes Covered        Inspection        Comp
       (Jan1)  Covered    LDGV   LDGT1  LDGT2  HDGV    Type      Freq      Rate

 ATP   1985    1975-2020  Yes    Yes    Yes    No  Test Only     Annual    96.0%
CAir pump system disablements:       No   Catalyst removals:                  Yes
 Fuel inlet restrictor disablements: Yes  Tailpipe lead deposit test:         No
 EGR disablement:                    No   Evaporative system disablements:    No
 PCV system disablements:            No   Missing gas caps:                   No
```

0Stage II program selected:

0 Start year (January 1): 1989
Phase-in period (yrs.): 1
Percent Efficiency for LDGV & LDGT: 85.%
Percent Efficiency for HDGV: 0.%

0..... Minimum Temp: 38. (F) Maximum Temp: 38. (F)
Period 1 RVP: 9.0 Period 2 RVP: 9.0 Period 2 Start Yr: 1989
0VOC HC emission factors include evaporative HC emission factors.
0

0Emission factors are as of Jan. 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 1996 I/M Program: Yes Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 16.2 / 20.0 / 16.2 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.631	0.179	0.080		0.034	0.002	0.001	0.066	0.007	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.57	2.01	3.02	2.32	3.70	0.70	1.07	2.31	2.27	1.892
Exhaust HC:	1.54	1.97	2.97	2.28	3.46	0.70	1.07	2.31	2.27	1.850
Evaporat HC:	0.01	0.01	0.01	0.01	0.01				0.00	0.007
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.035
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	20.16	23.08	29.28	25.00	46.66	1.56	1.88	11.47	23.05	21.701
Exhaust NOX:	1.70	1.90	2.56	2.10	5.44	1.54	1.83	11.70	0.98	2.588

-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M 83 Comment:
+ One or more evaporative temperatures (input daily maximum, input ambient, calculated hot soak, and/or calculated running loss) is 40F or less, or input daily minimum is 25F or less; no evaporative emission factors (hot soak, diurnal, running loss, or resting loss) will be calculated.

0Emission factors are as of Jan. 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 1998 I/M Program: Yes Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 16.2 / 20.0 / 16.2 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.623	0.183	0.081		0.034	0.001	0.001	0.069	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.51	1.89	2.85	2.18	3.14	0.62	0.97	2.21	2.25	1.793
Exhaust HC:	1.47	1.85	2.80	2.14	2.91	0.62	0.97	2.21	2.25	1.753

Evaporat HC:	0.01	0.00	0.01	0.01	0.01				0.00	0.006
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.034
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	19.56	22.84	30.10	25.07	36.99	1.48	1.77	11.25	23.05	21.008
Exhaust NOX:	1.58	1.81	2.60	2.05	5.14	1.36	1.67	10.46	0.98	2.439

-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M 83 Comment:
+ One or more evaporative temperatures (input daily maximum, input ambient, calculated hot soak, and/or calculated running loss) is 40F or less, or input daily minimum is 25F or less; no evaporative emission factors (hot soak, diurnal, running loss, or resting loss) will be calculated.

0Emission factors are as of Jan. 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 1999 I/M Program: Yes Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
Anti-tam. Program: Yes Operating Mode: 16.2 / 20.0 / 16.2 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
+										
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.620	0.185	0.081		0.034	0.001	0.001	0.071	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.48	1.83	2.77	2.12	2.97	0.57	0.89	2.19	2.24	1.751
Exhaust HC:	1.44	1.79	2.73	2.08	2.73	0.57	0.89	2.19	2.24	1.711
Evaporat HC:	0.01	0.00	0.01	0.00	0.01				0.00	0.005
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.034
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	19.32	22.68	30.38	25.03	33.13	1.42	1.69	11.16	23.05	20.715
Exhaust NOX:	1.53	1.76	2.59	2.01	4.96	1.27	1.56	9.81	0.98	2.358

-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M 83 Comment:
+ One or more evaporative temperatures (input daily maximum, input ambient, calculated hot soak, and/or calculated running loss) is 40F or less, or input daily minimum is 25F or less; no evaporative emission factors (hot soak, diurnal, running loss, or resting loss) will be calculated.

0Emission factors are as of Jan. 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 2000 I/M Program: Yes Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low

Anti-tam. Program: Yes Operating Mode: 16.2 / 20.0 / 16.2 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.617	0.187	0.082		0.034	0.001	0.001	0.072	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.45	1.78	2.71	2.07	2.83	0.54	0.83	2.17	2.24	1.718
Exhaust HC:	1.42	1.74	2.67	2.03	2.60	0.54	0.83	2.17	2.24	1.679
Evaporat HC:	0.01	0.00	0.00	0.00	0.00				0.00	0.005
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.034
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	19.12	22.62	30.60	25.05	30.06	1.38	1.63	11.09	23.05	20.487
Exhaust NOX:	1.49	1.71	2.57	1.97	4.81	1.19	1.46	9.19	0.98	2.282

1MOBILE5.0 Run - New Jersey Decentralized Current Program - Annual
MOB5a_H I/M Program Options (Nov-95)

0
-M 49 Warning:
+ 1.00 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.998 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.998 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.999 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 1.00 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.998 MYR sum not = 1. (will normalize)
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M 83 Comment:
+ One or more evaporative temperatures (input daily maximum, input ambient, calculated hot soak, and/or calculated running loss) is 40F or less, or input daily minimum is 25F or less; no evaporative emission factors (hot soak, diurnal, running loss, or resting loss) will be calculated.
0I/M program selected:

0	Start year (January 1):	1974
	Pre-1981 MYR stringency rate:	20%
	First model year covered:	1968
	Last model year covered:	2020
	Waiver rate (pre-1981):	0.%
	Waiver rate (1981 and newer):	0.%
	Compliance Rate:	96.%
	Inspection type:	Computerized Test and Repair

```
     Inspection frequency                Annual
     Vehicle types covered:              LDGV - Yes
                                        LDGT1 - Yes
                                        LDGT2 - Yes
                                         HDGV - Yes
     1981 & later MYR test type:         Idle
     Cutpoints, HC:  220.000   CO:    1.200   NOx:  999.000
0Functional Check Program Description:
0Check Start   Model Yrs  Vehicle Classes Covered        Inspection        Comp
       (Jan1)  Covered    LDGV   LDGT1  LDGT2  HDGV    Type      Freq      Rate

 ATP   1985    1975-2020  Yes    Yes    Yes    No  Test & Repair Annual    96.0%
0Air pump system disablements:       No   Catalyst removals:                  Yes
 Fuel inlet restrictor disablements: Yes  Tailpipe lead deposit test:         No
 EGR disablement:                    No   Evaporative system disablements:    No
 PCV system disablements:            No   Missing gas caps:                   No
0Stage II program selected:

0    Start year (January 1):             1989
     Phase-in period (yrs.):                1
     Percent Efficiency for LDGV & LDGT: 85.%
     Percent Efficiency for HDGV:         0.%

0..............                              Minimum Temp:  38. (F)        Maximum Temp:  38. (F)
                      Period 1 RVP:  9.0      Period 2 RVP:  9.0        Period 2 Start Yr: 1989
0VOC HC emission factors include evaporative HC emission factors.
0_____________________________________________________________________________________________
0Emission factors are as of Jan. 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 1996        I/M Program: Yes       Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
                Anti-tam. Program: Yes     Operating Mode: 16.2 / 20.0 / 16.2   Altitude:  500. Ft.
                 Reformulated Gas: Yes         ASTM Class: C
```

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.631	0.179	0.080		0.034	0.002	0.001	0.066	0.007	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.71	2.24	3.36	2.59	3.92	0.70	1.07	2.31	2.27	2.055
Exhaust HC:	1.68	2.20	3.31	2.54	3.68	0.70	1.07	2.31	2.27	2.013
Evaporat HC:	0.01	0.01	0.01	0.01	0.01				0.00	0.007
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.035
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	21.65	25.53	33.71	28.06	50.56	1.56	1.88	11.47	23.05	23.566
Exhaust NOX:	1.70	1.90	2.56	2.10	5.44	1.54	1.83	11.70	0.98	2.586

```
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M 83 Comment:
+              One or more evaporative temperatures (input daily
              maximum, input ambient, calculated hot soak, and/or
```

Anti-tam. Program: Yes Operating Mode: 16.2 / 20.0 / 16.2 Altitude: 500. Ft.
Reformulated Gas: Yes ASTM Class: C

0 Veh. Type:	LDGV	LDGT1	LDGT2	LDGT	HDGV	LDDV	LDDT	HDDV	MC	All Veh
Veh. Speeds:	19.6	19.6	19.6		19.6	19.6	19.6	19.6	19.6	
VMT Mix:	0.617	0.187	0.082		0.034	0.001	0.001	0.072	0.006	
0Composite Emission Factors (Gm/Mile)										
VOC HC:	1.48	1.85	2.82	2.14	2.99	0.54	0.83	2.17	2.24	1.764
Exhaust HC:	1.45	1.81	2.78	2.11	2.76	0.54	0.83	2.17	2.24	1.724
Evaporat HC:	0.01	0.00	0.00	0.00	0.00				0.00	0.005
Refuel L HC:	0.03	0.04	0.04	0.04	0.23					0.034
Runing L HC:	0.00	0.00	0.00	0.00	0.00					0.000
Rsting L HC:	0.00	0.00	0.00	0.00	0.00				0.00	0.000
Exhaust CO:	19.44	23.18	31.53	25.72	31.70	1.38	1.63	11.09	23.05	20.922
Exhaust NOX:	1.49	1.71	2.57	1.97	4.81	1.19	1.46	9.19	0.98	2.281

1MOBILE5.0 Run - New Jersey Decentralized Current Program - Biennial
MOB5a_H I/M Program Options (Nov-95)

0
-M 49 Warning:
+ 1.00 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.998 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.998 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.999 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 1.00 MYR sum not = 1. (will normalize)
-M 49 Warning:
+ 0.998 MYR sum not = 1. (will normalize)
-M111 Error:
The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M111 Error:
+ The calculated exhaust temperature 39.4 is < daily min temp or > daily max temp
-M 83 Comment:
+ One or more evaporative temperatures (input daily maximum, input ambient, calculated hot soak, and/or calculated running loss) is 40F or less, or input daily minimum is 25F or less; no evaporative emission factors (hot soak, diurnal, running loss, or resting loss) will be calculated.
0I/M program selected:

0	Start year (January 1):	1974
	Pre-1981 MYR stringency rate:	20%
	First model year covered:	1968
	Last model year covered:	2020
	Waiver rate (pre-1981):	0.%
	Waiver rate (1981 and newer):	0.%
	Compliance Rate:	96.%
	Inspection type:	Computerized Test and Repair

```
     Inspection frequency                Biennial
     Vehicle types covered:               LDGV - Yes
                                         LDGT1 - Yes
                                         LDGT2 - Yes
                                          HDGV - Yes
     1981 & later MYR test type:         Idle
     Cutpoints, HC:  220.000   CO:    1.200   NOx:  999.000
0Functional Check Program Description:
0Check Start   Model Yrs  Vehicle Classes Covered        Inspection        Comp
       (Jan1)  Covered    LDGV   LDGT1  LDGT2  HDGV    Type      Freq      Rate

 ATP   1985    1975-2020  Yes    Yes    Yes    No  Test & Repair Biennial  96.0%
0Air pump system disablements:       No   Catalyst removals:                  Yes
 Fuel inlet restrictor disablements: Yes  Tailpipe lead deposit test:         No
 EGR disablement:                    No   Evaporative system disablements:    No
 PCV system disablements:            No   Missing gas caps:                   No
0Stage II program selected:

0    Start year (January 1):             1989
     Phase-in period (yrs.):                1
     Percent Efficiency for LDGV & LDGT: 85.%
     Percent Efficiency for HDGV:         0.%

0..............                          Minimum Temp:  38. (F)        Maximum Temp:  38. (F)
                      Period 1 RVP:  9.0      Period 2 RVP:  9.0       Period 2 Start Yr: 1989
0VOC HC emission factors include evaporative HC emission factors.
0_____________________________________________________________________________________________
0Emission factors are as of Jan. 1st of the indicated calendar year.
0User supplied veh registration distributions.
0Cal. Year: 1998        I/M Program: Yes       Ambient Temp: 39.4 / 39.4 / 39.4 (F) Region: Low
                Anti-tam. Program: Yes     Operating Mode: 16.2 / 20.0 / 16.2   Altitude:  500. Ft.
                 Reformulated Gas: Yes          ASTM Class: C
0  Veh. Type:      LDGV     LDGT1     LDGT2      LDGT      HDGV      LDDV      LDDT      HDDV      MC      All Veh
+                 ______   ______    ______     ______    ______    ______    ______    ______    ______   _______
 Veh. Speeds:     19.6      19.6      19.6                 19.6      19.6      19.6      19.6      19.6
     VMT Mix:      0.623     0.183     0.081               0.034     0.001     0.001     0.069     0.006
0Composite Emission Factors (Gm/Mile)
 VOC      HC:     1.65      2.14      3.22      2.47      3.42      0.62      0.97      2.21      2.25      1.971
 Exhaust  HC:     1.62      2.10      3.18      2.43      3.18      0.62      0.97      2.21      2.25      1.931
 Evaporat HC:     0.01      0.00      0.01      0.01      0.01                                    0.00      0.006
 Refuel L HC:     0.03      0.04      0.04      0.04      0.23                                              0.034
 Runing L HC:     0.00      0.00      0.00      0.00      0.00                                              0.000
 Rsting L HC:     0.00      0.00      0.00      0.00      0.00                                    0.00      0.000
 Exhaust  CO:    21.18     25.33     34.51     28.14     41.07      1.48      1.77     11.25     23.05     22.970
 Exhaust NOX:     1.58      1.80      2.59      2.05      5.14      1.36      1.67     10.46      0.98      2.435
_____________________________________________________________________________________________
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M111 Error:
+             The calculated exhaust      temperature  39.4 is < daily min temp or > daily max temp
-M111 Error:
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-M 83 Comment:
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              maximum, input ambient, calculated hot soak, and/or
```

The State of New Jersey
Department of Environmental Protection

Revision to the
State Implementation Plan (SIP)
for the Enhanced Inspection and Maintenance (I/M)
Program for the State of New Jersey

Appendix III: N.J.A.C. 13:20-43.7 - Test Frequency
(NJDMV enhanced I/M regulation)

February 25, 1998

NJ ADC 13:20-43.7
N.J.A.C. 13:20-43.7
N.J. Admin. Code tit. 13, § 20-43.7

NEW JERSEY ADMINISTRATIVE CODE
TITLE 13. LAW AND PUBLIC SAFETY
CHAPTER 20. ENFORCEMENT SERVICE
SUBCHAPTER 43. ENHANCED MOTOR VEHICLE INSPECTION AND MAINTENANCE PROGRAM

Current through February 2, 1998; 30 N.J. Reg. No. 3

13:20-43.7 Test frequency

Motor vehicles subject to inspection pursuant to this subchapter shall be inspected on a biennial basis, except as otherwise provided by law or regulation. Whenever a vehicle previously registered in a foreign jurisdiction is registered in this State, the vehicle shall be presented for inspection within 30 days from the date of issuance of a certificate of registration for the vehicle. Following completion of the inspection of a vehicle which was previously registered in a foreign jurisdiction, the vehicle shall be inspected on a biennial basis, except as otherwise provided by law or regulation.

