



City of Cambridge

24.

IN CITY COUNCIL

September 27, 1993

COUNCILLOR WOLF
COUNCILLOR DUEHAY
VICE-MAYOR CYR

WHEREAS: The City of Cambridge is taking an active part in compliance with the Clean Air Act of 1990 by implementing an ordinance that involves transportation control measures; and

WHEREAS: In adopting these ordinances, the City, the business community, and environmentalists have struggled to develop an approach that balances quality of life and environmental concerns with concerns of economic development and development of the city's tax base; and

WHEREAS: The whole State, including other cities and towns, will struggle with these issues also, and citizens will have to respond to these challenges; and

WHEREAS: There is before the State Legislature a bill (H5395) to support the development of an Enhanced Inspection and Maintenance program (Enhanced I/M) for automobiles that will be heard by Committee on September 29; and

WHEREAS: Such an Enhanced I/M program is required under the Clean Air Act and, further, would result in as much as 50% of the reduction in air pollution in Massachusetts as is required under the Act, as the attached documents state; and

WHEREAS: If such as a program is not adopted, there will be a variety of negative results for the State; and

WHEREAS: The City of Cambridge and other municipalities, as well as a variety of businesses, will have to compensate for this inaction by taking stringent action in their domain; now therefore be it

RESOLVED: That the Cambridge City Council endorses the concept of an Enhanced Inspection and Maintenance program to meet the requirements of the Clean Air Act of 1990; and be it further

RESOLVED: That the Cambridge City Council encourages the Legislature to pass legislation that will implement Enhanced I/M.

In City Council September 27, 1993.

Adopted by the affirmative vote of nine members.

Attest:- D. Margaret Drury, City Clerk.

A true copy;

ATTEST:-

D. Margaret Drury

D. Margaret Drury
City Clerk

**WHY ADOPTING
HIGH TECH ENHANCED I/M
IN MASSACHUSETTS
MAKES SENSE**

**Coalition for Enhanced I/M
August 31, 1993**

CAA PROVISIONS

- The 1990 Clean Air Act Amendments passed by the US Congress, lay out a number of measures aimed at reducing air pollution.

- Under Title I, all the regions that have experienced violations of the ambient standard for ozone are designated non-attainment areas and are required to take several steps to be in attainment by a specified date. Massachusetts must demonstrate attainment by 1999.

- Volatile Organic Compounds (VOCs) and Nitrogen Oxides (NO_x), in the presence of sunlight, react to form ozone at ground level. Some measures to reduce VOCs and NO_x are identified under the Act. Others are left up to the state to select.

- Reductions of VOC and NO_x emissions will have to take place. All sectors (private, public, industry, and transportation) will be affected. If reductions do not come from one sector they will have to be added to the ones from another sector.

CAA PROVISIONS

(cont'd)

- Mobile sources are the major contributor of Volatile Organic Compounds (VOCs) and Nitrogen Oxides (NO_x).

- One of the measures required under the Act is the adoption in Massachusetts of an enhanced inspection and maintenance (I/M) program for automobiles. The Act calls for the EPA to set the performance standard for such a program.

- Legislative approval in Massachusetts is required in 1993

- EPA has ruled that the standard for enhanced I/M performance consists of:

- 1) 28% reduction in VOC emissions
30% reduction in CO emissions
9% reduction in NO_x emissions

- 2) Test-only type of facility

CAA COMPLIANCE

- Failure to meet the requirements of the 1990 Clean Air Act Amendments may result in the following penalties:

- Higher emission offset requirements resulting in greater difficulty to grant new permits and slower economic growth**
- Loss of revenue to the Commonwealth (loss of federal funds - as much as \$1.4 billion per year [1])**
- Health hazard to our citizens**
- Legal actions against the Commonwealth**
- Mandatory implementation of federally developed programs**

[1] - According to EPA and MA DEP

ENHANCED I/M TESTING HIGH TECH OPTION

IM 240 TRANSIENT TEST + EVAPORATIVE TEST + PURGE TEST

- High tech enhanced I/M test is the single, most effective air pollution control available.
- High tech enhanced I/M test is the only option that fully meets the enhanced I/M performance standard set by EPA.
- Failure to meet the performance standard will most likely lead to the application of penalties for non-compliance.
- Low cost to society (\$500-800/ton of pollutant).
- Low cost to consumer (\$15-20 every 2 years).
- Implementable in Massachusetts.

WHAT ARE THE OPTIONS?

- If reductions do not come from high tech enhanced I/M, they must be replaced with reductions from other more expensive control options.

- Transportation Control Measures

- Additional emissions reductions from industrial sites (power plants, factories, etc.)

- Further emission controls on small businesses (dry cleaners, bakeries, auto body shops, etc.)

- Bans on the use of certain products (solvents, paints, wood burning, yard equipment, etc.)

COST TO SOCIETY

- High tech enhanced I/M = \$500-800/ton
- Other measures available to replace it:
 - Transportation controls
\$10,000-400,000/ton
 - Further power plant reductions
\$5,000-75,000/ton
 - Tighter car emission standards
\$3,000-300,000/ton
 - Severe reformulation of gasoline
\$25,000-600,000/ton
 - Bans and product reformulation
\$3,000-30,000/ton

Note: Cost estimate ranges were based on values published by government agencies, environmental groups, and industry.

Cost estimates for transportation controls do not reflect benefits from reduced congestion, fewer accidents, etc.