<General Materials (GM) - References, Annotations, or Tables>

NJ ADC 13:20-43.7
END OF DOCUMENT

State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection
Office of Air Quality Management
Bureau of Air Quality Planning
P.O. Box 418
Trenton, NJ 08625-0418
Phone (609) 292-6722
Fax (609) 633-6198

Robert C. Shinn, Jr.
Commissioner

FAX TRANSMITTAL COVER SHEET

DATE: Feb. 27, 1998

TO: William Muszynski, Deputy Regional Administrator

FAX NUMBER: (212) 637-5024 **PHONE NUMBER:** (212) 637-5024

FROM: John C. Elston, Administrator
Air Quality Management

TOTAL NUMBER OF PAGES FAXED: 4
(INCLUDES COVER SHEET)

COMMENTS: Attached please find the cover letter to the proposed revision to New Jersey's inspection and maintenance State Implementation Plan. The original with the State Implementation Plan will be sent to you, via express UPS mail service.

State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection
Office of Air Quality Management
401 East State Street
P.O. Box 418
Trenton, New Jersey 08625-0418
Phone: (609) 777-1345
Fax: (609) 633-6198

Robert C. Shinn, Jr.
Commissioner

February 25, 1998

John M. Daniel, Director
Office of the Air Division
Virginia Department of Environmental Quality
629 E. Main Street, 8th Floor
Richmond, VA 23219

Dear Mr. Daniel:

SUBJECT: THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION (NJDEP)'S PROPOSED REVISION TO NEW JERSEY'S BASIC INSPECTION AND MAINTENANCE (I/M) PROGRAM STATE IMPLEMENTATION PLAN (SIP): CHANGE FROM ANNUAL TO BIENNIAL TESTING

Enclosed please find a copy of the NJDEP's proposed Basic I/M SIP revision, referenced above. We are sending you this proposed SIP revision both as a courtesy and pursuant to the requirements of 40 CFR §51.102, the EPA regulations regarding notice to those other states included, in whole or in part, in the regions which are significantly impacted by such a proposal.

The proposed SIP revision clarifies that, during the transition period from the existing basic to the enhanced I/M program, all inspections (including basic inspections) will be conducted on a biennial, rather than an annual cycle. Shifting to biennial testing at the beginning of the transition period is expected to allow the transition to the enhanced I/M program to proceed far more swiftly and efficiently than if the State were to continue to require basic I/M inspections on an annual basis. The resulting reduced number of vehicles to be tested will allow testing centers to dedicate more of their resources to conversion of inspection lanes.

The proposed SIP revision also sets forth a demonstration that the emission reduction benefits that the I/M program will achieve during the transition period are at least equivalent to the benefits New Jersey has been achieving under the basic I/M program. The demonstration is being made pursuant to the General Savings Clause (Section 193) of the Clean Air Act (42 U.S.C. 7515) which states: "No control requirement...in effect before [November 15, 1990]...may be modified

...unless the modification insures equivalent or greater emission reductions...." The proposed SIP revision shows that any resultant shortfall in emission reduction benefits for the ozone precursor pollutant, volatile organic compounds (VOCs), that are due to the reduced frequency of basic I/M inspections will be offset by the additional reductions that will be realized due to the addition of an evaporative test (known as the fuel cap leak test) to the basic I/M program. The proposed SIP revision also demonstrates that any resultant shortfall in emission reduction benefits for the pollutant carbon monoxide (CO) is offset through vehicle fleet turnover from January 1, 1996 through January 1, 1998.

The State's original enhanced I/M program SIP revision (June 29, 1995) discussed how the State envisioned making the transition to the enhanced I/M program by closing centralized inspection stations and beginning a biennial inspection cycle while these lanes were retrofitted on a staggered basis. However, the State did not, in either the June 29, 1995 SIP revision or the State's subsequent enhanced I/M program SIP revision on March 27, 1996, clearly describe how the emission reductions of the basic program would be sustained during the transition period.

This proposed SIP revision does not entail changes to the I/M program rules of either the NJDEP or the DMV.

The NJDEP is seeking comment from the public on the proposed SIP revision. Written and/or oral testimony concerning the SIP revision will be received at a public hearing to be held on:

March 31, 1998 at 10:00 a.m.
Main Lobby Public Hearing Room
New Jersey Department of Personnel
44 S. Clinton Avenue
Trenton, New Jersey

This hearing is being held in accordance with the provisions of the Air Pollution Control Act (1954), N.J.S.A. 26:2C and the Administrative Procedures Act, N.J.S.A. 52:14B.

Written comments relevant to the proposed SIP revision may be submitted until close of business **April 3, 1998**, and should be directed to:

Ann Zeloof, Esq.
DEP Docket Number **09-98-02/657**
Office of Legal Affairs
New Jersey Department of Environmental Protection
PO Box 402
Trenton, N.J. 08625-0402

Additional copies of the proposal may be obtained by contacting this office. Copies can also be downloaded electronically from the Department's Air Quality Regulations Bulletin Board. The data line number for the Bulletin Board is (609)292-2006 (Data bit: 8; Parity: N; Stop bit:1). The file,IM98SIP.ZIP, is located in file area #35 (Air: Props, Adopts & Notices). The file contains

WordPerfect v5.1, ASCII and Lotus 123 v.1 formatted documents. These documents are also available from the Office of Air Quality Management's website at: http://www.state.nj.us/dep/aqm.

If you have any questions concerning the submittal, please feel free to call Bureau Chief Dave West at (609) 530-4035.

Sincerely,

Felice Weiner, Rule Manager
Office of Air Quality Management

cc: James Sydor, w/enclosure

State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection
Office of Air Quality Management
401 East State Street
P.O. Box 418
Trenton, New Jersey 08625-0418
Phone: (609) 777-1345
Fax: (609) 633-6198

Robert C. Shinn, Jr.
Commissioner

February 25, 1998

Joseph Belanger, Director
Planning and Standards
Bureau of Air Management
Connecticut Department of Environmental Protection
79 Elm Street
Hartford, CT 06106

Dear Mr. Belanger:

SUBJECT: THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION (NJDEP)'S PROPOSED REVISION TO NEW JERSEY'S BASIC INSPECTION AND MAINTENANCE (I/M) PROGRAM STATE IMPLEMENTATION PLAN (SIP): CHANGE FROM ANNUAL TO BIENNIAL TESTING

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made pursuant to the General Savings Clause (Section 193) of the Clean Air Act (42 U.S.C. 7515) which states: "No control requirement...in effect before [November 15, 1990]...may be modified ...unless the modification insures equivalent or greater emission reductions...." The proposed SIP revision shows that any resultant shortfall in emission reduction benefits for the ozone precursor pollutant, volatile organic compounds (VOCs), that are due to the reduced frequency of basic I/M inspections will be offset by the additional reductions that will be realized due to the addition of an evaporative test (known as the fuel cap leak test) to the basic I/M program. The proposed SIP revision also demonstrates that any resultant shortfall in emission reduction benefits for the pollutant carbon monoxide (CO) is offset through vehicle fleet turnover from January 1, 1996 through January 1, 1998.

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If you have any questions concerning the submittal, please feel free to call Bureau Chief Dave West at (609) 530-4035.

Sincerely,

Félice Weiner, Rule Manager
Office of Air Quality Management

cc: Bill Menz, w/enclosure

State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection
Office of Air Quality Management
401 East State Street
P.O. Box 418
Trenton, New Jersey 08625-0418
Phone: (609) 777-1345
Fax: (609) 633-6198

Robert C. Shinn, Jr.
Commissioner

February 25, 1998

Barbara A. Kwetz, Director
Division of Air Quality Control
Massachusetts Department of Environmental Protection
One Winter Street, 7th Floor
Boston, MA 02108

Dear Ms. Kwetz:

SUBJECT: THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION (NJDEP)'S PROPOSED REVISION TO NEW JERSEY'S BASIC INSPECTION AND MAINTENANCE (I/M) PROGRAM STATE IMPLEMENTATION PLAN (SIP): CHANGE FROM ANNUAL TO BIENNIAL TESTING

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Ann Zeloof, Esq.
DEP Docket Number **09-98-02/657**
Office of Legal Affairs
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PO Box 402
Trenton, N.J. 08625-0402

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If you have any questions concerning the submittal, please feel free to call Bureau Chief Dave West at (609) 530-4035.

Sincerely,

Felice Weiner, Rule Manager
Office of Air Quality Management

cc: Nancy Seidman, w/enclosure
Tom DeNormandie, w/enclosure

State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection
Office of Air Quality Management
401 East State Street
P.O. Box 418
Trenton, New Jersey 08625-0418
Phone: (609) 777-1345
Fax: (609) 633-6198

Robert C. Shinn, Jr.
Commissioner

February 25, 1998

Merrylin Zaw-Mon, Director
Air and Radiation Management Administration
Maryland Department of the Environment
2500 Broening Highway
Baltimore, MD 21224

Dear Ms. Zaw-Mon:

SUBJECT: THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION (NJDEP)'S PROPOSED REVISION TO NEW JERSEY'S BASIC INSPECTION AND MAINTENANCE (I/M) PROGRAM STATE IMPLEMENTATION PLAN (SIP): CHANGE FROM ANNUAL TO BIENNIAL TESTING

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PO Box 402
Trenton, N.J. 08625-0402

Additional copies of the proposal may be obtained by contacting this office. Copies can also be downloaded electronically from the Department's Air Quality Regulations Bulletin Board. The data line number for the Bulletin Board is (609)292-2006 (Data bit: 8; Parity: N; Stop bit:1). The file,IM98SIP.ZIP, is located in file area #35 (Air: Props, Adopts & Notices). The file contains WordPerfect v5.1, ASCII and Lotus 123 v.1 formatted documents. These documents are also

available from the Office of Air Quality Management's website at: http://www.state.nj.us/dep/aqm.

If you have any questions concerning the submittal, please feel free to call Bureau Chief Dave West at (609) 530-4035.

Sincerely,

Felice Weiner, Rule Manager
Office of Air Quality Management

State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection
Office of Air Quality Management
401 East State Street
P.O. Box 418
Trenton, New Jersey 08625-0418
Phone: (609) 777-1345
Fax: (609) 633-6198

Robert C. Shinn, Jr.
Commissioner

February 25, 1998

Kenneth A. Colburn, Director
Air Resources Division
New Hampshire Department of Environmental Services
64 North Main Street, Caller Box 2033
Concord, NH 03302-2033

Dear Mr. Colburn:

SUBJECT: THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION (NJDEP)'S PROPOSED REVISION TO NEW JERSEY'S BASIC INSPECTION AND MAINTENANCE (I/M) PROGRAM STATE IMPLEMENTATION PLAN (SIP): CHANGE FROM ANNUAL TO BIENNIAL TESTING

Enclosed please find a copy of the NJDEP's proposed Basic I/M SIP revision, referenced above. We are sending you this proposed SIP revision both as a courtesy and pursuant to the requirements of 40 CFR §51.102, the EPA regulations regarding notice to those other states included, in whole or in part, in the regions which are significantly impacted by such a proposal.

The proposed SIP revision clarifies that, during the transition period from the existing basic to the enhanced I/M program, all inspections (including basic inspections) will be conducted on a biennial, rather than an annual cycle. Shifting to biennial testing at the beginning of the transition period is expected to allow the transition to the enhanced I/M program to proceed far more swiftly and efficiently than if the State were to continue to require basic I/M inspections on an annual basis. The resulting reduced number of vehicles to be tested will allow testing centers to dedicate more of their resources to conversion of inspection lanes.

The proposed SIP revision also sets forth a demonstration that the emission reduction benefits that the I/M program will achieve during the transition period are at least equivalent to the benefits New Jersey has been achieving under the basic I/M program. The demonstration is being made pursuant to the General Savings Clause (Section 193) of the Clean Air Act (42 U.S.C. 7515)

which states: "No control requirement...in effect before [November 15, 1990]...may be modified ...unless the modification insures equivalent or greater emission reductions...." The proposed SIP revision shows that any resultant shortfall in emission reduction benefits for the ozone precursor pollutant, volatile organic compounds (VOCs), that are due to the reduced frequency of basic I/M inspections will be offset by the additional reductions that will be realized due to the addition of an evaporative test (known as the fuel cap leak test) to the basic I/M program. The proposed SIP revision also demonstrates that any resultant shortfall in emission reduction benefits for the pollutant carbon monoxide (CO) is offset through vehicle fleet turnover from January 1, 1996 through January 1, 1998.

The State's original enhanced I/M program SIP revision (June 29, 1995) discussed how the State envisioned making the transition to the enhanced I/M program by closing centralized inspection stations and beginning a biennial inspection cycle while these lanes were retrofitted on a staggered basis. However, the State did not, in either the June 29, 1995 SIP revision or the State's subsequent enhanced I/M program SIP revision on March 27, 1996, clearly describe how the emission reductions of the basic program would be sustained during the transition period.

This proposed SIP revision does not entail changes to the I/M program rules of either the NJDEP or the DMV.

The NJDEP is seeking comment from the public on the proposed SIP revision. Written and/or oral testimony concerning the SIP revision will be received at a public hearing to be held on:

March 31, 1998 at 10:00 a.m.
Main Lobby Public Hearing Room
New Jersey Department of Personnel
44 S. Clinton Avenue
Trenton, New Jersey

This hearing is being held in accordance with the provisions of the Air Pollution Control Act (1954), N.J.S.A. 26:2C and the Administrative Procedures Act, N.J.S.A. 52:14B.

Written comments relevant to the proposed SIP revision may be submitted until close of business **April 3, 1998**, and should be directed to:

Ann Zeloof, Esq.
DEP Docket Number **09-98-02/657**
Office of Legal Affairs
New Jersey Department of Environmental Protection
PO Box 402
Trenton, N.J. 08625-0402

Additional copies of the proposal may be obtained by contacting this office. Copies can also be downloaded electronically from the Department's Air Quality Regulations Bulletin Board. The data line number for the Bulletin Board is (609)292-2006 (Data bit: 8; Parity: N; Stop bit:1). The

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If you have any questions concerning the submittal, please feel free to call Bureau Chief Dave West at (609) 530-4035.

Sincerely,

Felice Weiner, Rule Manager
Office of Air Quality Management

cc: Bob Scott, w/enclosure

State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection
Office of Air Quality Management
401 East State Street
P.O. Box 418
Trenton, New Jersey 08625-0418
Phone: (609) 777-1345
Fax: (609) 633-6198

Robert C. Shinn, Jr.
Commissioner

February 25, 1998

John Kahill, Commissioner
New York State Department of Environmental Conservation
50 Wolf Road
Albany, NY 12233-1010

Dear Mr. Kahill:

SUBJECT: THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION (NJDEP)'S PROPOSED REVISION TO NEW JERSEY'S BASIC INSPECTION AND MAINTENANCE (I/M) PROGRAM STATE IMPLEMENTATION PLAN (SIP): CHANGE FROM ANNUAL TO BIENNIAL TESTING

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Office of Legal Affairs
New Jersey Department of Environmental Protection
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If you have any questions concerning the submittal, please feel free to call Bureau Chief Dave West at (609) 530-4035.

Sincerely,

Felice Weiner, Rule Manager
Office of Air Quality Management

cc: Dick Gibbs, w/enclosure

State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection
Office of Air Quality Management
401 East State Street
P.O. Box 418
Trenton, New Jersey 08625-0418
Phone: (609) 777-1345
Fax: (609) 633-6198

Robert C. Shinn, Jr.
Commissioner

February 25, 1998

Donald Wambsgans
Air Resources Management Division
Environmental Regulation Administration
Department of Consumer & Regulatory Affairs
2100 Martin Luther King Jr. Avenue, S.E.
Suite 404
Washington, D.C. 20020-5732

Dear Mr. Wambsgans:

SUBJECT: THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION (NJDEP)'S PROPOSED REVISION TO NEW JERSEY'S BASIC INSPECTION AND MAINTENANCE (I/M) PROGRAM STATE IMPLEMENTATION PLAN (SIP): CHANGE FROM ANNUAL TO BIENNIAL TESTING

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Ann Zeloof, Esq.
DEP Docket Number **09-98-02/657**
Office of Legal Affairs
New Jersey Department of Environmental Protection
PO Box 402
Trenton, N.J. 08625-0402

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If you have any questions concerning the submittal, please feel free to call Bureau Chief Dave West at (609) 530-4035.

Sincerely,

Felice Weiner, Rule Manager
Office of Air Quality Management

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF LEGAL AFFAIRS
P.O. BOX 402
TRENTON, NEW JERSEY 08625-0402
(609) 292-0716
FAX: (609) 984-3488

M E M O R A N D U M

TO: Felice Weiner
Air Quality Management

FROM: Ann Zeloof, Esq.
Office of Legal Affairs

SUBJECT: Public Notice - Enhanced Inspection and Maintenance (I/M) Program/State Implementation Plan (SIP) Proposed Revisions - Notice of Public Hearing

DATE: April 28, 1998

Enclosed are copies of the comments we have received to date on the above-referenced proposal, together with a log of the comments. Please check the log against the comments, and advise this office immediately of any discrepancies.

If you have any questions, please call me at 2-0716.

c: DAG Cathy Tormey, Division of Law (w/enc.)
DEP Docket No. 09-98-02/657

OFFICE OF LEGAL AFFAIRS
COMMENTS RECEIVED - DOCKET 09-98-02/657
04-28-98 (DATE OF PRINTOUT)

DATE REC'D	POSTMARK	FAX/HANDCARRY	DEP DKT. NO.	LASTNA/SENDER	FIRSTNA	COMPANY/INDIVID	ADDRESS	TOWN	STATE	ZIP	COMMENTS
04-03-98	04-02-98		09-98-02/657	ADAMS	RUTH ANN	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	DWYER	GREGORY V.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	DWYER	BONNIE MAUVA	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
03-27-98	03-26-98		09-98-02/657	EVERETT, JR	ROBERT J.	AUTOMOTIVE SVC ASSOC OF NJ	912 ROUTE #9	BAYVILLE	NJ	08721	
04-03-98	04-02-98		09-98-02/657	FERBER	RICHARD C.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	FORD	KENNETH	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	GUARINO, JR	JOE	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	GUNDLAH	ARTHUR T.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	HAZZARD	MARK T.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	HERGERT	DAVE	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	HERGERT	SARAH	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-28-98	04-22-98		09-98-02/657	JOHNSON	CARL	NY STATE DEPT ENV CONSERV	50 WOLF ROAD	ALBANY	NY	12233	
04-03-98	04-02-98		09-98-02/657	KENNEY	MARCIA	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	KENNEY	JAMES T.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	KORYBSIC	BOB	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	LABOR, JR.	KARL	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION

OFFICE OF LEGAL AFFAIRS
COMMENTS RECEIVED - DOCKET 09-98-02/657
04-28-98 (DATE OF PRINTOUT)

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04-03-98	04-02-98		09-98-02/657	LUSCHER	GARY	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-23-98	04-17-98		09-98-02/657	MOW	VINCENT J.	WAEKON INDUSTRIES INC	1674 KIRKWOOD PIKE	KIRKWOOD	PA	17536	
04-17-98		04-17-98	09-98-02/657	MOW	VINCENT J.	WAEKON INDUSTRIES, INC.	1674 KIRKWOOD PIKE	KIRKWOOD	PA	17536	
04-21-98	04-15-98		09-98-02/657	MUSZYNSKI	WILLIAM J.	USEPA	REGION 2, 290 BROADWAY	NEW YORK	NY	10007	
04-03-98	04-01-98		09-98-02/657	NYLANDER	DOUGLAS	ON SITE AUTOMOTIVE SVCS, INC.	1773 GREENWOOD AVE	TRENTON	NJ	08609	
04-03-98	04-02-98		09-98-02/657	RILEY	PETER	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	RITCHIE	R.E.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	RITCHIE	R.M.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	RUIZ	LUIS	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION

Count: 25

New York State Department of Environmental Conservation
Office of Air & Waste Management, Room 608
50 Wolf Road, Albany, New York 12233-1014
Phone: (518) 457-1415 FAX: (518) 457-9629

John P. Cahill
Commissioner

APR 21 1998

Ms. Ann Zeloof, Esq.
Office Of Legal Affairs
New Jersey Department of Environmental Protection
P.O. Box 402
Trenton, NJ 08625-0402

Re: DEP Docket Number 09-98-02/657

Dear Ms. Zeloof:

The New York State Department of Environmental Conservation (the Department) appreciates the opportunity to provide comments on the New Jersey Department of Environmental Protection's (NJDEP) proposed revision to New Jersey's Basic and Enhanced Inspection and Maintenance (I/M) Program State Implementation Plan (SIP). This proposed revision is of concern to the Department because our two States, along with Connecticut, share a common metropolitan area, the New York, New Jersey, Connecticut Consolidated Metropolitan Statistical Area (NY-NJ-CT CMSA). Actions taken by New Jersey to control air pollution affect the levels of air pollution entering New York and Connecticut.

The Department has reviewed New Jersey's proposed SIP revision, and EPA's Interim Final Rule dated May 14, 1997 (62 FR 26401) for the Approval and Promulgation of Implementation Plans; New Jersey; Motor Vehicle and Inspection and Maintenance Program, and offers the following comments:

The schedule of New Jersey's proposed enhanced I/M program does not comply with EPA's interim final rule which became effective June 13, 1997. New Jersey had intended to start the enhanced I/M program by November 15, 1997, but no later than February 1, 1998. The program did not start on either date, and is in fact scheduled to start January 1, 2000. As such, New Jersey will not comply with the 18-month National Highway System Designation Act (NHSDA) short-term evaluation clock, which will expire December 14, 1998. 40 CFR 52.1580 notes, "If New Jersey fails to start its program by November 15, 1997, the interim approval granted under the provisions of the NHSDA, which EPA believes allows the State to take full credit in its 15 percent plan for all the emission reduction credits in its proposal, will convert to a disapproval after a finding letter is sent to the State by EPA." To our knowledge, EPA has not prepared such letter, and is now obligated to do so.

Also, since New Jersey's I/M program is proposed to start in January 2000, any emission credits taken in any Rate-of-Progress plans for this program for the years 1996 and 1999 are not approvable.

In addition, the Department has evaluated the modeling preformed to support the expected emission reduction credits, and offers the following comments:

1. Final Cut Points: New Jersey's modeling appears to use final cut points before any cycles of the I/M program are completed. A full cycle using the final cut points should be completed before modeling credit can be claimed. As New Jersey's enhanced I/M program is to be a biennial program, two years must be completed using final cut points. To claim this credit for January 1, 2002, the final cut points must be used no later than January 1, 2000. Since this coincides with the proposed start date, standard recommended practice would be to use phase-in cut points during the first cycle i.e. two years of the program. In particular, Section 85.1(a)(2) of EPA-AA-RPSD-IM-96-2 (Acceleration Simulation Mode Test Procedures, Emission Standards, Quality Control Requirements, and Equipment Specifications - FINAL Technical Guidance) states: "Final ASM Standards should only be used after at least one cycle of operation using the start-up standards in Section 85.1(a)(1)." Therefore, it appears to be inappropriate to model for the final cut points until January 1, 2004.

2. Change of Ownership Inspections: The modeling assumes that almost two-thirds of used vehicle purchasers will voluntarily submit their vehicle to an I/M test. This assumption may not be justified. However, even if this estimate is correct, only half of the vehicles re-inspected would be within a year of their last inspection. That is, for a biennial program, half of any random subset of inspected vehicles would include vehicles inspected from one to two years prior. Thus, the Total Expected Annual Off-Cycle Inspections Value given in Table III should be 465,490 (415,340 + 50,000 + 150), rather than 880,830. Therefore, the percent of "annual" inspections is 13.4% (465,490 / 3,465,830) and not 25.4%.

3. Mechanic Training: The commitment for repair technician training and certification as made in the proposed SIP revision may not support the claim of 100% credit. In accordance with EPA's Office of Mobile Source's document, "I/M Flexibility Options and Emission Reduction Credits," dated February 27, 1995, any State that requires training and certification of all technicians, and requires vehicles to be repaired by trained technicians, may receive full credit.

4. Locally Specific Inputs: Except for the non-normalized age arrays used, all other inputs including vehicle mix, speed and hot/cold starts appear to be model defaults. Per EPA Guidance, "Procedures for Emission Inventory Preparation, Volume IV: Mobile Sources," EPA-450/4-81-026d (revised), July 1992, I/M should be modeled for locality-specific inputs.

Any one of the comments above are reason for disapproval of this submission.

The Department would once again like to thank New Jersey for the opportunity to comment on this proposal.

Sincerely,

Carl Johnson
Deputy Commissioner
Office of Air & Waste Management

cc: Commissioner John Cahill (DEC)
Jeanne Fox (EPA-Region II)
Jason Grumet (NESCAUM)
Bruce Carhart (OTC)

WAEKON INDUSTRIES INC

CORPORATE HEADQUARTERS 1674 Kirkwood Pike, P.O. Box 90, Kirkwood, PA 17536
TELEPHONE (717) 529-6000
FAX (717) 529-6111

April 13, 1998

Ann Zeloof
NJDEP
Office of Legal Affairs
P.O. Box 402
Trenton, NJ 08625-0402

RE: DEP Docket #09-98-02/657

Dear Ms. Zeloof:

This letter is in response to the public notice given for NJDEP's Proposed I/M SIP Revision for biennial testing. Waekon Corporation has been producing evaporative emission testing equipment since 1994 and actively participated in the development of EPA I/M Guidance from late 1994 to early 1995. In 1995, our parent company, Hickok Inc., was the first to introduce generic OBD scan tool capabilities in cooperation with Ford Motor Co. We currently manufacture the Waekon FPT series of Fuel Cap Adapters, updated annually, BAR97 certified and warranted for life. We also produce two different handheld models of Fuel Cap Testers, with a third fully automated and electronic communications capable model, the FPT27, to be released shortly. Waekon was also the first to produce an automated fuel tank pressure test system in 1995, for which we received the Motor Magazine Top 20 Tools of the Year award.

As a Pennsylvania manufacturer we take great interest in the programs of neighboring states. We currently supply evaporative testing equipment to the State of Delaware and are working as closely as possible with Maryland as they contemplate evaporative emission testing. Consistent with our interest in this region, we have sought to participate constructively in the development of New Jersey's program over the past several months and have made clear our commitment to provide equipment tailored to the needs of your program. In the spirit of a concerned stakeholder we, therefore, offer the following comments.