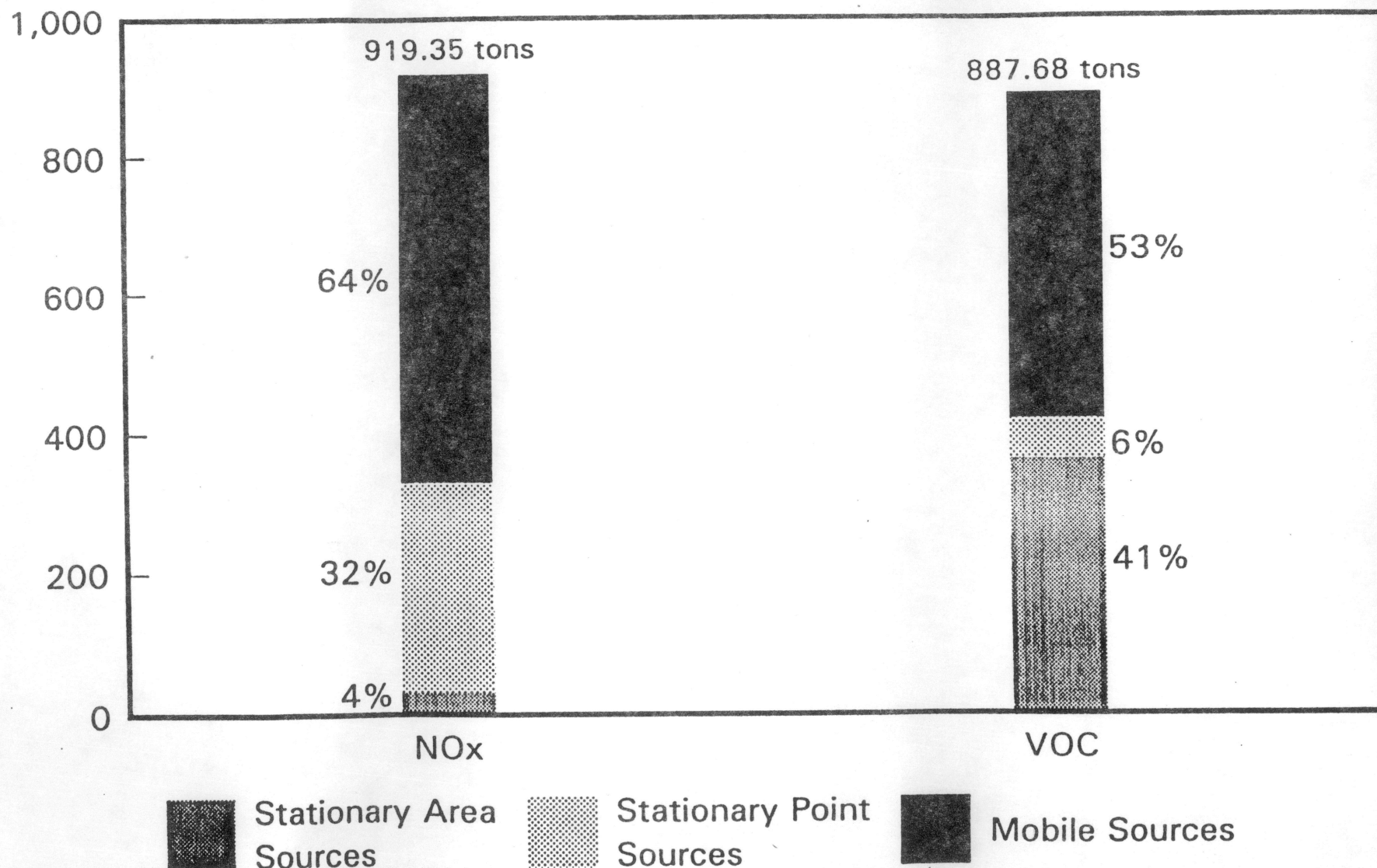
COST TO CONSUMER

- Enhanced I/M:
 - \$15-20 every two years
 - Almost all repairs needed under \$100/car
- Other options:
 - 5-40% increase in electric rates
 - 20-40% increase in gasoline prices
 - \$500-3,000/new car
 - Higher taxes to pay for additional mass transit
 - Increased costs in all products from small businesses
 - Significant behavioral changes:
 - Parking bans and high fees
 - Limitations on car use
 - Fuel switching for heating
 - Unavailability of products

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1990 MASSACHUSETTS NO_x & VOC EMISSIONS

Tons per summer day



Based on 1990 state draft inventory of June 1993

Summary of Final Inspection/Maintenance Rule

Preface

This summary is provided to allow the reader a quick, easy to read review of EPA's Inspection/Maintenance rule. It should not, however, be used as the basis for designing a program.

Background

The control of in-use motor vehicle emissions is crucial to the attainment of clean air. While motor vehicle manufacturers have made tremendous advances in emission control technology, cars and trucks still account for about half of the ozone air pollution and nearly all of the carbon monoxide (CO) air pollution in United States cities, with 10% to 30% of in-use vehicles causing the bulk of the problem. Inspection and Maintenance (I/M) programs reduce mobile source emissions by identifying in-use vehicles in need of engine or emission control repairs.

The Environmental Protection Agency (EPA) has had oversight and policy development responsibility for I/M programs since the passage of the Clean Air Act in 1970, which included I/M as an option for improving air quality. With the passage of the 1977 amendments to the Clean Air Act, I/M was mandated for certain areas with long term air quality problems, while the 1990 amendments to the Clean Air Act (the Act) expand I/M's role as an attainment strategy and require EPA to develop different performance standards for "basic" and "enhanced" I/M programs. The performance standard is the minimum amount of emission reductions a program must achieve, based on a model or benchmark program design. In addition, the Act directs EPA to address requirements for specific design elements and program implementation issues for both basic and enhanced programs. The provisions of the regulation addressing these requirements are summarized below.

Applicability

The Act contains assorted requirements for ozone transport regions (OTR) and specifically establishes one such region in the Northeastern United States, covering Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, and the Consolidated Metropolitan Statistical Area (CMSA) that includes the District of Columbia. Within an OTR, enhanced I/M is required in any metropolitan statistical area (MSA) with a 1990 population of 100,000 or more, regardless of a given area's attainment classification. In the case of a multi-state MSA, enhanced I/M is required in all OTR portions if the sum of these portions equals a population of 100,000 or more, irrespective of the population of the individual OTR state portion.

Outside of an OTR, any area having a 1980 Census-defined urbanized area population of 200,000 or more that has been designated serious or worse ozone nonattainment or moderate to serious CO nonattainment (with a design value greater than 12.7 ppm) must implement enhanced I/M in the 1990 Census-defined urbanized area (at a minimum). Basic I/M must be implemented in 1990 Census-defined urbanized areas with populations of less than 200,000 that have been designated as serious or worse ozone nonattainment or as CO nonattainment with a design value greater than 12.7 ppm. All areas designated as marginal ozone nonattainment or moderate CO nonattainment must continue operating programs that were part of an approved SIP as of November 15, 1990 and, where necessary, must upgrade such programs to meet the requirements of a basic I/M program. In addition, any moderate ozone area must implement a basic I/M program in the 1990 Census-defined urbanized area.

Program coverage is to be MSA-wide and county-wide in subject MSA's in an OTR, except that some rural counties with population densities of less than 200 persons per square mile (as defined by the 1990 Census) can be excluded, as long as at least 50% of the MSA is covered. Outside of an OTR, programs must nominally cover the entire 1990 Census-defined urbanized area. Exclusion of some urban population is allowed as long as an equal number of non-urban residents within the subject MSA are included to compensate for the exclusion. Expansion of the program beyond the required population can no longer be used to demonstrate compliance with the performance standard, but could be used for offsets or could be applied to the reasonable further progress (RFP) requirements of the Act.

Performance Standard

The performance standard allows states flexibility in designing I/M programs as long as such programs result in the same or lower emission targets from mobile sources as that achieved by the relevant model program. SIP demonstrations are to be made with the most current MOBILE model or an alternative approved by the Administrator. Areas shall meet the performance standard for the pollutants which cause them to be subject to I/M. For enhanced I/M areas in nonattainment for ozone, the performance standard must be met for both NOx and VOCs. Basic ozone nonattainment areas must meet the VOC performance standard and prevent NOx increases. If the Administrator finds that NOx emission reductions are not beneficial in a given ozone nonattainment area, then NOx emission targets will not be required to be met by the I/M program for that area.

The basic I/M performance standard is based upon the original New Jersey program and remains essentially unchanged from prior to enactment as a result of EPA's new regulation. The model program includes annual, centralized idle tailpipe testing of model year 1968 and later light duty vehicles (LDV). The standard does not

include testing of heavy duty vehicles or inspection of emission control devices. It also assumes no waivers and full compliance. Programs must be designed such that NOx emission increases, overall, do not occur.