1. We strongly endorse the inclusion of fuel cap and tank pressure testing as one of the most practical measures available to any state program for reducing emissions of VOC's. After years of direct research and development efforts, we are confident of the significant emission reduction benefits that accrue to evaporative testing and repair.
2. Considering that the current plan calls for no NOx testing in the state until as late as January 1, 2000, it is even more imperative that hydrocarbon emissions from all possible mobile sources be effectively controlled, in order to assure appropriate ground level ozone reduction.
3. Since the basis for emission reduction credits relies heavily on your centralized testing system, it seems crucial that no measure be introduced that would encourage motorists to avoid centralized lanes. We consider the exclusion of fuel cap testing from the decentralized segment of the hybrid mix to have just such negative consequences in addition to sending a negative message to the motoring public and private test and repair technicians concerning the value of evaporative testing.

4. During the interim period prior to inauguration of an enhanced program, evaporative reductions from decentralized cap testing could be used to offset the 45 TPD VOC shortfall to remedy the state's disapproved 15% ROP plans.

5. In Section IV C. of the current proposed SIP revision there is reference to "an attempt to alleviate any unnecessary additional financial burden on the private repair community", as the intended result of avoiding decentralized cap testing. In recent months, Waekon has sold significant quantities of inexpensive manual fuel cap testing equipment to professional automotive technicians all over the U.S. who are not even associated with emission testing programs. Any professional technician who wishes to service post 1996 OBDII equipped vehicles must have fuel cap testing equipment in order to diagnose the evaporative portion of the OBDII system. Therefore, the cost-effective equipment Waekon is providing for use in standard automotive repairs should not be considered financially burdensome to the professional repair community.

6. In order to minimize any perceived financial burden, Waekon is willing to provide our basic manual I/M Fuel Cap Testing System to the private New Jersey repair community at promotional pricing. In addition, while the cap adapter portion of the set would be retained for subsequent use in the enhanced program, Waekon will offer a credit on the manual tester when the repair shop upgrades to our FPT27 electronic tester.

7. We believe these measures would provide a significant enhancement to your current SIP revision and the overall program; while relieving the proposed disparity between the centralized and decentralized portions of the program, without undue financial hardship on the professional repair community.

8. We strongly recommend the inclusion of decentralized cap testing in your revised SIP, in order to better insure the acceptance of your proposal to the regional administrator of the Federal EPA and provide excess credit towards New Jersey's 15% ROP shortfall.

We look forward to your response to our comments as well as any inquiry you may have regarding our ability to assist in developing a viable evaporative emission-testing program in New Jersey.

Respectfully,

Vincent J. Mow

Vincent J. Mow
Technical Development
Waekon Industries, Inc.

cc: Peter Vinci, President Waekon div.
Bob Bauman, Chairman Hickok
Joel Bouve', General Counsel

Christine Schell

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF LEGAL AFFAIRS
P.O. BOX 402
TRENTON, NEW JERSEY 08625-0402
(609) 292-0716
FAX: (609) 984-3488

MEMORANDUM

TO: Felice Weiner
Air Quality Management

FROM: Ann Zeloof
Office of Legal Affairs

SUBJECT: Public Notice - Enhanced Inspection and Maintenance (I/M) Program/State Implementation Plan (SIP) Proposed Revisions - Notice of Public Hearing

DATE: April 3, 1998

I enclose the comments we have received to date on the above-referenced proposal, together with a log of the comments.

If you have any questions, please call me at 2-0716.

c: Sandra Chen, Air Quality Management
DAG Howard Geduldig
Dkt. No. 09-98-02/657

a:weiner.657

OFFICE OF LEGAL AFFAIRS
COMMENTS RECEIVED - DOCKET 09-98-02/657
04-03-98 (DATE OF PRINTOUT)

DATE REC'D	POSTMARK	FAX/HANDCARRY	DEP DKT. NO.	LASTNA/SENDER	FIRSTNA	COMPANY/INDIVID	ADDRESS	TOWN	STATE	ZIP	COMMENTS
			09-98-02/657								
			09-98-02/657								
04-03-98	04-02-98		09-98-02/657	ADAMS	RUTH ANN	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	DWYER	BONNIE MAUVA	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	DWYER	GREGORY V.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
03-27-98	03-26-98		09-98-02/657	EVERETT, JR	ROBERT J.	AUTOMOTIVE SVC ASSOC OF NJ	912 ROUTE #9	BAYVILLE	NJ	08721	
04-03-98	04-02-98		09-98-02/657	FERBER	RICHARD C.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	FORD	KENNETH	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	GUARINO, JR	JOE	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	GUNDLAH	ARTHUR T.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	HAZZARD	MARK T.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	HERGERT	SARAH	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	HERGERT	DAVE	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	KENNEY	MARCIA	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	KENNEY	JAMES T.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	KORYBSIC	BOB	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	LABOR, JR.	KARL	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION

OFFICE OF LEGAL AFFAIRS

COMMENTS RECEIVED - DOCKET 09-98-02/657

04-03-98 (DATE OF PRINTOUT)

DATE REC'D	POSTMARK	FAX/HANDCARRY	DEP DKT. NO.	LASTNA/SENDER	FIRSTNA	COMPANY/INDIVID	ADDRESS	TOWN	STATE	ZIP	COMMENTS
04-03-98	04-02-98		09-98-02/657	LUSCHER	GARY	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-01-98		09-98-02/657	NYLANDER	DOUGLAS	ON SITE AUTOMOTIVE SVCS, INC.	1773 GREENWOOD AVE	TRENTON	NJ	08609	
04-03-98	04-02-98		09-98-02/657	RILEY	PETER	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	RITCHIE	R.E.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	RITCHIE	R.M.	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION
04-03-98	04-02-98		09-98-02/657	RUIZ	LUIS	PROF AUTO TECH ASSOC	P.O. BOX 5220	DEPTFORD	NJ	08096	PETITION

Count: 23

ON SITE AUTOMOTIVE SERVICES, INC.

♦♦♦

1773 Greenwood Ave ♦ Trenton, NJ 08609
Phone (609) 586-5308 ♦ Fax (609) 586-9635

Dep Dkt 09-98-02/657

March 31, 1998

Felice Weiner
Rules Manager
NJDEP
Office of Air Quality
401 East State St.
Trenton, NJ 08625-0418

Dear Ms. Weiner,

I would first like to thank you and your department for giving us this opportunity to be heard on March 31, 1998 for the proposed SIP changes. We must all work together to get this program implemented.

Some of the concerns that PTF centers have is they must make a major investment in equipment in order to participate in the program without an assurance if the program will stay intact for us to recover our investment. The two year program will hurt the PTF centers as far as revenue goes to recover the investment in equipment which may cause technicians to be laid off and unemployment to raise in our state. The major deterrent to a two year program is the issue of safety. It seems that the focus is on the eviroment and we are overlooking the impact of having vehicles on the road that are a great safety risk. Two years is a long time for a vehicle to be on road systems without a safety inspection. I see many vehicles now with a one year inspection process enter my establishment that are a great risk to drive and when I inform the customer of my findings their response in some cases is they will wait until the vehicle is due for inspection and they have to fix it. We will be putting more lives in danger with a two year program.

I remember when on the back of a inspection sticker it read "New Jersey the safest state". It no longer appears on the sticker. What we have to ask is are we compromising one safty for another and if so why can't we have both.

Sincerely,

Douglas Nylander
ASE Certified Master Technician

Professional Auto Technicians Association
P.O. box 5220
Deptford,New Jersey 08096
1-800-463-5461
609-346-0060

Ann Zeloof
Office of Legal Affairs
NJDEP
401 E. State Street
4th Floor
Trenton, New Jersey 08625

Subject: Written comments to proposed SIP revision.
Docket # 09-98-02/657

Dear Ms. Zeloof:

Enclosed you will find our signed copy of the letter read at the SIP revision hearing on Tuesday, March 31, 1998. Also enclosed are Petitions Opposing Early Implementation of Biennial NJ Inspection. All items enclosed apply to Docket # 09-98-02 / 657.

Yours truly,

Richard C. Ferber
Member of Professional Auto Technicians Association
Member of Automotive Service Association of New Jersey
European Auto Service
35 North Maple Avenue
Marlton, New Jersey 08053
Work 609-985-0003
Fax 609-985-0564
E-Mail ggtc38a@prodigy.com

Professional Auto Technicians Association
P.O. Box 5220
Deptford, New Jersey 08096
1-800-463-5461
609-346-0060

Ms. Felice Weiner
Rules Manager
State of New Jersey Department of Environmental Protection
Office of Air Quality Management
401 East State Street
Trenton, New Jersey 08625-0418

March 31, 1998

Dear Ms. Weiner,

Subject: Proposed Revision to New Jersey's Basic Inspection and Maintenance (I/M) Program State Implementation Plan (SIP): Change from Annual to Biennial Testing

We the membership of Professional Auto Technicians Association are opposed to the early or any form of biennial mandated vehicle inspection testing at this time. We believe that, during this transition from basic to enhanced programs, the current 3700 Private Inspection Centers (PIC) would be more than able to handle any additional emission and safety inspections that may be incurred while the central inspection lanes are under construction.

Our reasons for this opposition are:

- Loss of revenue for all the current PICs.
- The lack of any incentive for a PIC to become a Private Inspection Facility (PIF).
- The absolute small gains in gas cap inspection and newer fleet turnover verses testing and repairing major gross polluting vehicles.
- The lack of any incentive for the New Jersey motoring public to take advantage of enhanced I/M testing.

- The major impact on New Jersey air quality and environment.

- Aside from the emissions concerns, is the safety of every motorist in New Jersey because of the proposed changes to frequency of the I/M tests.

Our recommendations for the SIP would be to continue the current annual frequency of the mandated vehicle inspection with all the benefits of which follow:

- Keep annual I/M inspections until the approximate drop dead date of March 31, 1999.

- The loss of any revenue to the current PICs would be kept to a minimum.

- Combined gas cap and I/M inspection will be a step forward for the air quality of New Jersey.

- Offer and advertise that the enhanced emission testing that would be available from PICs that have or will have operational ASM 5015 equipment making it possible for environmentally aware New Jersey motorists to do their share towards continued improvement to the New Jersey air quality.

- Offer and advertise a voucher program to PICs to offset the more expensive ASM 5015 test. This would be a very large two-fold advantage:

    1. Offers incentive for PICs to get involved early in enhanced emissions tests.

    2. Makes New Jersey's motoring public aware of proposed changes early on, and smoothes or eases the transition into enhanced emission testing.

- No need for United States Environmental Protection Agency (USEPA) to give approval for any changes due to increased emissions during the transition.

As a side bar to proposed revisions to SIP, we surely understand the NJ DMV's eagerness to inform the motoring public of the proposed biennial I/M program, but we believe that the press release about the biennial Basic I/M program on March 27,1998 was premature and capricious. We would like to think that this

hearing today may be able to give us a constructive way to voice concerns and implement changes and is not merely a formality.

The membership of Professional Auto Technicians Association would like to thank the DEP for giving us the opportunity to voice our concerns on this SIP. We believe that our recommendations are within the framework of the enhanced I/M program and take the air quality of New Jersey and the safety of its motoring public into consideration. We also believe that this continued open dialogue between NJ DEP, MVS and PICs can only benefit New Jersey's motorists and environment. Please feel free to contact us in the event you need additional information or input.

Yours truly,

Richard C. Ferber
Member of Professional Auto Technicians Association
Member of Automotive Service Association of New Jersey
European Auto Service
35 North Maple Avenue
Marlton, New Jersey 08053
Work 609-985-0003
Fax 609-985-0564
E-Mail ggtc38a@prodigy.com

Petition Opposing Early Implementation of Biennial NJ Inspection

We the undersigned, as interested parties in the NJ Enhanced I/M Program, OPPOSE the early implementation of Biennial Vehicle Inspections on July 1 1998. Early implementation will cause unnecessary economic hardship on many repair facilities. Biennial inspections are opposed in general, but based on acknowledgement of the policy change being a probable necessity for the overall success of the new program, a January 1, 1999 beginning would lessen the impact significantly.

Signature	Print Name	Address
1. Jim Kenny	JAMES T KENNY	3582 Nottingham Way Trenton NJ
2. Marcia Kenny	MARCIA KENNY	3582 NOTTINGHAM WAY TRENTON, NJ 08690
3. Rick Ferber	Rick Ferber	311 North Fork Lane Rd Mystic Shore NJ
4. Mark T Hazard	MARK T HAZARD	PO BOX 103 Stockton NJ 08559
5. Sarah Hergert	SARAH HERGERT	143 Greendell Rd Newton NJ 07860
6. Dave Hergert	DAVE Hergert	143 GREENDELL Rd Newton NJ
7. Joe Guarino Jr	JOE GUARINO JR	45 PLAUDERVILLE AVE GARFIELD NJ
8. Luis Ruiz	Luis Ruiz	76 GARDEN ST. EDISON, N.J.
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Signature	Print Name	Address
1.	ARTHUR T GOODMAN	20 4th Ave HAWTHORNE NJ 07506
2.	Gary Loscher	20 4th Ave Hawthorne NJ 07506
3.	[redacted]	[redacted]
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Petition Opposing Early Implementation of Biennial NJ Inspection

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Automotive Service Association of NJ
Mechanical Division
912 Route # 9, Bayville, NJ 08721
Phone: (732) 269-9893 Fax: (732)269-6789

Ms. Felice Weiner
Rules Manager
State of New Jersey
Department of Environmental Protection
Office of Air Quality Management
401 East State Street
PO Box 418
Trenton, NJ 08625-0418

March 27, 1998

Dear Ms. Weiner:

Let me first apologize for not being available to testify in person at the NJDEP hearing on March 31, 1998 of proposed SIP changes. With the short notice, a previous responsibility could not be changed.

As the Automotive Service Association of New Jersey, we are opposed to the early implementation of biennial inspection. While we recognize that a commitment to biennial inspection was made long ago, our point of view holds that this is a major area of concern for shops debating participation in the new PIF program. Implementation at this time will cause increased economic hardship in our industry, remove the only reasonable incentive to encourage early participation in the PIF program, and will have a negative impact on air quality.

Recent contact with DMV and DEP has provided us with some insights into several of the areas of concern about the overall implementation of the new program. The State is clearly committed to a strong network of PIFs, and is depending on the private network to assist in launching this program. However, several factors have called into question the level at which the current PICs will participate in the new program. Considering that the overall plan has the PIFs continuing to inspect about 30% of the vehicles, widespread participation is needed to make this program successful. The decision to participate or not is becoming one of great difficulty for many repair facilities. In general, our industry has been slumping. The last few winters have been mild, the last few summers not particularly hot. New car leases, extended warranties and better quality, more complex vehicles are all significant factors. The loss of revenue from biennial inspection will make it more difficult to make this commitment.

The State also is hoping that several shops will invest in the PIF program early, which would allow them to collect some real world data on the new testing procedure.

Understanding that the public would not be forced to take the new enhanced emission test, the offer of a two year inspection sticker would seem to be the most logical and reasonable incentive to encourage the public to voluntarily participate. Very few, if any, customers would subject their vehicle to a more stringent, more expensive emission test without such an incentive. This in turn leads to the common sense conclusion that few shops would make the large financial investment of the PIF before it became mandatory.

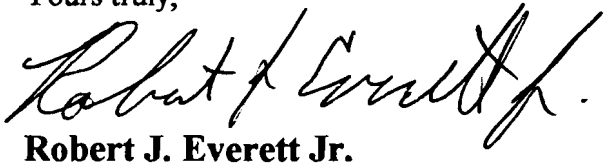
Also of concern is the impact on air quality of biennial emission testing with the current test method. Claims of off setting gains from gas cap inspections and a newer fleet seem dubious at best. Catching one gross polluter with an emission test is likely to have a much greater effect on air quality then a few bad gas cap seals.

Our suggestion for this revision to the SIP would be delay of the biennial inspection until January 1, 1999, the benefits of which follow.

- With the full implementation of the enhanced program to be set for approximately April 1, 1999, this would allow a three month transition period.
- The beginning of the change on the first of the year would also help eliminate confusion from mid year introduction.
- It would delay the economic factor of reduced inspection revenue to the PICs, which in turn would help them perhaps decide to participate in the PIF program.
- Continued emission inspection of every vehicle, combined with the new gas cap test, would improve air quality and help offset the initial impact when biennial does begin.
- And finally, an offer of a two year sticker could be established for any vehicle that voluntarily took the enhanced test early. This would provide an economic incentive for early investment and commitment to the new program by PICs and provide an avenue for the data collection needed by the State.

We would like to thank the DEP for the opportunity to present our point of view on this matter. We feel we have presented a reasonable suggestion that would help reach the established goals of the new enhanced I/M program. Your consideration of our suggestion is much appreciated. Please feel free to contact us in the event you need additional information or input.

Yours truly,



Robert J. Everett Jr.
1st VP ASA/NJ Mechanical Division
Bayville Auto Care, Inc.

PRINT PLEASE

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

[redacted] REGISTRATION CARD

Name: Rick Ferber

Firm or Organization: ASA-NJ DATA + European Auto Service

Position: President

Mailing Address: Street: 35 North Myrtle Ave Marlton NJ 08053

City / State / Zip

SIP Revision

Hearing Subject

I do [T] do not [ ] plan to testify.

PRINT PLEASE

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

[redacted] REGISTRATION CARD

Name: DAVE SCALER

Firm or Organization: MECHANIC'S EDUCATION ASSN

Position: TECHNICAL TRAINING DIRECTOR

Mailing Address: Street: MAPLEWOOD NJ 07040

City / State / Zip

ANNUAL / BIANNUAL

Hearing Subject

I do [X] do not [ ] plan to testify.

PRINT PLEASE

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

[redacted] REGISTRATION CARD

Name: James T Kenney

Firm or Organization: Automotive Specialists Inc

Position: Pres.

Mailing Address: Street: Trenton NJ 08629

City / State / Zip

IM 50/15

Hearing Subject

I do [X] do not [ ] plan to testify.

2

PRINT PLEASE

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

[redacted] REGISTRATION CARD

Name: JILL DRESSLER

Firm or Organization: NEW JERSEY CONSUMER Ref

Position: EX DIR

Mailing Address: Street: 66 MORRIS Ave

City / State / Zip: SPRINGFIELD NJ 07081

Hearing Subject

I do [X] do not [ ] plan to testify.

6/10/98

c: John, Kate, Christine, Erin.
Fx: Dave, Tom W. DMU

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUN - 8 1998

Mr. Dennis L. Merida, P.E.
Division Administrator
Federal Highway Administration
840 Bear Tavern Road, Suite 310
Trenton, New Jersey 08628-1019

Dear Mr. Merida:

As you are aware, on February 26, 1998, New Jersey proposed a revision to their vehicle inspection and maintenance (I/M) state implementation plan (SIP) that is intended to convert the current program's testing frequency from annual to biennial during the retrofitting phase of the construction contract. Because the State's Request for Proposal (RFP) for the enhanced I/M program is based upon this conversion, the Federal Highway Administration requires the Environmental Protection Agency's (EPA's) approval of the SIP revision before allowing the State to open the bids received.

EPA proposed approval of this revision on May 13, 1998. Our approval is based upon the conversion of the testing frequency not occurring until after the State awards the construction contract. In addition, the State's concurrent implementation of the gas cap test will provide the replacement volatile organic compound air emission reduction credits for those that will be lost by this conversion.

On June 5, 1998, New Jersey finalized this I/M SIP revision. As a result of EPA's review, there were no significant changes in the final revision from the State's proposal. EPA will be finalizing approval of New Jersey's I/M frequency conversion shortly. Therefore, bids received for the State's I/M program can be opened.

Thank you for seeking our approval of this issue. Should you need any additional information, your staff may contact Judy-Ann Mitchell of my staff at (212) 637-3708.

Sincerely yours,

Ronald J. Borsellino, Chief
Air Programs Branch

cc: J. Elston, NJDEP

10:06A

STATE OF NEW JERSEY

COUNTY OF MERCER

CITY OF TRENTON

IN THE MATTER OF: *

* TRANSCRIPT

THE PUBLIC HEARING HELD ON * OF

THE PROPOSED I/M SIP REVISION* PROCEEDINGS

(BIENNIAL TESTING CYCLE) *

- - - - - - - - - - - - - - - -

CHANNEL 6 WPVI-TV BUILDING

44 SOUTH CLINTON AVENUE

TRENTON, NEW JERSEY 08650

TUESDAY, MARCH 31, 1998

SCHULMAN, CICCARELLI & WIEGMANN

CERTIFIED SHORTHAND REPORTERS

EDISON TOMS RIVER ATLANTIC CITY

(732) - 494 - 9100

B E F O R E:

JOHN ELSTON, ADMINISTRATOR of the OFFICE OF AIR QUALITY MANAGEMENT in the DEPARTMENT of ENVIRONMENTAL PROTECTION

DAVID WEST, CHIEF of the BUREAU OF TRANSPORTATION CONTROL

CHRIS SALMI, CHIEF of the BUREAU of AIR QUALITY PLANNING

HOWIE GEDULDIG, DEPUTY ATTORNEY GENERAL

TOM WRIGHT, ACTING PROJECT MANAGER for the ENHANCED INSPECTION and MAINTENANCE PROGRAM

MICHAEL KLEWIN, ENVIRONMENTAL SPECIALIST

KAREN HENRY, C.S.R.

LICENSE NO. XI01852

I N D E X

HEARING OFFICER: Good morning and welcome. I am John Elston, Administrator of the Office of Air Quality Management in the Department of Environmental Protection, or DEP, and I will be the hearing officer this morning.

With me on my far left is David West, Chief of our Borough of Transportation Control; my immediate left is Chris Salmi, Chief of our Bureau of Air Quality Planning; and on the far right is Deputy Attorney General Howie Geduldig. Also joining me today on the panel from the Division of Motor Vehicle Tom Wright, Acting Project Manager for the Enhanced Inspection and Maintenance Program.

The purpose of today's hearing is to accept comments on proposed changes to the New Jersey's Motor Vehicle Inspection and Maintenance, or I/M, State Implementation Plan. The State of New Jersey is proposing to change the frequency of the mandated gasoline powered motor vehicle inspection test.

The current basic I/M test is required annually. The forthcoming enhanced I/M test is required biennially, that is every two years.

10:07A The proposed SIP revision clarifies that, during the transition period from the basic I/M program to the enhanced I/M program, all inspections, whether basic or enhanced, will be conducted on a biennial rather than an annual cycle. The switch to biennial testing will reduce the volume of vehicles presented for inspection while the program is undergoing staff adjustments and the inspection stations are being retrofitted with the equipment necessary to conduct the enhanced I/M test. This should ease and speed the transition to the enhanced I/M program by accelerating the reconstruction, retrofitting and operation of the inspection stations and by reducing any inconvenience to the motorist. For this, and a host of other administrative reasons, it is most appropriate to begin

conducting the I/M program on a biennial basis with commencement of the fiscal year. This will also ensure an adequate period of time for transition for the State. Accordingly, this test frequency change will take effect on July 1, 1998. This is consistent with the State's original enhanced I/M program SIP revision of June 29, 1995, which discussed how the State envisioned making the transition to the enhanced I/M program by closing centralized inspection stations and beginning a biennial inspection while these lanes were retrofitted on a staggered basis.

During this transition there will be a loss of remission reduction benefits expected from the basic I/M program since vehicles will be tested every other year. However, as is demonstrated in the proposed SIP revision, any emission-reduction benefit loss will be offset by three emission reduction mechanisms:

One. The addition to the basic

I/M program of a test to check for gas caps which release more volatile organic compound emissions than expected.

Two. The greater than accepted improvement in new car technology reflected in the vehicle fleet turnover not already considered in the State's plans. This has been caused by both the larger number of new car sales in New Jersey and by a slower rate of in-use deterioration of these newer vehicles during the first few years after sale.

And three. The additional benefits gained by vehicles which, after failing the enhanced test, are repaired by skilled service technicians trained in the latest diagnostic procedures. As a result the emission reduction benefits the I/M program will achieve during the period of transmission are at least equivalent to, and probably greater than, the benefits achieved under the current basic I/M program.

The State is making this demonstration pursuant to the General

Savings Clause, Section 193, of the Clean Air Act, 42 U.S.C. 7515, which states: "No control requirement in effect before November 15, 1990 may be modified unless the modification insures equivalent or greater emission reductions."

Now, let me refer to some procedural matters of this hearing. This proposed SIP revision does not entail regulatory changes to the I/M program for either DEP or DMV. A full explanation of the proposed modifications of the State's existing I/M program is contained in the State's proposed revision to the I/M SIP. Copies of the proposed SIP revision are available on the table outside this hearing room.

Notice of the proposed revision to the I/M Program SIP and today's hearing appeared in the New Jersey's Register on March 2, 1998. In addition timely notice was also published in six newspapers circulated in New Jersey. Notices of the hearing and the availability of the proposed SIP revision

were also mailed to over seven hundred interested parties.

After the public hearing the entire record will be reviewed by the DEP and the DMV including the comments received at this hearing as well as any written comments submitted. The comment period will close at the end of business April 3, 1998. Those wishing to provide written comments on the proposed SIP revision should send them to Ann Zeloof, that's Z-e-l-o-o-f, care of, DEP Docket Number 09-98-02, which is the date, and then -657, Office of Legal Affairs, New Jersey, Department of Environmental Protection, CN-402, Trenton, New Jersey 08625. The State will carefully consider all comments. A summary of the public comments and agency responses will be included in the SIP revision submitted to the US Environmental Protection Agency. Anyone desiring a copy of today's hearing transcript should make arrangements with the hearing stenographer.

Please note that this is a

public hearing not an adversarial proceeding. Those who comment will not be sworn in as witnesses. No debate or cross-examination will be permitted. Those who comment may be asked questions from the hearing panel. Any person wishing to present comments relative to the purpose of this hearing may speak. This hearing will continue until all persons who are present and desire to speak have had an opportunity to present their comments.

As with every public hearing on a proposed SIP revision your comments should be limited to the changes to the program which is the subject of this hearing. While the DEP and the DMV welcome your thoughts and comments on any aspect of any of their programs or program rules, these are best addressed to the DEP and the DMV outside of this forum. In addition the members of the panel will be available for informal discussion and to respond to any questions you may have regarding New

Jersey's I/M program which are not part of this proposed SIP revision.

If you have copies of your prepared written statements, please leave one copy with the hearing stenographer. The DEP and DMV will attempt to respond to your questions or issues at this hearing. However, the technical and legal complexity of some issues may restrict us from replying to all questions today at this hearing. Let me assure you that both the DEP and the DMV will listen closely to your comments, and upon completion of a full technical and legal review of the issues raised will publish responses with the SIP revision.

Everyone present should have filled out a registration card at the registration desk. Anyone who wishes to testify should have indicated so on the registration card. When your name is called, please come forward, state your name and spell it for the benefit of the stenographer. Also state the name of your organization, company or interest

that you represent. Thank you.

Now, at this time I have three of those registered who wish to testify and I will take them in the order that they appeared. It is now about 10:20 and what we will do I will take testimony from these individuals. Perhaps at that time we can have a break and see if any more wish to testify after that time. So with that I'll call the first name I have is James Kenney.

MR. KENNEY: Good morning. My names is James Kenney, K-e-n-n-e-y. I'm the owner of Automotive Specialists, Inc., 1432 Hamilton Avenue, Trenton, New Jersey.

HEARING OFFICER: If you would like you can sit down, make yourself at home.

MR. KENNEY: Okay. I would like to express my concerns regarding the proposed biennial inspection program.

One. You will now in reality create gross polluters.