The enhanced model program is based on annual, centralized testing of all model year 1968 and later LDVs and light duty trucks (LDT). Steady-state testing is performed on 1968 through 1985 model year vehicles, while 1986 and later model year vehicles are subject to transient tailpipe emission testing (IM240) and transient evaporative system purge testing. 1983 and later model year vehicles also receive evaporative system pressure tests, while 1984 and later model year vehicles are visually inspected for the presence and proper connection of the catalyst and fuel inlet restrictor. The steady-state cutpoints for 1981 - 1985 model year light duty vehicles are 1.2% CO, 220 ppm HC, and 6% CO+CO₂. The applicable grams-per-mile emission standards for transient-tested vehicles are as follows:

1986-93 LDVs	HC: 0.8	CO: 15.0	NOx: 2.0
1986-93 LDT1 (<6K lbs.)	HC: 1.2	CO: 20.0	NOx: 3.5
1986-93 LDT2 (>6K lbs)	HC: 1.2	CO: 20.0	NOx: 3.5
Tier 1 1994+ LDVs	NMHC: 0.7	CO: 15.0	NOx: 1.4
Tier 1 1994+ LDT1	NMHC: 0.7	CO: 15.0	NOx: 2.0
Tier 1 1994+ LDT2	NMHC: 0.8	CO: 15.0	NOx: 2.5

The enhanced I/M standard includes on-road testing of at least 0.5% of the subject vehicle population, or 20,000 vehicles, whichever is less. The Act also requires testing of a vehicle's onboard diagnostic (OBD) systems for both basic and enhanced programs. EPA will revise relevant sections of its I/M regulation once OBD regulations have been finalized.

Network Type

Enhanced programs must implement a centralized, test-only network unless the state can demonstrate that a decentralized program would be equally effective in achieving the performance standard, based on past performance. The demonstration would have to include, at a minimum, surveys to assess the effectiveness of repairs, rates of tampering, and effectiveness of inspectors at identifying vehicles in need of repair. EPA is not aware of any program that could make this demonstration. A network consisting of testing facilities in which owners and employees only perform official I/M testing (which may include safety-related inspections) and are contractually or legally barred from engaging in motor vehicle repair or service will be considered equally effective to a centralized program. Network design can be test-only or test-and-repair in basic areas, as long as the performance standard is met.

MOBILE model credits for test-and-repair networks are assumed to be 50% less than for a test-only network for the tailpipe emission test, purge test, evaporative system pressure test, catalyst, and gas cap checks; and 75% less for the evaporative canister checks, PCV checks, and air system check. Basic and enhanced I/M areas can receive more prospective SIP credit if the state can demonstrate that past performance supports such additional credit, as described above. Hybrid programs will be modeled based upon the percentage of the fleet tested in test-only versus test-and-repair type facilities.

All I/M programs are required to submit biennial program evaluations to quantify the emission reduction benefits of the program. In enhanced areas, a random, representative sample of at least 0.1% of the subject vehicles shall receive a state-administered or monitored IM240 as part of this evaluation.

Adequate Tools and Resources

A portion of the test fee or a separately assessed per vehicle fee must be placed in a dedicated fund and retained on an annual basis to finance program oversight, management, personnel, and capital expenditures. Alternatives to this approach are acceptable provided the state can demonstrate that adequate funding can be maintained in some other fashion besides reliance on future uncommitted annual or biennial appropriations from the state or local general fund. The SIP must include a detailed program budget, including personnel allocations.

Test Frequency and Vehicle Coverage

Both I/M performance standards include annual testing (as required by the Act) of 1968 and later LDVs, while only the enhanced I/M standard includes LDTs to 8,500 pounds GVWR. Subject vehicles are comprised of vehicles registered or required to be registered and fleets primarily operated within the I/M program area, including leased vehicles and those operated on Federal installations located in the I/M area. Vehicles registered in the program area but primarily operated in another I/M area are to be tested in one or the other of the I/M areas. Alternative vehicle testing schedules and coverage options can be approved, provided the required emission reductions are achieved. EPA encourages biennial testing as a cost effective alternative to annual testing.

Test Procedures and Standards

Valid I/M test procedures include idle, two-speed, steady-state loaded, and transient tailpipe emission testing (IM240), visual emission control device inspections, and purge and pressure testing of the evaporative system. Alternative test procedures may be approved if they can be shown to be equivalent or better in minimizing false failures, correlating to the Federal Test Procedure, and lead to fleetwide emission levels equal to or lower than those achieved by the applicable performance standard. All I/M programs regardless of the tests used are required to implement procedures to ensure accurate testing, allow owner observation of the tests, ensure completion of official tests, provide for use of proper equipment and its calibration, prevent the testing of vehicles in unsafe condition or with missing or leaking exhaust systems, and ensure proper retesting of failed vehicles.

HC, CO, and CO+CO₂ pass/fail standards are to apply to all vehicles and repairs are required for failure of any standard, regardless of the attainment status of the area. NOx pass/fail standards are to apply to vehicles subject to a transient test in ozone nonattainment areas or in an OTR, unless a waiver of NOx control requirements is approved by the Administrator. Pass/fail standards for the visual inspection, pressure and purge tests are given.

Test Equipment

Equipment is to be tested and certified by the program before it is used. The equipment must be able to test all subject vehicles, be adaptable to new technology vehicles, and be automated to the highest degree possible to prevent tampering and abuse and to ensure test integrity. The system must generate a test record for the vehicle owner that includes unique vehicle information, the applicable standards, the results of the tests conducted, warranty information, certification that the tests were conducted in compliance with program requirements, and information concerning possible causes of the specific pattern of high emissions (if any) found during the test. The pass/fail decisions for all measurements must be automatic. The data is to be recorded to an electronic medium, and the system is to regularly perform self checks for recording and calibration accuracy and system integrity. Automatic lockouts should occur if the system is tampered with or if quality control checks are not performed or are failed. Test systems in enhanced areas must include a real-time data link to a host computer to ensure test accuracy and prevent unauthorized multiple initial tests. All manual data entry must be verified.

Quality Control

The regulation includes minimum quality control (QC) requirements to be met by all I/M programs, as well as specific requirements for enhanced I/M programs. The measures addressed include periodic test equipment checks, calibration and maintenance requirements, accuracy specifications, QC recordkeeping requirements, frequency

requirements for QC checks, process automation requirements, and document security requirements. Calibration gas specifications are also detailed. Alternatives or exceptions to the procedures or frequencies may be approved by the Administrator based on a demonstration, including control chart analysis, of equivalent performance.

Waivers

Programs may issue waivers to allow motorists to complete the I/M program requirements without meeting the applicable test standards, provided minimum requirements are met including a minimum expenditure for relevant repairs. The cost of repairs covered by warranty, tampering-related repairs and repairs not performed by a repair technician cannot be assessed toward meeting the minimum expenditure, except that repairs for pre-1980 model year vehicles can be made by non-technicians. A visual check is required to determine that repairs were actually made on vehicles for which waivers are sought. For basic I/M programs, the minimum expenditure is \$75 for pre-81 vehicles and \$200 for 1981 and later vehicles; for enhanced I/M programs, the minimum expenditure is \$450, adjusted annually based upon the Consumer Price Index. One-time-only time extensions not exceeding one inspection cycle may be granted in the case of economic hardship, but must be tracked and reported by the program. Waivers can be issued for less than \$450 if a program is established to scrap vehicles that do not meet standards after the lower expenditure is made.

Programs are required to quality control waiver issuance. In enhanced programs, waivers may only be issued by the state agency (or its contractor), i.e., inspectors cannot issue waivers. In basic programs, inspectors in stations and lanes may issue waivers, provided comprehensive quality assurance procedures are in place to minimize abuse of the waiver system. All programs must inform vehicle owners of potential warranty coverage, insure that repair receipts cannot be revised or reused, insure that waivers are only valid for one test cycle, and track, manage and account for time extensions or exemptions to prevent the improper issuance or use of waivers. The SIP must include a maximum waiver rate to be used in the MOBILE analysis to estimate the emission reductions from the program, with corrective action or SIP revision required if the waiver rate exceeds the rate modelled.