Two. You will greatly increase

the number of unsafe vehicles on the road with such safety hazards as bad brakes, tires and unsafe front ends.

Three. The economical hardship on the PICs/PIFs businesses by cutting our inspection volume in half.

Four. You have taken all the incentive away from the PICs/PIFs to get involved in the program early.

We propose voluntary I/M 50/15 testing by letting the PIFs with new equipment give two-year stickers where the vehicles that passed the I/M 50/15 test. PICs without the new equipment should still give a one-year sticker. This could help the PICs and the public to become involved early in the program. It would also help shorten centralized lanes. Early involvement by the PICs enable the State to collect data on testing being done which is needed to stay in compliance with the current RFP that is out for bid at this time. Also, it will allow time to resolve any problems that may arise before full

enactment of this new program.

In closing we feel the proposed biennial inspection in conjunction with the sixty-five-mile-an-hour speed limits and the increased number of unsafe vehicles will create increased auto fatalities and a higher concentration of air pollution. Not cleaner air. Thank you.

HEARING OFFICER: Okay. Thank you very much. I have a question for you, Jim.

MR. KENNEY: Sure.

HEARING OFFICER: Your proposal, let me repeat it and see if I have it right, is that those Private Inspection Facilities, if they would purchase equipment, that those, just that group would be allowed to issue a two-year inspection sticker while those who not buy the equipment will continue to have one-year inspection stickers. Is that the proposal that you would have?

MR. KENNEY: Yes.

HEARING OFFICER: I guess the

question is how many do you think, for example, there's a ramping up that eventually the centralized inspection stations will be ramping up on a traditional program from the basic program by a full enhanced system. How long do you think the private -- can it be done concurrently? How many stations do you think it will take, could you get early, let's say, in the system you described?

MR. KENNEY: If we had a firm commitment from the State of New Jersey in writing that this is what's going to happen and when it's going to happen, and the trust has been restored to the PIC/PIF community, I think you would find a large number of the inspection centers getting involved.

Right now the biggest concern out on the street from the people I talk to and the meetings I go to is: "What if this happens? What if that happens?" They would like to see something written in stone and once you have this done

people will get involved.

There's numerous guys who are saying, "I'm just waiting for the State to tell me, "Yes, in reality this is going to happen. It's not going to change again." That's the big fear. The State is asking us to invest thirty, forty thousand dollars.

10:20A People will do this if they know this program is going to be enacted, when it's going to be enacted and if they can get into early participation, yes. The answer to your question right now is there's thirty-seven hundred PICs. I would say from the feelings and the comments I've heard you could probably, as long as they have the equipment and software and the State is willing to do this, have a minimum of a thousand PICs/PIFs up in running with the new program probably before the end of the year.

HEARING OFFICER: So this incentive keeping one year with those not equipped and two years with those

equipped would provide the necessary incentives to get about a thousand?

MR. KENNEY: Yes, yes. You know I feel this would also give you the data, you know, that you would need.

HEARING OFFICER: Okay. Any other comments? Howie, do you have any?

10:21A MR. GEDULDIG: Yeah. Would you suggest the same annual/biennial split depending on the test type occur during the same period at the centralized that you're advocating at the PICs?

MR. KENNEY: Voluntarily, yes. I think you're going to need voluntarily to get this program up and running, yes. You do you have to take the fear out of the public. If you walk up there one day and say this program is mandatory without any walk-in period to it, I think you're going to have a large group of people that are really afraid and it's going to cause concerns. I already have people coming into the shop that have taken a voluntary program and said, "I don't know what the big stink is about."

10:22A MR. GEDULDIG: If the PICs are going to be allowed to do what you're suggesting on the schedule, do you need the centralized to have the same options during the same period of time?

MR. KENNEY: No, I do not. I do not. I feel that our customers are going to come to us whether the central lanes are issuing two-year stickers or not. I feel the customers we have now are going to continue coming to us for convenience, one-stop shopping, things of this nature.

MR. GEDULDIG: So if you're able to treat them in the manner that you're discussing, obviously you feel it's the most comfortable way to get through this process, you feel there will not be a significant loss or increase and the stability you currently have will be maintained in your client base?

MR. KENNEY: That's correct.

HEARING OFFICER: Tom.

10:24A MR. WRIGHT: Yeah. Let me explain the reason the State is looking

to go biennial. The main reason is to reduce the volume of cars requiring inspections at the centralized lanes.

In our RFP that's out now we specified a pretty aggressive construction phase and we're holding them to implementing mandatory enhanced inspections at the end of, it could be as short as twelve months from the start of construction. In order to do that we need to, some of the lanes need to be closed for the construction and the installation of the equipment. There isn't the capacity required to handle all the cars on an annual basis and therefore some of the lanes need to be closed and we would end up, the other side of it would end up with unacceptably long wait times at the centralized lanes.

The other component on this is under the new rules by the Clean Air Act we're required to do much more extensive auditing and we have talked about some of those things. We need to train those employees for the auditing and we need to

free the employees from lane duties in order to do that. That's our approach to this. We don't think we can delay the biennial period until the construction is finished.

HEARING OFFICER: Any more questions?

MR. KENNEY: My feelings toward that the lanes that are going to be closed it's not going to be all the lanes throughout the State. Again I'm assuming that they they're going to take one station to start, maybe close some of the lanes there, close that station down. The next closest station is not going to be under that same construction period.

The State has come forth and asked the PICs and have told the PICs, "We need you for this program to work." The PIC community says, "We understand this. We are ready, willing and able to do this. Why not take us up on our offer and let us keep your lanes running with the shortest lines possible by doing some of the slack of the inspections, you

know, that we can do by giving the same services that the State does?"

10:26A MR. WRIGHT: It's a good question. Motorists have typically, I guess you're getting about thirty-five percent of the business now?

MR. KENNEY: Right.

MR. WRIGHT: Motorists. That's been increasing over the years. Biennial with the number of cars that come in as a result of transfer ownership will only reduce our workload about thirty-two percent. That was our experience in 1982, 1983 when we did it.

The construction on the lanes we're looking to have each lane closed for two to three weeks. That's been our experience in the two years we closed for the concrete and we're also putting in additional equipment that wasn't in the test lanes which may require more time for the lanes to be closed. With the schedule we placed on the bidders, we believe that we could have as much as twenty percent of the lanes down at any

given time for the next period. There just aren't enough Private Inspection Centers to pick up that slack of people who are willing to take their cars to the Private Inspection Centers. It becomes a customer choice issue and as well as convenience.

HEARING OFFICER: Okay. David.

10:28A MR. WEST: Yeah. Jim, if we assume we were to go ahead with what we're proposing today, which is biennial across the board, are there any other incentives that you could envision that would entice this?

MR. KENNEY: Yes, sir. One thing I think that, I'm not sure how it could be done but I think it's something that somehow could be done, is if the State offered some type of tax credit to a PIC that becomes a PIF with the new equipment. Say if over a four- or five-year period the State said if you stay in compliance with your license, it's not suspended, lost or anything of this nature, at the end of every tax year

we will give you X amount of dollars, tax credit. This way the State will not be shelling out actual cash to anybody. You would not be helping subsidize ownership or payments of equipment. But if I had somebody who was willing to participate in this program that if you possibly give him some type of tax incentive, I'm a business owner, if I know at the end of the year I'm going to get X amount of dollars, tax, to me, that is the same as cash, it's coming off the bottom line or adding to the bottom line. You have to give something to these guys to make them want to participate, like I said before, or a tax credit or something of this nature, I think would really get the attention and would really raise your numbers.

10:29A MR. WEST: Thank you.

HEARING OFFICER: Do you have a number where that might come out? I mean there's different ways of doing tax credits. Some of them, maybe all of them, requires legislation, but I'm

curious as to what that would be and maybe let me take a dollar value first. What would it entail over the course of a year for that to be an incentive?

MR. KENNEY: I would like to see a five thousand dollar a year tax credit.

HEARING OFFICER: Obviously the more the better.

MR. KENNEY: But I am saying if I do get a five thousand dollar a year tax credit, say for four years or --

HEARING OFFICER: I guess I'm saying let's say it's tied to equipment and let's make an assumption the equipment costs fifty thousand dollars and you had a five or ten percent aspect of that, of course it could be depreciated too, I'm pursuing the concept with you a little bit that some percentage would be off of equipment.

MR. KENNEY: A percentage, yes. As long as we have something and we know the State is behind us and is truly participating with us, it's an incentive,

it was something that the PICs would really look into, whether it's a percentage, a dollar figure or whatever.

HEARING OFFICER: Okay. Chris.

10:31A MR. SALMI: No, I'll pass.

HEARING OFFICER: Chris is our master of the stable SIP plan procedurally. He can correct us if we go too far on the SIP revision, but I thought it was a good point to pursue on the incentives here so I wanted to do that.

Any more questions or comments?

MR. GEDULDIG: Yeah. I want to follow up and make sure I'm not confusing your answer to my question and I want to give you an example to clarify at least for me.

If the State-run program, which during this transition period would be a mix of basic/enhanced I/M tests, if the State was offering a biennial inspection to everybody even those coming in basic, is that going to drag people, your current client base away from you when

you can only offer the two-year sticker on the enhanced I/M test?

MR. KENNEY: No, not if we have the equipment.

MR. GEDULDIG: Some of you won't in transitioning?

MR. KENNEY: Some of us will; some of us won't. But a station that has the equipment will be able to offer our customer a two-year sticker if they pass the enhanced test.

10:32A MR. GEDULDIG: That part is the same as the central.

MR. KENNEY: If they fail the enhanced test and they pass a tailpipe test, we would issue a one-year sticker.

MR. GEDULDIG: Now, knowing that the client coming in and knowing that and also knowing that if you went to the centralized lanes, no matter what happened would you get a biennial sticker? Are you going to be harmed? Are you concerned that you may be harmed?

10:33A MR. KENNEY: I don't think so. I don't think the customer base that the

PICs and PIFs have now is going to change drastically to the stations. I think they're going to stay where they are.

MR. GEDULDIG: The customer loyalty.

MR. KENNEY: Customer loyalty, convenience, and if they do go to the lanes and fail, they're going to come back to us and we'll be able to have the capabilities of giving a retest and if we retest on the enhanced system be able to issue the two-year sticker.

So, personally, I do not think that it's going to harm us. Yes, it will affect the guy who doesn't step up to the plate and get the new equipment. He's in a different situation, but the people who step up, make the purchase and get involved, I think it's going to benefit them.

10:34A MR. GEDULDIG: Thank you.

HEARING OFFICER: Mr. Kenney, thank you very much.

MR. KENNEY: Thank you.

HEARING OFFICER: Our next

speaker will be William Dressler.

MR. DRESSLER: Good morning. My name is Bill Dressler. I'm the New Jersey Gasoline Retailer's Association representative. I'm the Executive Director of the Association and my comments this morning are going to be brief but hopefully pointed.

Some of the comments that I've listened to already in the short time that this hearing has been in progress makes some sense to me and, of course, hopefully it makes some sense to others. But there's a different twist on this.

First of all, to involve people in the program that's going to be completely different, in addition to incentives you also have to give them desire. Is it the same? Maybe so, maybe not. The desire to do something is because there is a reward at the end of the day. What is that reward going to be? There isn't any at this point in time. All there is is differences in thinking for the people that are going to

be involved. Do I want to involve myself in this program? How much is it going to cost me? Do I have the ability to do it educationally? There's a lot of questions to be asked, a lot of questions to be answered.

All of this involvement is going to take time, effort and money, dollars. Do our people have the desire to do this at this point in time? I rather doubt it. The equipment is expensive and at this point in time it's not even available. Would it be available by the time it will be required if you decide to purchase it come July 1?

I've been talking to some of the equipment manufacturers about the circumstances they're involved in and the circumstances that the State of New Jersey put forth and they feel that's a very good question. At this point in time I don't think any one of us have answers to that particular question.

As far as education is concerned, if we're going to be doing

10:36A

enhanced emissions tests is there a facility where people don't have ASE certifications can involve themselves in the service repair and repair process, can they get this education at this point in time? There isn't any education that's available to the people to do that. There's no program to test inspectors or train inspectors. There's no programs to test people that don't have certifications. Those are the things we have to determine before we get involved in a program of this magnitude. That's a very deep concern of my membership and of course of mine also.

Of course if we're going to involve ourselves in programs there has to be a reward. It's like the pot of gold at the end of the rainbow and right now there isn't any. Talk about incentives. Jim, the previous speaker talked about incentives. At this point in time, yeah, there should be incentives. It should make desirable for people to involve themselves, but I think

the basics are primary. The basics are is the equipment going to be available? What's the cost of that equipment going to be? Is the educational process available? What's the cost of that education going to be? Those are things that we have to determine before we can involve ourselves in these kinds of programs. I like Jim's numbers. A thousand right from the get-go. I'm a little skeptical about that. Conversations that I've had say, "Hey, nothing in it for me, why should I involve myself?" So we have to make something in it for them, some desire.

There was a question that was asked from the panel, "Are we going to be able to maintain our customer base?" Well, customers are strange people. All of us our customers but we deal with customers too. Let me tell you something from my experience. Customers go to where it's convenient and where they get the most bank for their buck. It has to be attractive for them to come to us.

What that attraction is going to be we have to make a determination on.

I believe in the system that we have. I believe it can work for us, but it needs more than tweaking. It needs some major repair and some of the proposals that we have to come up with to make those major repairs are lacking at this point in time. So I think it's up to the industry and up to the government to get together, have a little more conversation, if possible, do some of the things we're asking you to do so we can involve ourselves.

With those comments I promised you to be brief and I'll end my conversation with you folks right here and then you can ask me any questions if you choose.

HEARING OFFICER: I thank you for your comments and they were heartfelt in a way and I think that's important for you to begin this because you do represent a large base and obviously the desire, the understanding of how a

business person must come forward and look at a process is probably individually based, any membership has a wide range of different desires probably. I was curious as to maybe try to, you know, try to get out of this basic -- let me perhaps ask it a little different.