Motorist Compliance Enforcement

I/M programs must be enforced through registration denial unless an existing alternative is proven more effective (in the case of enhanced programs) or as effective (in the case of basic programs); no alternative to registration denial is allowed in newly implementing I/M programs subject to enhanced requirements. Existing sticker-based and computer-matching enforcement programs are the alternative enforcement mechanisms which may be able to meet the Act's requirements.

"Registration denial" means a subject vehicle cannot be registered in an I/M area without first establishing proof of compliance with all applicable I/M program requirements. Pursuant to §207(g)(3) of the Act, the regulation does not require new vehicles to receive emission testing prior to initial retail sale. Minimum requirements for a registration-based enforcement program include: easy visual confirmation of a vehicle's compliance status; a dated compliance certificate which is linked to a specific operator and vehicle; routine citations for operating a vehicle with expired or missing license plates or tags and/or no or expired registration; provision for enforcement by officials other than police (e.g., parking meter attendants) and the citing of parked vehicles; validation of registration changes that would change a vehicle's status from subject to exempt; strict limits on and accounting of exemptions from the testing/registration requirements; and, insurance that vehicle registrations are changed upon moving into an I/M area.

A state considering an alternative enforcement mechanism must demonstrate its equal or superior effectiveness of past performance by comparing the percentage of I/M subject vehicles actually in compliance to the percentage of vehicles complying with the registration requirement. Additionally, sticker-enforced programs must assess the extent to which using stolen, counterfeit, safety only, or expired stickers is a problem. Also, the sticker or identifier used must be clearly visible, unambiguously indicate compliance status, be difficult to counterfeit or steal, and its absence from subject vehicles must result in significant, monetary fines. States pursuing sticker enforcement must also conduct annual, random samples of at least 10% or 10,000 vehicles (whichever is less) as a backup assessment of the compliance rate.

States pursuing computer-matching enforcement must demonstrate that at least 90% of the subject fleet is in compliance within 4 months of the compliance deadline, with significant monetary penalties for non-compliance beyond 4 months, and prevention of vehicle operation for continued noncompliance. All initial notices, warnings, notices of violation and penalty notices must be tracked and reported monthly. The number and percentage of vehicles that never comply (as a result of being junked or moved from the I/M area) must be assessed.

Motorist Compliance Enforcement Program Oversight

Oversight of the motorist compliance enforcement program is required, including quality assurance, quality control, and information management activities. These activities include verification and tracking of vehicle exemptions through physical examination, facilitation of accurate test data, maintenance of an audit trail for all enforcement activities, establishment of written procedures for enforcement personnel (including registration personnel), procedures for disciplining, retraining, or replacing personnel not following established procedures, and prevention of the fraudulent use of inspection documents. Programs

are to evaluate motorist compliance program effectiveness, which requires periodic auditing of test and compliance records, determination of the subject vehicle population, comparison of the testing data base and the registration data base to determine compliance, comparison of these data bases to "red flag" potential non-compliance, and sampling of the in-use fleet.

Quality Assurance

All I/M programs must be quality assured by performing regular audits - both overt and covert. At least two overt audits per test lane must be conducted per year including equipment audits, checks of document security, record keeping, licensing and display information, and evaluation of the inspector's ability to properly perform an inspection. Screening or review of inspector and station records is required at least monthly to identify problems that may indicate potential fraud or incompetence, indicating the need for additional audits. The review is to include computerized analysis, with on-site review of non-covered records, to identify statistical inconsistencies, unusual patterns, and other discrepancies, and should provide for comprehensive accounting of forms that can be used to demonstrate compliance.

Covert audits using vehicles set to fail are required at least once per year per the number of inspectors. In test-and-repair networks, covert audits are to be conducted at least once per station per year, and are to include the purchase of repairs and retesting if the vehicle is properly failed. The program must use a sufficient number of covert vehicles and auditors to avoid detection; the vehicles should cover the range of vehicle technology groups (e.g., carbureted and fuel-injected). Auditors must be trained in program basics including the use of analyzers, air pollution control basics, emissions-related engine repair, emission control systems, evidence gathering, administrative procedures law, and quality assurance practices. The auditors themselves are to be audited at least once annually.

Enforcement Against Contractors, Stations, and Inspectors

The regulation requires programs to develop and submit as part of the SIP penalty schedules setting minimum penalties for violations of program requirements. In the case of contracted systems, the state may use compensation retainerage in lieu of penalties. Inspectors who intentionally pass a failing vehicle will have their licenses suspended for a minimum of six months. Adequate legal authority to effectively enforce the penalty schedule is required. Quality assurance personnel must have the authority to immediately temporarily suspend station or inspector licenses for violations (with supervisory approval). A hearing must be held within 14 days of a written request from the station or inspector, or the temporary suspension will automatically lapse. If a state's constitution precludes such authority to immediately suspend, the program must demonstrate adequate resources and mechanisms to process violations within three business days. The SIP is to

describe the administrative and judicial procedures and responsibilities relevant to the enforcement process.

Data Collection, Analysis and Reporting

Accurate data collection is essential to the management, evaluation, enforcement, and oversight of a state's program and provides vital information to both the program management and EPA. The regulation therefore requires data analysis and reporting, including summary statistics and effectiveness evaluations of the enforcement mechanism, the quality assurance system, the quality control program, and the vehicle testing element of the program. Test data including specific vehicle and station identification is to be collected to allow the linking of specific test results to a specific vehicle, test site and inspector, and to assess whether correct test procedures were followed. Summaries of this data must be submitted to EPA annually. A biennial report detailing any changes made to the program over the two year period as well as any weaknesses discovered and the improvements made or corrective actions taken, including the results of those actions, and any future actions planned, must be submitted. Initial submission of the required annual reports must be within 18 months of implementation of the program, and the biennial report must be submitted within 30 months of the initial implementation of the program.

Inspector Training and Licensing or Certification

All inspectors are to be trained and licensed or certified in order to perform inspections. The state is responsible for administering or overseeing inspector training; employers may not be responsible for the certification or licensing of their own employees. The curriculum is to cover the causes and effects of air pollution; the purpose, rules, procedures, and technical details of the test program; emission control device function, configuration, and inspection; equipment calibration, operation, and maintenance; public relations; and safety and health issues related to the inspection process. Inspectors must pass a written test covering this information, and a hands-on test demonstrating the ability to properly conduct an inspection without assistance. Licenses and certifications can only be valid for up to two years, at which point refresher training and retesting is required. Alternative approaches based on more comprehensive skill examination and determination of inspector competency may be used.

Public Information and Consumer Protection

Public information and consumer protection plans are required. Measures must include a mechanism whereby vehicle owners can challenge the results of an inspection. In addition, states are to inform the public of the air quality problem, the role of motor vehicles in the air quality problem, the need for and benefits of an inspection program, and how to maintain a vehicle in a low-emission condition. In enhanced areas, motorists that fail the

test should be given assistance in finding a qualified mechanic and should be provided with software generated interpretive diagnostic information. Other required measures include protection of whistle blowers, processes for following up on complaints, and assistance for owners in obtaining warranty covered repairs for eligible vehicles.

Improving Repair Effectiveness

The state is to insure that adequate training for mechanics performing emission control repairs exists. In addition, the regulation requires the oversight agency to assist the repair industry with information related to vehicle diagnosis and repair, and with technical and legal questions that may arise. In enhanced areas, performance monitoring of the repair service facilities is required, so that motorists who fail the test are provided with information as to the success of individual service facilities in repairing vehicles to pass. This information is to be provided to the public as well as to service providers.

Compliance with Recall Notices

The state must be able to determine a recalled vehicle's compliance status, with owners or leasees of vehicles designated as unresolved requiring proof of recall compliance before being allowed to complete the registration or inspection process. The state shall report recall compliance statistics to EPA annually. The recall compliance requirements apply only to enhanced areas and go into effect for recalls with owner notification after January 1, 1995.

On-road Testing

The Act requires on-road testing in enhanced I/M areas. The regulation specifies that at least 0.5% or 20,000 vehicles, whichever is less, of the subject fleet shall be on-road tested, either through the use of remote sensing devices or through road-side pullovers. Owners of high emitting vehicles that have previously passed a normal periodic test or retest are to be notified that the vehicles are required to pass an out-of-cycle follow-up inspection. Emission credit for on-road testing will be granted to the extent the on-road testing lowers the fleetwide emission level below what is achieved by other elements of the I/M program. The SIP must include technical support for the claimed additional emission reductions.

State Implementation Plan Submissions

By November 15, 1992, states are to submit a SIP revision which includes a formal commitment from the Governor to implement an I/M program meeting the requirements of the regulation and a schedule describing milestones leading to full implementation of mandatory testing. By November 15, 1993, states are to submit complete SIPs including the necessary legal authority, final regulations, a description of each of the program elements required to be

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\$3,000-30,000/ton

Note: Cost estimate ranges were based on values published by government agencies, environmental groups, and industry.

Cost estimates for transportation controls do not reflect benefits from reduced congestion, fewer accidents, etc.

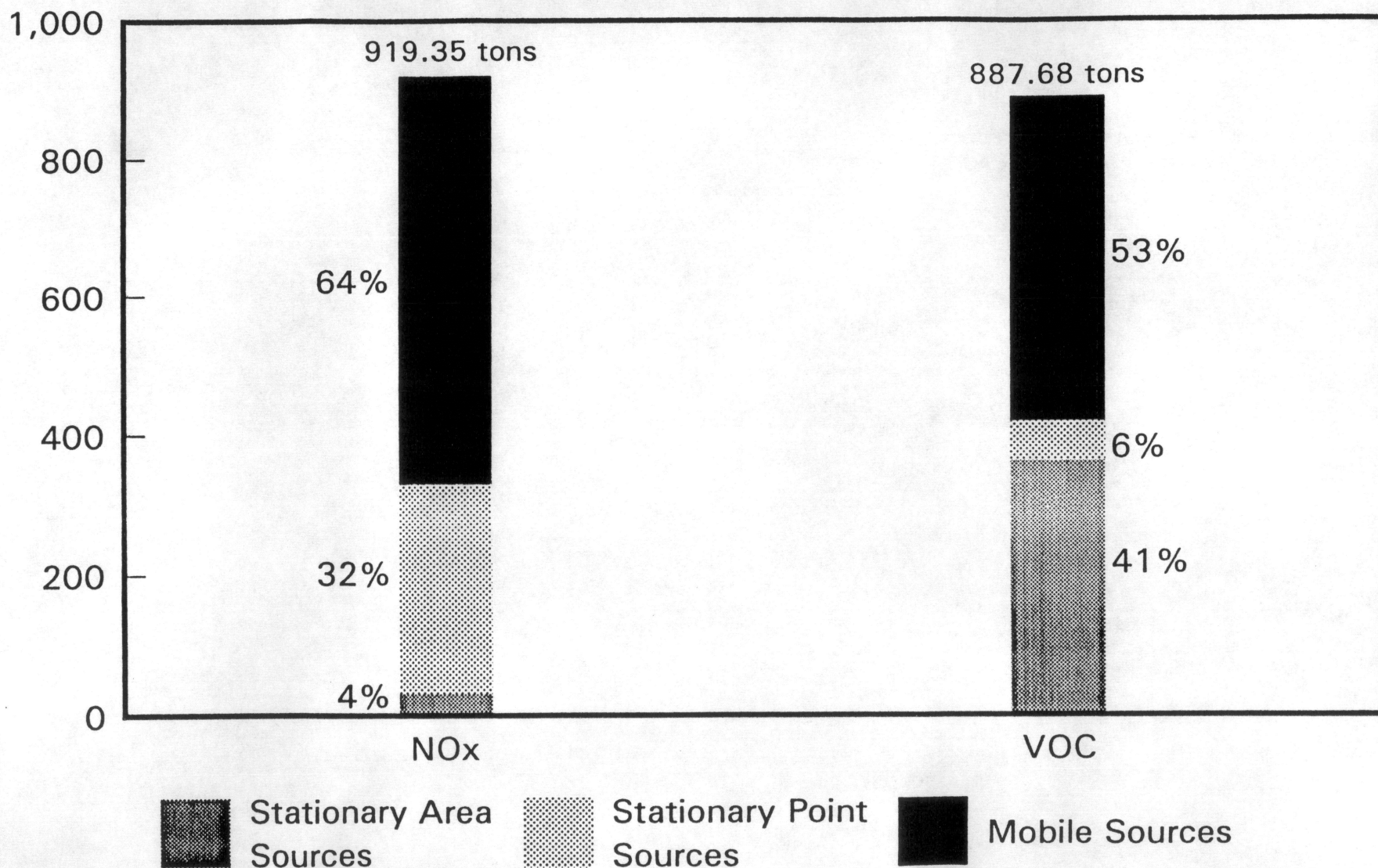
COST TO CONSUMER

- **Enhanced I/M:**
 - **\$15-20 every two years**
 - **Almost all repairs needed under \$100/car**
- **Other options:**
 - **5-40% increase in electric rates**
 - **20-40% increase in gasoline prices**
 - **\$500-3,000/new car**
 - **Higher taxes to pay for additional mass transit**
 - **Increased costs in all products from small businesses**
 - **Significant behavioral changes:**
 - **Parking bans and high fees**
 - **Limitations on car use**
 - **Fuel switching for heating**
 - **Unavailability of products**

Note: Cost estimate ranges were based on values published by government agencies, environmental groups, and industry.

1990 MASSACHUSETTS NO_x & VOC EMISSIONS

Tons per summer day



Based on 1990 state draft inventory of June 1993

Summary of Final Inspection/Maintenance Rule

Preface

This summary is provided to allow the reader a quick, easy to read review of EPA's Inspection/Maintenance rule. It should not, however, be used as the basis for designing a program.

Background

The control of in-use motor vehicle emissions is crucial to the attainment of clean air. While motor vehicle manufacturers have made tremendous advances in emission control technology, cars and trucks still account for about half of the ozone air pollution and nearly all of the carbon monoxide (CO) air pollution in United States cities, with 10% to 30% of in-use vehicles causing the bulk of the problem. Inspection and Maintenance (I/M) programs reduce mobile source emissions by identifying in-use vehicles in need of engine or emission control repairs.