We have a current program, a basic I/M program. We're talking about in the future an enhanced I/M program and in between is this thing called a transition I/M program. That's what we're talking about here now. It could be long; it could be short in time. Here is where the gamble is: Do you bet up front or do you bet in the back end? You kind of know the back end pretty well, but the enhanced I/M program is going to be like you know what the current program is, should we describe the transition program a little better and how would you be party to this transition program? How does this ramping up work?

I tried to explore with Mr. Kenney earlier the idea of tax credits

and everything else. Where do you see your membership coming in? Could a certain group of your membership come in early on, certain group come in later on? Is there a transition in your own minds of your own members that could work? Is there a transition?

10:40A

MR. DRESSLER: Like everything else profit is the name of the game and everybody works for a dollar. Everybody in this room, if they had no remuneration for their job they wouldn't be in the job they're in. Same thing applies to people that are in our business. If you can show them profit, then they will involve themselves in the transition period. Basically there's no incentive for them to purchase new equipment because there's no profit. If they don't purchase it they do the same thing as if they do purchase it. They give out a two-year sticker. They give a curb idle test and for them to involve themselves and do an enhanced inspection, some of the things that Jim alluded to earlier, maybe

they're necessary, maybe you have to have something there for the individual to look forward to.

10:41A Instead of just dangling a carrot on a stick, give them an opportunity to take a bite of it and that is what's going to get people involved and this transition period is extremely important because the more people you get involved in the transition period the more you're going to wind up with when it becomes mandatory.

If you don't have people in a transition period, they're not getting trained, as I alluded to earlier, they're not putting themselves in a position to adapt to the new program. They're not putting themselves in a position of knowing what their profitability picture might be. Nobody can project one hundred percent what is going to happen in the future, but you have to make plans and you have to make some projections in your own business to determine whether or not you want to involve yourselves.

At this point in time I don't see any objectives that are going to be viable for these people to involve themselves so the transition period is very, very important.

HEARING OFFICER: Okay. Howie?

10:43A MR. GEDULDIG: No questions.

HEARING OFFICER: Tom?

MR. WRIGHT: I want to just talk about the transition period a little bit. You know as of July 1 we're starting to license all current private inspectors as Private Inspection Facilities. The PIF community will start to be licensed and come on-line July 1 and will have until April 1 of 1999 to make their decision to stay in the program. They can stay in the program through that time period using the equipment that they currently have. Part of this was to show them the State is taking affirmative action and that there is both light at the end of the tunnel and also a finite time when the current program will come to an end with the

Private Inspection Centers.

We also look forward to working with you and welcome the opportunity to work with you over the next year or so during this transition period on the issues of education and where people can get those services and we're working with the DEP on some of these issues and we'll keep you involved. We're trying to take a stand on this and trying to get out and meet with the community.

MR. DRESSLER: I think that's commendable, Tom. However, let me make just another comment in respect to the comment you just made about we're going to involve people, but what is there for them to involve themselves in? Do I want to be first? I mean it's nice to be first in line if I have a show to see. If I have to have a ticket, that ticket is going to be additional monies I have to spend to involve myself in the program. It's going to go from twenty-five dollars to seventy-three dollars if I involve myself in all the

action there. If I don't involve myself it's still going to be substantially more investment than I have now. I have to go out and buy equipment again. Do I want to be first? Nice to be first but if I'm going to get into the show I want to be entertained and you're not entertaining me, you're not entertaining my people. So the promises you're making to me are empty at this point in time. We all know from experience that this association has always tried to be as cooperative as we possibly can and that isn't going to change. We're going to try to be as cooperative as we possibly can. We believe in the system that we have, but you have to make it attractive.

If I take you to the dance, when I get home I may not get kissed but you should say thank you to me.

HEARING OFFICER: Thank you for the nice corsage anyway.

Okay. Dave.

10:46A MR. WEST: Just a comment. I understand what you're saying, Bill, but

this is a two-way street.

MR. DRESSLER: Absolutely.

10:47A MR. WEST: In other words, as to your comment regarding equipment we can do the specifications and all that but when it comes to actually marketing that equipment we can't force equipment suppliers to go out and market. We don't have that authority to do that. They're looking for a market. So it's a two-way street. Your members have to be also well-informed that this is going to happen and that this is a good program to do, for them to get into. So it is a two-way street in that respect and I would just like to make that comment.

MR. DRESSLER: Dave, I agree with you one hundred percent and I like the two-way street because I like to go in both directions. Let me go in the direction directly adverse to what you just described. Sure we understand that people are out there looking to sell equipment and you know if we're not going to be players they have a market.

We also understand that they have to make it profitable the same as we have to be profitable. So we are in the process of doing some things necessary for us to prove ourselves and get into the program at a reasonable amount of money.

Yes, two-way streets as far as government and the industries are concerned that's also a two-way street. So I believe that that street has to be narrowed so that when we pass each other we have an opportunity to speak. That's what we have to have here, an opportunity to speak with one another and I hope after this hearing we continue that dialogue and we put ourselves in a position where we make this program successful. But in order to do that you have to make it a little more attractive than you have.

10:48A MR. WEST: Thank you.

HEARING OFFICER: Chris?

MR. SALMI: No.

MR. DRESSLER: Thank you.

HEARING OFFICER: Thank you very much.

Rick Ferber.

MR. FERBER: I'm representing the ASA New Jersey and also PATA, Professional Auto Technician's Association, located in the South Jersey Tri-County area; Burlington, Gloucester and Camden Counties.

I will read the letter from ASA/New Jersey and I'll also submit that and also the PATA letter for further review.

We've also had over the weekend a New Jersey ASA meeting up in Rockland College. Tom Bednar kindly gave his time and went up there and explained the program to the shops and technicians who were involved in the ASA program and want to stay involved and want to continue improving our air quality. He explained the situation what's going on in any of the revisions that have taken place between January when we had Tom and Dave West come down to our PATA meeting and

explain those ramifications.

HEARING OFFICER: Perfect.

MR. FERBER: We do have some petitions from these gentlemen having to do with the biennial which I will submit also to you.

Okay. This is Bob Everett who is the vice president of ASA/New Jersey.

"Let me first apologize for not being available to testify in person at the New Jersey DEP hearing on March 31, 1998 of proposed SIP changes. With the short notice, a previous responsibility could not be changed.

"As the Automotive Service Association of New Jersey, we're opposed to the early implementation of the biennial inspection. While we recognize that a commitment to biennial inspection was made long ago, our point of view holds that this major area of concern for shops debating participation in the new PIF program. Implementation at this time would cause increased economic hardship in our industry, remove the only

reasonable incentive to encourage early participation in the PIF program, and will have a negative impact on air quality.

"Recent contact with DMV and DEP has provided us with some insights into several of the areas of concern about the overall implementation of the new program. The State is clearly committed to a strong network of PIFs and is depending on the private network to assist in launching this program. However, several factors have called into question the level at which the current PICs will participate in the new program. Considering that the overall plan has PIFs continuing to inspect about thirty percent of the vehicles, widespread participation is needed to make this program successful. The decision to participate or not is becoming one of great difficulty for many repair facilities. In general, our industry has been slumping. The last few winters have been very mild, the last few summers not

particularly hot. New car leases, extended warranties and better quality, more complex vehicles are all significant factors. The loss of revenue from biennial inspection will make it more difficult to make this commitment.

10:52A "The State is also hoping that several shops will invest in the PIP program early, which would allow them to collect real world data on the new testing procedure. Understanding that the public would not be forced to take the new enhanced emission test, the offer of a two-year inspection sticker would seem to be the most logical and reasonable incentive to encourage the public to participate. Very few, if any, customers would subject their vehicle to a more stringent, more expensive emission test without such an incentive. This in turn leads to the common sense conclusion that few stops would make the large financial investment of the PIF before it became mandatory.

"Also of concern is the impact

on air quality of biennial inspection testing with the current test method. Claims of offsetting gains from gas cap inspections and a newer fleet seems dubious at best. Catching one gross polluter with an emission test is likely to have much greater effect on air quality than a few bad gas cap seals.

"Our suggestion for this revision to the SIP would be delay of the biennial inspection until January 1 of 1999, the benefits of which follow.

"With the full implementation of the enhanced program to be set for approximately April 1 of 1999, this would allow a three-month transition period.

"The beginning of the change on the first of the year would also help eliminate confusion from mid-year introduction.

"It would delay the economic factor of reduced inspection revenue to the PICs, which in turn would help them perhaps decide to participate in the PIF program.

"Continued inspection of every vehicle, combined with the new gas cap test, would improve air quality and help offset the initial impact when biennial does begin.

"And finally, an offer of a two-year sticker could be established for any vehicle that voluntarily took the enhanced test early. This would provide an economic incentive for early investment and commitment to the new program by PICs and provide an avenue for the data collection needed by the State.

"We would like to thank the DEP for the opportunity to present our point of view on this matter. We feel we presented a reasonable suggestion that would help reach the established goals of the new enhanced I/M program. Your consideration of our suggestion is much appreciated. Please feel free to contact us in the event you need additional information or input.

"Robert J. Everett, Jr., New Jersey/ASA."

Okay. The second letter is from the Professional Auto Technician's Association located in South Jersey.

"We the membership of the Professional Auto Technician's Association are opposed to the early or any form of biennial mandated vehicle inspection testing at this time. We believe that during this transition from basic to enhanced programs, the current thirty-seven hundred Private Inspection Centers would be more than able to handle any additional emission and safety inspections that may be occurred while the central inspection lanes are under construction.

"Our reasons for this opposition are:

"Loss of revenue for all the current PICs.

"The lack of any incentive for a PIC to become a PIF.

"The absolute small gains in gas cap inspection and newer fleet turnover versus testing and repairing

major gross polluting vehicles.

"The lack of any incentive for the New Jersey motoring public to take advantage of the enhanced I/M testing.

"And the major impact on New Jersey air quality and environment.

"Aside from the emissions concerns is the safety of every motorist in New Jersey because of the proposed changes to frequency of the I/M tests. Our recommendations for the SIP would be to continue the current annual frequency of the mandated vehicle inspection with all the benefits of which follow:

"Keep annual I/M inspections until the approximate drop-dead date of March 31, 1999.

"The loss of any revenue to the current PICs would be kept to a minimum. The combination of the gas cap and I/M inspection will be a step forward for the air quality of New Jersey.

"Offer and advertise that the enhanced emission testing that would be available from PICs or PIFs that have

been operational with the ASM 50/15 equipment making it possible for environmentally aware New Jersey motorists to do their share towards continued improvement to the New Jersey air quality. Offer and advertise a voucher program to PICs to offset the more expensive ASM 50/15 test. This would be a very large two-fold advantage:

"One. Offers incentive for PICs to get involved early in enhanced emissions tests.

"Two. Makes New Jersey's motoring public aware of the proposed changes early on and smoothes or eases the transition into enhanced emission testing. Which means there's no need for the United States Environmental Protection Agency to give approval for any changes due to increased emissions during the transition.

"Just as a sidebar to proposed revisions to SIP, we surely understand the New Jersey Department of Motor Vehicle's eagerness to inform the

motoring public of the proposed biennial I/M program, but we believe that the press release about the biennial Basic I/M program on March 27, 1998 was premature and capricious. We would like to think that this hearing today may be able to give us a constructive way to voice concerns and implement changes and is not merely a formality.

"The membership of a Professional Auto Technician's Association would like to thank the DEP for involving us and giving us the opportunity to voice our concerns on this SIP. We believe that our recommendations are within the framework of the enhanced I/M program and take the air quality of New Jersey and the safety of its motoring public into consideration. We also believe that this continued open dialogue between New Jersey DEP, Motor Vehicle Services and PICs can only benefit the New Jersey's motorists and environment.

"Please feel free to contact us in the event you need additional

information or any input from you guys."

So there's actually two different schools of thought, same lines, and I'm open for questions.

HEARING OFFICER: Okay. If I could, I tried to write them down.

MR. FERBER: I wanted to at least get it all out there and I'll address everything if I may.

HEARING OFFICER: On your second letter, I have Mr. Everett's letter here and there's a difference of time when Mr. Everett asked for the transition for the --

10:59A MR. FERBER: PATA, Professional Auto Technician's Association. We rather it be March, for that matter, be annual throughout the enhanced mode.

HEARING OFFICER: Throughout the enhanced mode.

MR. FERBER: Yes.

HEARING OFFICER: I was curious about the voucher program. How would that incentive work?

MR. FERBER: Basically the

incentive involved getting the Private Inspection Centers involved early so they could collect some real world data which is to be available by the end of the year. The actual logistics have to be ironed out.

Basically we were seeing in terms of registration in New Jersey where some percentage goes towards their free inspection. For those motorists who also come to a private inspection center or come to a private inspection station for convenience or we think customer relations it would be a twenty dollar figure. All this could surely be tracked via the enhanced emissions through the registrations, and also your private inspection information, whether it be monthly, semiannually, but that way it gives PIC stations at least a competitive format for them versus the centralized.

As it stands right now we're looking at approximately, and this is probably more on the low side, for a fully enhanced inspection it's going to

be the absolute minimum of fifty-five dollars. Now, that is a large contrast to what the State is proposing as being still free and I might add the biennial.

HEARING OFFICER: So the point, set aside how the registration fee could be set aside, pulled, used as an incentive. I'm not sure how.

MR. FERBER: Neither do I.

HEARING OFFICER: But there could come out a random selection of certain vehicles to go and actually frequent different PIF sites for example for this purpose.

MR. FERBER: I mean we still have to urge the motoring public to address this enhanced mode test. I mean we can buy the machines, but if they're sitting there it doesn't mean they're necessarily willing to do the enhanced mode at a higher rate. So this is something I think to make it convenient to the customer which is the bottom line and keep the lines down at the central inspection while the construction is

going on. I believe the PIFs can handle both sides of that.

HEARING OFFICER: One puzzling thing I was going to ask you do you have experience in Pennsylvania? For example, the question, maybe that's the question. Do you have experience of what is occurring in Pennsylvania under the new ASM test?