The Environmental Protection Agency (EPA) has had oversight and policy development responsibility for I/M programs since the passage of the Clean Air Act in 1970, which included I/M as an option for improving air quality. With the passage of the 1977 amendments to the Clean Air Act, I/M was mandated for certain areas with long term air quality problems, while the 1990 amendments to the Clean Air Act (the Act) expand I/M's role as an attainment strategy and require EPA to develop different performance standards for "basic" and "enhanced" I/M programs. The performance standard is the minimum amount of emission reductions a program must achieve, based on a model or benchmark program design. In addition, the Act directs EPA to address requirements for specific design elements and program implementation issues for both basic and enhanced programs. The provisions of the regulation addressing these requirements are summarized below.

Applicability

The Act contains assorted requirements for ozone transport regions (OTR) and specifically establishes one such region in the Northeastern United States, covering Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, and the Consolidated Metropolitan Statistical Area (CMSA) that includes the District of Columbia. Within an OTR, enhanced I/M is required in any metropolitan statistical area (MSA) with a 1990 population of 100,000 or more, regardless of a given area's attainment classification. In the case of a multi-state MSA, enhanced I/M is required in all OTR portions if the sum of these portions equals a population of 100,000 or more, irrespective of the population of the individual OTR state portion.

Outside of an OTR, any area having a 1980 Census-defined urbanized area population of 200,000 or more that has been designated serious or worse ozone nonattainment or moderate to serious CO nonattainment (with a design value greater than 12.7 ppm) must implement enhanced I/M in the 1990 Census-defined urbanized area (at a minimum). Basic I/M must be implemented in 1990 Census-defined urbanized areas with populations of less than 200,000 that have been designated as serious or worse ozone nonattainment or as CO nonattainment with a design value greater than 12.7 ppm. All areas designated as marginal ozone nonattainment or moderate CO nonattainment must continue operating programs that were part of an approved SIP as of November 15, 1990 and, where necessary, must upgrade such programs to meet the requirements of a basic I/M program. In addition, any moderate ozone area must implement a basic I/M program in the 1990 Census-defined urbanized area.

Program coverage is to be MSA-wide and county-wide in subject MSA's in an OTR, except that some rural counties with population densities of less than 200 persons per square mile (as defined by the 1990 Census) can be excluded, as long as at least 50% of the MSA is covered. Outside of an OTR, programs must nominally cover the entire 1990 Census-defined urbanized area. Exclusion of some urban population is allowed as long as an equal number of non-urban residents within the subject MSA are included to compensate for the exclusion. Expansion of the program beyond the required population can no longer be used to demonstrate compliance with the performance standard, but could be used for offsets or could be applied to the reasonable further progress (RFP) requirements of the Act.

Performance Standard

The performance standard allows states flexibility in designing I/M programs as long as such programs result in the same or lower emission targets from mobile sources as that achieved by the relevant model program. SIP demonstrations are to be made with the most current MOBILE model or an alternative approved by the Administrator. Areas shall meet the performance standard for the pollutants which cause them to be subject to I/M. For enhanced I/M areas in nonattainment for ozone, the performance standard must be met for both NOx and VOCs. Basic ozone nonattainment areas must meet the VOC performance standard and prevent NOx increases. If the Administrator finds that NOx emission reductions are not beneficial in a given ozone nonattainment area, then NOx emission targets will not be required to be met by the I/M program for that area.

The basic I/M performance standard is based upon the original New Jersey program and remains essentially unchanged from prior to enactment as a result of EPA's new regulation. The model program includes annual, centralized idle tailpipe testing of model year 1968 and later light duty vehicles (LDV). The standard does not

include testing of heavy duty vehicles or inspection of emission control devices. It also assumes no waivers and full compliance. Programs must be designed such that NOx emission increases, overall, do not occur.

The enhanced model program is based on annual, centralized testing of all model year 1968 and later LDVs and light duty trucks (LDT). Steady-state testing is performed on 1968 through 1985 model year vehicles, while 1986 and later model year vehicles are subject to transient tailpipe emission testing (IM240) and transient evaporative system purge testing. 1983 and later model year vehicles also receive evaporative system pressure tests, while 1984 and later model year vehicles are visually inspected for the presence and proper connection of the catalyst and fuel inlet restrictor. The steady-state cutpoints for 1981 - 1985 model year light duty vehicles are 1.2% CO, 220 ppm HC, and 6% CO+CO₂. The applicable grams-per-mile emission standards for transient-tested vehicles are as follows:

1986-93 LDVs	HC: 0.8	CO: 15.0	NOx: 2.0
1986-93 LDT1 (<6K lbs.)	HC: 1.2	CO: 20.0	NOx: 3.5
1986-93 LDT2 (>6K lbs)	HC: 1.2	CO: 20.0	NOx: 3.5
Tier 1 1994+ LDVs	NMHC: 0.7	CO: 15.0	NOx: 1.4
Tier 1 1994+ LDT1	NMHC: 0.7	CO: 15.0	NOx: 2.0
Tier 1 1994+ LDT2	NMHC: 0.8	CO: 15.0	NOx: 2.5

The enhanced I/M standard includes on-road testing of at least 0.5% of the subject vehicle population, or 20,000 vehicles, whichever is less. The Act also requires testing of a vehicle's onboard diagnostic (OBD) systems for both basic and enhanced programs. EPA will revise relevant sections of its I/M regulation once OBD regulations have been finalized.

Network Type

Enhanced programs must implement a centralized, test-only network unless the state can demonstrate that a decentralized program would be equally effective in achieving the performance standard, based on past performance. The demonstration would have to include, at a minimum, surveys to assess the effectiveness of repairs, rates of tampering, and effectiveness of inspectors at identifying vehicles in need of repair. EPA is not aware of any program that could make this demonstration. A network consisting of testing facilities in which owners and employees only perform official I/M testing (which may include safety-related inspections) and are contractually or legally barred from engaging in motor vehicle repair or service will be considered equally effective to a centralized program. Network design can be test-only or test-and-repair in basic areas, as long as the performance standard is met.

MOBILE model credits for test-and-repair networks are assumed to be 50% less than for a test-only network for the tailpipe emission test, purge test, evaporative system pressure test, catalyst, and gas cap checks; and 75% less for the evaporative canister checks, PCV checks, and air system check. Basic and enhanced I/M areas can receive more prospective SIP credit if the state can demonstrate that past performance supports such additional credit, as described above. Hybrid programs will be modeled based upon the percentage of the fleet tested in test-only versus test-and-repair type facilities.

All I/M programs are required to submit biennial program evaluations to quantify the emission reduction benefits of the program. In enhanced areas, a random, representative sample of at least 0.1% of the subject vehicles shall receive a state-administered or monitored IM240 as part of this evaluation.

Adequate Tools and Resources

A portion of the test fee or a separately assessed per vehicle fee must be placed in a dedicated fund and retained on an annual basis to finance program oversight, management, personnel, and capital expenditures. Alternatives to this approach are acceptable provided the state can demonstrate that adequate funding can be maintained in some other fashion besides reliance on future uncommitted annual or biennial appropriations from the state or local general fund. The SIP must include a detailed program budget, including personnel allocations.

Test Frequency and Vehicle Coverage

Both I/M performance standards include annual testing (as required by the Act) of 1968 and later LDVs, while only the enhanced I/M standard includes LDTs to 8,500 pounds GVWR. Subject vehicles are comprised of vehicles registered or required to be registered and fleets primarily operated within the I/M program area, including leased vehicles and those operated on Federal installations located in the I/M area. Vehicles registered in the program area but primarily operated in another I/M area are to be tested in one or the other of the I/M areas. Alternative vehicle testing schedules and coverage options can be approved, provided the required emission reductions are achieved. EPA encourages biennial testing as a cost effective alternative to annual testing.

Test Procedures and Standards

Valid I/M test procedures include idle, two-speed, steady-state loaded, and transient tailpipe emission testing (IM240), visual emission control device inspections, and purge and pressure testing of the evaporative system. Alternative test procedures may be approved if they can be shown to be equivalent or better in minimizing false failures, correlating to the Federal Test Procedure, and lead to fleetwide emission levels equal to or lower than those achieved by the applicable performance standard. All I/M programs regardless of the tests used are required to implement procedures to ensure accurate testing, allow owner observation of the tests, ensure completion of official tests, provide for use of proper equipment and its calibration, prevent the testing of vehicles in unsafe condition or with missing or leaking exhaust systems, and ensure proper retesting of failed vehicles.

HC, CO, and CO+CO₂ pass/fail standards are to apply to all vehicles and repairs are required for failure of any standard, regardless of the attainment status of the area. NOx pass/fail standards are to apply to vehicles subject to a transient test in ozone nonattainment areas or in an OTR, unless a waiver of NOx control requirements is approved by the Administrator. Pass/fail standards for the visual inspection, pressure and purge tests are given.

Test Equipment

Equipment is to be tested and certified by the program before it is used. The equipment must be able to test all subject vehicles, be adaptable to new technology vehicles, and be automated to the highest degree possible to prevent tampering and abuse and to ensure test integrity. The system must generate a test record for the vehicle owner that includes unique vehicle information, the applicable standards, the results of the tests conducted, warranty information, certification that the tests were conducted in compliance with program requirements, and information concerning possible causes of the specific pattern of high emissions (if any) found during the test. The pass/fail decisions for all measurements must be automatic. The data is to be recorded to an electronic medium, and the system is to regularly perform self checks for recording and calibration accuracy and system integrity. Automatic lockouts should occur if the system is tampered with or if quality control checks are not performed or are failed. Test systems in enhanced areas must include a real-time data link to a host computer to ensure test accuracy and prevent unauthorized multiple initial tests. All manual data entry must be verified.

Quality Control

The regulation includes minimum quality control (QC) requirements to be met by all I/M programs, as well as specific requirements for enhanced I/M programs. The measures addressed include periodic test equipment checks, calibration and maintenance requirements, accuracy specifications, QC recordkeeping requirements, frequency

requirements for QC checks, process automation requirements, and document security requirements. Calibration gas specifications are also detailed. Alternatives or exceptions to the procedures or frequencies may be approved by the Administrator based on a demonstration, including control chart analysis, of equivalent performance.

Waivers

Programs may issue waivers to allow motorists to complete the I/M program requirements without meeting the applicable test standards, provided minimum requirements are met including a minimum expenditure for relevant repairs. The cost of repairs covered by warranty, tampering-related repairs and repairs not performed by a repair technician cannot be assessed toward meeting the minimum expenditure, except that repairs for pre-1980 model year vehicles can be made by non-technicians. A visual check is required to determine that repairs were actually made on vehicles for which waivers are sought. For basic I/M programs, the minimum expenditure is \$75 for pre-81 vehicles and \$200 for 1981 and later vehicles; for enhanced I/M programs, the minimum expenditure is \$450, adjusted annually based upon the Consumer Price Index. One-time-only time extensions not exceeding one inspection cycle may be granted in the case of economic hardship, but must be tracked and reported by the program. Waivers can be issued for less than \$450 if a program is established to scrap vehicles that do not meet standards after the lower expenditure is made.

Programs are required to quality control waiver issuance. In enhanced programs, waivers may only be issued by the state agency (or its contractor), i.e., inspectors cannot issue waivers. In basic programs, inspectors in stations and lanes may issue waivers, provided comprehensive quality assurance procedures are in place to minimize abuse of the waiver system. All programs must inform vehicle owners of potential warranty coverage, insure that repair receipts cannot be revised or reused, insure that waivers are only valid for one test cycle, and track, manage and account for time extensions or exemptions to prevent the improper issuance or use of waivers. The SIP must include a maximum waiver rate to be used in the MOBILE analysis to estimate the emission reductions from the program, with corrective action or SIP revision required if the waiver rate exceeds the rate modelled.

Motorist Compliance Enforcement

I/M programs must be enforced through registration denial unless an existing alternative is proven more effective (in the case of enhanced programs) or as effective (in the case of basic programs); no alternative to registration denial is allowed in newly implementing I/M programs subject to enhanced requirements. Existing sticker-based and computer-matching enforcement programs are the alternative enforcement mechanisms which may be able to meet the Act's requirements.

"Registration denial" means a subject vehicle cannot be registered in an I/M area without first establishing proof of compliance with all applicable I/M program requirements. Pursuant to §207(g)(3) of the Act, the regulation does not require new vehicles to receive emission testing prior to initial retail sale. Minimum requirements for a registration-based enforcement program include: easy visual confirmation of a vehicle's compliance status; a dated compliance certificate which is linked to a specific operator and vehicle; routine citations for operating a vehicle with expired or missing license plates or tags and/or no or expired registration; provision for enforcement by officials other than police (e.g., parking meter attendants) and the citing of parked vehicles; validation of registration changes that would change a vehicle's status from subject to exempt; strict limits on and accounting of exemptions from the testing/registration requirements; and, insurance that vehicle registrations are changed upon moving into an I/M area.

A state considering an alternative enforcement mechanism must demonstrate its equal or superior effectiveness of past performance by comparing the percentage of I/M subject vehicles actually in compliance to the percentage of vehicles complying with the registration requirement. Additionally, sticker-enforced programs must assess the extent to which using stolen, counterfeit, safety only, or expired stickers is a problem. Also, the sticker or identifier used must be clearly visible, unambiguously indicate compliance status, be difficult to counterfeit or steal, and its absence from subject vehicles must result in significant, monetary fines. States pursuing sticker enforcement must also conduct annual, random samples of at least 10% or 10,000 vehicles (whichever is less) as a backup assessment of the compliance rate.

States pursuing computer-matching enforcement must demonstrate that at least 90% of the subject fleet is in compliance within 4 months of the compliance deadline, with significant monetary penalties for non-compliance beyond 4 months, and prevention of vehicle operation for continued noncompliance. All initial notices, warnings, notices of violation and penalty notices must be tracked and reported monthly. The number and percentage of vehicles that never comply (as a result of being junked or moved from the I/M area) must be assessed.

Motorist Compliance Enforcement Program Oversight

Oversight of the motorist compliance enforcement program is required, including quality assurance, quality control, and information management activities. These activities include verification and tracking of vehicle exemptions through physical examination, facilitation of accurate test data, maintenance of an audit trail for all enforcement activities, establishment of written procedures for enforcement personnel (including registration personnel), procedures for disciplining, retraining, or replacing personnel not following established procedures, and prevention of the fraudulent use of inspection documents. Programs

are to evaluate motorist compliance program effectiveness, which requires periodic auditing of test and compliance records, determination of the subject vehicle population, comparison of the testing data base and the registration data base to determine compliance, comparison of these data bases to "red flag" potential non-compliance, and sampling of the in-use fleet.