11:03A

I'm curious as to the different types of tests, what the repair, we're talking a little bit about the inspection end about the repair. The idea would be that repairs are more expensive under the ASM mode than the idle mode. Do we have any idea at this point the average cost of ASM type of repair as opposed to basic idle type of test?

I bring this up for a couple of reasons. It's a disincentive for the motorist to take an ASM type test. On the other side there is a carrot, if you will, that there will be a higher charge to the motoring public on this and that should be factored into this

whole equation over a period of time. I was wondering if that type of information was available, perhaps not in New Jersey, but in those other states that are beginning to form the programs.

MR. FERBER: Actually I do have several friends that have shops over in Pennsylvania and we do converse on a regular basis. The main reason is we try to find out what our future is in this enhanced mode testing. Generally where the big crux of this whole thing lies is that the cut points on the emissions is the absolute area of whether we're going to get a repair out of this vehicle or it's just going to be skating through at this particular point in time.

Now, as it's set right now, and correct me if I'm wrong, I believe that the cut points are going to be basically the same as our original machine is. In the year 2000 there will be a lower set of cut points. So, yes, there would be some increased incentive from work of this enhanced mode in terms of catalytic

converters, oxygen sensors, that have been and do not get involved in at a curb idle test have to be initiated in under the enhanced mode.

The main idea of the enhanced mode is to get the NOx gas out which has to do with a lot of our ozone here in New Jersey and everywhere else in the country. We agree this is the only test to do to solve all these dilemmas. Our major contest between the state and the PIFs is the amount of money and where customers are going to go. Sure they may eventually come back to us to get repaired but the bottom line is we have to be competitive with the State and that's where the voucher program came in.

As far as Pennsylvania is concerned they have an every year test, an every year safety inspection, and yes, they're getting darn near seventy-six dollars every test. They did come off from a biennial, once every two years emission situation. So they were up in arms initially when they came down to one

but when they saw the revenue coming in they sat back and relaxed.

HEARING OFFICER: In other words Pennsylvania is the reverse of New Jersey. They announced annual and moved it from biennial and that became the incentive?

MR. FERBER: Correct. You understand that's five counties out in Philadelphia. In Pittsburgh they have the curb idle so it's not the enhanced. It's a little bit different. It depends on attainment zones in the counties.

11:06A HEARING OFFICER: I'll turn this over to Dave in a minute. We're beginning to see in the two demonstration lanes a greater rate of NOx failure, exhaust test relative to DOC and CO which may be a higher revenue generator than the DOC and CO testing ends of the thing. I am curious whether that's a potential economic carrot out there in the long run and perhaps I may be searching for these carrots.

MR. FERBER: Potentially you're

correct but it depends on the cut points of the test. If they're very lenient, and from what I gather this is where they're going to stay initially then you're not going to be including the improving the air quality, you're not going to be seeing these repairs inside the facilities. There's your incentive gone, people getting involved in the PIP program.

If you came down heavy duty cut points then we have the public all over us, you and us. So it needs a very fine hand in order to make this happen and I believe the PIFs or PICs are very willing to get involved in it but they have to see some kind of carrot, as you say, to make this viable.

HEARING OFFICER: Okay. Dave, we'll start with you.

11:07A MR. WEST: Yeah. Rick, I was just wondering from a business perspective is the voucher system better

11:08A than an investment tax credit?

MR. FERBER: We'd love to have

both. I don't think that's really a reality situation. It depends on how everybody runs their business. Unfortunately that's the way businesses are run; you make some decisions and other people make other decisions.

What I believe is this is real time money. This is not a tax credit or a carrot until somebody may take it away from them. This is real time. We can do it on a monthly or semiannually program, but something so they can be assured we're getting involved in the program and the money is coming back, this is working real good. I think it's real time data. I think that's what they would like to see. Five thousand dollars would be a nice chunk if you're a good businessman. Sure, that would be great, but I believe a voucher program may be a better benefit for everyone.

MR. WEST: More direct.

MR. FERBER: Exactly.

MR. WEST: Thank you.

MR. FERBER: Sure.

HEARING OFFICER: Chris.

1:09A MR. SALMI: I had a question on the gas cap test. You indicated that a gross emitter may be far greater than a handful of gas caps. That may not be your exact words. How many gas cap failures do you see that are out there?

MR. FERBER: Well, that's a very good question seeing how we've never tested for gas cap. The only time we did a gas cap test was for leaded and unleaded when they were punching out those holes. That was the only time we had any need to go in that area.

As a matter of fact, I'm telling a lot of jobber stores to stock up on those gas caps because we've never had a gas cap station. I'm not sure what they want to do with the ease out system having to do with systems in that compartment. It's surely a component that's going to produce a see coming out vapor which will affect our air quality. I predict a big increase in that seeing we never dealt with it, somebody losing

one or one gets broken off inside.

1:10A MR. SALMI: So they could be substantial?

MR. FERBER: Initially, yes, because we never checked it before.

HEARING OFFICER: Howie?

MR. GEDULDIG: No questions.

HEARING OFFICER: Tom?

MR. WRIGHT: I want to make a couple comments about the communications going out. As we speak we're meeting with consultants who are contracted to step up the efforts on what's going out.

As a side you said the press release that was premature to go out. That wasn't a press release that came in as a report. It was a reporter who was contacted by a garage and was told we were going biennial. That let the cat out of the bag.

MR. FERBER: There was a gentleman I believe from the DEP, Jeffrey Janofsky, who did an interview with KYW, which is a southern talk station, about his comments. Now, the only thing I

wish, and this is probably the same thing with PICs and whatnot, is have everybody get on the same page here. They start getting all this information right and left. I got oodles of phone calls from customers and when I tell service stations what's going on and try to keep them concerned via fax and they hear on the radio they're asking me, "What is this biennial? Are you going up to this hearing to share our concerns?" I see how they're a little bit bent out of shape. I know you can't control a reporter but I think it's premature for you to say anything at this time. You could at least wait an hour before we left the building or something. That's all. I certainly understand you have no control over reporters.

MR. WRIGHT: We are trying to step up our communication efforts with the industry. We are going out and meeting I think an aggressive schedule. We're going to spend a lot of time nights and weekends.

MR. FERBER: Tom is a supporter as well as Dave has come down in January to let us know about the program going on. We couldn't ask for anything more. It's just that we have to get the word out to our memberships to get them involved and get them all on the same page. That's the trick behind all this. It is tough to do that with a scattered format of repair facilities and whatnot that don't always belong to PATA or gasoline resource association or whatnot. So I'm going through jobber stores. They all have to buy parts somewhere. I think that's probably more of a connection kind of thing.

11:12A MR. WRIGHT: To address your comment start delaying the start of biennial to either July or --

MR. FERBER: Not at all.

MR. WRIGHT: -- or March? Not at all.

The RFP that is a out there again calls for mandatory biennial enhanced ASM 50/15 testing by everyone as

early as October 1999. We would need more than three months to retrofit inspection lanes and for everyone out there to get all their equipment. Also, we know that people tend to wait to the last minute.

MR. FERBER: Especially when they have to spend thirty to fifty thousand dollars. I certainly understand their apprehension.

MR. WRIGHT: One of the comments you brought up was loss of revenues from repairs. I suggest you talk to the people from Delaware on the safety side. Delaware recently put in an enhanced brake test which is more sensitive than the current test we're using now. They sensitized this new brake test. We went down there to the local service providers and we had noticed a dramatic increase in the number of great repairs and also the complexity, the diagnosing of what the problem was because of their more sensitive test equipment. So they managed to recoup

some of their loss.

1:14A

MR. FERBER: Granted I'm not saying there's not any problem with the revenue. That's certainly one side of it. It's one of the situations that we have an enhanced emission machine but we as PIFs would not have the luxury of having that kind of brake machine Delaware has.

Delaware, do they have centralized inspection stations?

MR. WRIGHT: Yes.

MR. FERBER: Which is another reason they can afford to have that kind of test at several locations versus several hundred PICs to pick up that kind of thing. We can pull revenues from the lanes to deal with the braking machines. Same with the NOx emissions, we'll be able to pull revenues from that also until it gets to be done and the lanes are open. We have an area there that is a potential loss for I'd say more inspection revenue than I would say

repair because going to biennial so soon. It was more of the inspection related than it really was of actually bringing money in from the other side of the shop from the repair.

11:15A MR. WRIGHT: We've done some audits from the repair bills that we've done randomly through our audit procedure. We found you're not making your money on the inspections. The industry is making the money on the repairs. I actually forget what the average repair came out to be. The average inspection was just under twenty-five dollars.

MR. FERBER: My personal opinion about this whole thing is the actual inspection itself has never really made any money until my Bar 84 machine is paid off. At twenty-seven dollars is what we charge which is half our hourly rate. We're now making money with that machine as versus one payment and scheduled payments and whatnot is a tradeoff of money. I would probably

extend that also to the ASM test. I'm not looking to make money on the actual inspection. I just rather break even and then fine, if we make money on the repair it's great, but it can't be a loss. It's an absolute faux pas to anybody's business to take a loss.

If you're looking at free from the State or at least fifty-five dollars to even make ends meat on the private side and add biennial inspection to that, which means less flow of people. So that's our big concern those two points, okay.

11:17A MR. WRIGHT: Okay.

HEARING OFFICER: Tom?

MR. WEST: You mentioned communication being vital to this. What is the best means for us to communicate with you, newsletter?

MR. FERBER: Is this to PIFs and PICs?

MR. WEST: Yes.

MR. FERBER: Newsletter. As we all get more on-line, by the Internet. I

would say that may even be faster. I'm trying to find the RFP through the treasury thing. God only knows where it is.

MR. WEST: It's not there.

MR. FERBER: Case in point, it's not there.

To have a lot of repair facilities go out and see what the regulations are, that is maybe faster. You can pull it up. I don't even have to be at work. That would be the fastest way. Newsletter would be good. Has to be timely information, has to be accurate information.

I would also suggest some kind of, as Tom was saying, public awareness I guess is a better word, what potentially comes down the road to these people. So it's not hitting them in the face with a ton of bricks. We all need this. Our air needs this. Our safety needs this. Going sixty-five miles an hour on some roads it could be as stupid as a light, but on a foggy day that's what will save

you.

1:18A MR. WEST: Thank you.

HEARING OFFICER: Rich, thank you very much, and I want to thank the three previous speakers.

Right now the time is 11:24. Why don't we adjourn until about 11:45 at which point we will start up again to see if in fact there is anyone else who wishes to testify and go from there. Okay. So we stand adjourned now at 11:24. We'll be back in twenty minutes. Thank you all.

(Whereupon, a brief recess is taken.)

HEARING OFFICER: If we can take our seats, we did entice one more person to come forward. It's Dave Scaler.

MR. SCALER: Dave Scaler of Mechanics Education Association. Most of you know me.

Obviously we are usually looked upon as being an educational organization because we are, but we are also one of

the largest representatives of the independent repair trade. We represent about a thousand technicians currently and my comment is very brief and simple based upon comments that I heard previous today is that we would have great concern of giving centralized lanes a competitive advantage during the transition period. Meaning that there is a, you know, there is some incentive issues which we discussed today which are indeed a problem but it will create more difficulty if the State or centralized lanes were allowed to do biennial testing and as an independent organization or independent repair shop we can only do annual testing. That would be depending on geography, depending on shops. It would be more than just a customer loyalty and customer convenience issue. It would put us at a competitive disadvantage. We have concern over that competitive advantage once that new program comes out if the centralized lanes are good. That is an issue we have

to deal with yet to come. My point is that we would prefer not to have a centralized advantage during the transition.

HEARING OFFICER: Dave, you believe that this will in fact do that, provide an advantage to the centralized during the transitional phase?

MR. SCALER: No. My suggestion is that if it was decided to go with biennial for centralized, basic I/M testing now and annual for the centralized, that is the centralized lanes would have a competitive advantage and we would prefer not to have that. But if both were to go centralized at least biennial.

HEARING OFFICER: If both were to go biennial?

MR. SCALER: If they were both there would no longer be that advantage which, I guess, was my main point.

I'm not sure to answer your question. I don't know I have enough facts to do that. My initial reaction

would be against biennial strictly because of the loss of income, but if that is tied to an incentive to buy new equipment, I can assure you our average shop does approximately thirty-five inspections a month. If I were to lose half that volume that would not by any means make up for the loss of equipment I would lose to get a return on the investment. I would be willing to probably wait. That would not be enough incentive as a business person to make the transition.

HEARING OFFICER: Okay. Dave?

11:46A MR. WEST: No.

HEARING OFFICER: Chris?

MR. SALMI: No.

HEARING OFFICER: Howard?

MR. GEDULDIG: You're obviously responding to my hypothetical.

MR. SCALER: That's correct.

MR. GEDULDIG: Thank you.

HEARING OFFICER: Tom?

MR. WRIGHT: My only comment is that we found when we do biennial rather

than business dropping off by fifty percent it drops off by thirty-two percent. We still do about sixty-eight percent of the previous business because of the resales on cars and requirement to get them re-inspected. So that was just to clarify that point.

HEARING OFFICER: Okay. I have no further comments. So I thank you, David, very much.

Is there anyone else present who wishes to testify? Hearing none then it is now 11:52 I believe I'll adjourn the public section of this SIP revision hearing. Again, I remind you that if you want you can make comments up until April 3 which is this Friday and if you want to clarify anything you said here today we would welcome to hear from that as well.

With that said I believe we'll call this hearing adjourned. Thank you very much.

(Whereupon, the hearing is adjourned at 11:52 a.m.)

C E R T I F I C A T E

I, KAREN HENRY, a Certified Shorthand Reporter and Notary Public of the State of New Jersey, certify that the foregoing is a true and accurate transcript of the stenographic notes as taken by and before me, on the date and place hereinbefore set forth.

Karen Henry, CSR

KAREN HENRY, C.S.R.

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