Quality Assurance

All I/M programs must be quality assured by performing regular audits - both overt and covert. At least two overt audits per test lane must be conducted per year including equipment audits, checks of document security, record keeping, licensing and display information, and evaluation of the inspector's ability to properly perform an inspection. Screening or review of inspector and station records is required at least monthly to identify problems that may indicate potential fraud or incompetence, indicating the need for additional audits. The review is to include computerized analysis, with on-site review of non-covered records, to identify statistical inconsistencies, unusual patterns, and other discrepancies, and should provide for comprehensive accounting of forms that can be used to demonstrate compliance.

Covert audits using vehicles set to fail are required at least once per year per the number of inspectors. In test-and-repair networks, covert audits are to be conducted at least once per station per year, and are to include the purchase of repairs and retesting if the vehicle is properly failed. The program must use a sufficient number of covert vehicles and auditors to avoid detection; the vehicles should cover the range of vehicle technology groups (e.g., carbureted and fuel-injected). Auditors must be trained in program basics including the use of analyzers, air pollution control basics, emissions-related engine repair, emission control systems, evidence gathering, administrative procedures law, and quality assurance practices. The auditors themselves are to be audited at least once annually.

Enforcement Against Contractors, Stations, and Inspectors

The regulation requires programs to develop and submit as part of the SIP penalty schedules setting minimum penalties for violations of program requirements. In the case of contracted systems, the state may use compensation retainage in lieu of penalties. Inspectors who intentionally pass a failing vehicle will have their licenses suspended for a minimum of six months. Adequate legal authority to effectively enforce the penalty schedule is required. Quality assurance personnel must have the authority to immediately, temporarily suspend station or inspector licenses for violations (with supervisory approval). A hearing must be held within 14 days of a written request from the station or inspector, or the temporary suspension will automatically lapse. If a state's constitution precludes such authority to immediately suspend, the program must demonstrate adequate resources and mechanisms to process violations within three business days. The SIP is to

describe the administrative and judicial procedures and responsibilities relevant to the enforcement process.

Data Collection, Analysis and Reporting

Accurate data collection is essential to the management, evaluation, enforcement, and oversight of a state's program and provides vital information to both the program management and EPA. The regulation therefore requires data analysis and reporting, including summary statistics and effectiveness evaluations of the enforcement mechanism, the quality assurance system, the quality control program, and the vehicle testing element of the program. Test data including specific vehicle and station identification is to be collected to allow the linking of specific test results to a specific vehicle, test site and inspector, and to assess whether correct test procedures were followed. Summaries of this data must be submitted to EPA annually. A biennial report detailing any changes made to the program over the two year period as well as any weaknesses discovered and the improvements made or corrective actions taken, including the results of those actions, and any future actions planned, must be submitted. Initial submission of the required annual reports must be within 18 months of implementation of the program, and the biennial report must be submitted within 30 months of the initial implementation of the program.

Inspector Training and Licensing or Certification

All inspectors are to be trained and licensed or certified in order to perform inspections. The state is responsible for administering or overseeing inspector training; employers may not be responsible for the certification or licensing of their own employees. The curriculum is to cover the causes and effects of air pollution; the purpose, rules, procedures, and technical details of the test program; emission control device function, configuration, and inspection; equipment calibration, operation, and maintenance; public relations; and safety and health issues related to the inspection process. Inspectors must pass a written test covering this information, and a hands-on test demonstrating the ability to properly conduct an inspection without assistance. Licenses and certifications can only be valid for up to two years, at which point refresher training and retesting is required. Alternative approaches based on more comprehensive skill examination and determination of inspector competency may be used.

Public Information and Consumer Protection

Public information and consumer protection plans are required. Measures must include a mechanism whereby vehicle owners can challenge the results of an inspection. In addition, states are to inform the public of the air quality problem, the role of motor vehicles in the air quality problem, the need for and benefits of an inspection program, and how to maintain a vehicle in a low-emission condition. In enhanced areas, motorists that fail the

test should be given assistance in finding a qualified mechanic and should be provided with software generated interpretive diagnostic information. Other required measures include protection of whistle blowers, processes for following up on complaints, and assistance for owners in obtaining warranty covered repairs for eligible vehicles.

Improving Repair Effectiveness

The state is to insure that adequate training for mechanics performing emission control repairs exists. In addition, the regulation requires the oversight agency to assist the repair industry with information related to vehicle diagnosis and repair, and with technical and legal questions that may arise. In enhanced areas, performance monitoring of the repair service facilities is required, so that motorists who fail the test are provided with information as to the success of individual service facilities in repairing vehicles to pass. This information is to be provided to the public as well as to service providers.

Compliance with Recall Notices

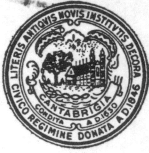
The state must be able to determine a recalled vehicle's compliance status, with owners or leasees of vehicles designated as unresolved requiring proof of recall compliance before being allowed to complete the registration or inspection process. The state shall report recall compliance statistics to EPA annually. The recall compliance requirements apply only to enhanced areas and go into effect for recalls with owner notification after January 1, 1995.

On-road Testing

The Act requires on-road testing in enhanced I/M areas. The regulation specifies that at least 0.5% or 20,000 vehicles, whichever is less, of the subject fleet shall be on-road tested, either through the use of remote sensing devices or through road-side pullovers. Owners of high emitting vehicles that have previously passed a normal periodic test or retest are to be notified that the vehicles are required to pass an out-of-cycle follow-up inspection. Emission credit for on-road testing will be granted to the extent the on-road testing lowers the fleetwide emission level below what is achieved by other elements of the I/M program. The SIP must include technical support for the claimed additional emission reductions.

State Implementation Plan Submissions

By November 15, 1992, states are to submit a SIP revision which includes a formal commitment from the Governor to implement an I/M program meeting the requirements of the regulation and a schedule describing milestones leading to full implementation of mandatory testing. By November 15, 1993, states are to submit complete SIPs including the necessary legal authority, final regulations, a description of each of the program elements required to be



City of Cambridge

24.

IN CITY COUNCIL

September 27, 1993

COUNCILLOR WOLF

WHEREAS: The City of Cambridge is taking an active part in compliance with the Clean Air Act of 1990 by implementing an ordinance that involves transportation control measures; and

WHEREAS: In adopting these ordinances, the City, the business community, and environmentalists have struggled to develop an approach that balances quality of life and environmental concerns with concerns of economic development and development of the city's tax base; and

WHEREAS: The whole State, including other cities and towns, will struggle with these issues also, and citizens will have to respond to these challenges; and

WHEREAS: There is before the State Legislature a bill (H5395) to support the development of an Enhanced Inspection and Maintenance program (Enhanced I/M) for automobiles that will be heard by Committee on September 29; and

WHEREAS: Such an Enhanced I/M program is required under the Clean Air Act and, further, would result in as much as 50% of the reduction in air pollution in Massachusetts as is required under the Act, as the attached documents state; and

WHEREAS: If such as a program is not adopted, there will be a variety of negative results for the State; and

WHEREAS: The City of Cambridge and other municipalities, as well as a variety of businesses, will have to compensate for this inaction by taking stringent action in their domain; now therefore be it

RESOLVED: That the Cambridge City Council endorses the concept of an Enhanced Inspection and Maintenance program to meet the requirements of the Clean Air Act of 1990; and be it further

RESOLVED: That the Cambridge City Council encourages the Legislature to pass legislation that will implement Enhanced I/M.

City, General
Non-Consent Order # 24

R-433

Councillor Wolf resolution endorsing
the Enhanced Inspection and Maintenance
Program.

In City Council,
Sept. 27, 1993

Order adopted