



# COALITION FOR SAFER, CLEANER VEHICLES

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**STATEMENT OF  
THE COALITION FOR SAFER, CLEANER VEHICLES**

**Before the  
PENNSYLVANIA HOUSE OF REPRESENTATIVES  
TRANSPORTATION COMMITTEE  
SUBCOMMITTEE ON TRANSPORTATION SAFETY**

**HARRISBURG, PA  
February 25, 1992**

## INTRODUCTION

Mr. Chairman and Members of the committee, we appreciate the opportunity to present testimony regarding the state of Pennsylvania's plans to strengthen its vehicle emissions inspection (I&M) program.

I am Gary Huggins, Executive Vice President of the Coalition for Safer, Cleaner Vehicles (CSCV). CSCV is a national non-profit consumer, environmental and industry organization committed to assisting states in adopting and improving vehicle emissions and safety inspection programs. We also provide public education on the benefits of vehicle inspection.

The Coalition's membership includes consumer groups--representing over 50 million people, state vehicle and pollution control administrators, automotive associations, individual companies and others. A membership list will be included with our testimony for the record.

The Coalition supports the adoption of the most effective inspection programs available to achieve the goals of cleaner air and safer highways. CSCV has not formally taken a position favoring either decentralized or centralized inspection programs. In our testimony we will present the facts and details of the 1990 Clean Air Act Amendments, EPA research and the results of our survey on experience with vehicle emissions inspection programs.

## BACKGROUND

Planning for enhanced emissions inspection programs should focus on effectiveness, cost and building public support for the programs. Ineffective emissions inspection programs will not survive in the marketplace. The public, having invested both personal time and fees for inspections, will not continue to accept any failure to achieve significant improvements in air quality.

The 1990 Clean Air Act Amendments direct the U.S. Environmental Protection Agency (EPA) to establish a minimum performance standard for I&M based on the performance achievable by annual inspections in a centralized testing operation. States will be required to show that their I&M program is equal in effectiveness to the performance standard. It should be noted that EPA has not yet defined what "equal" means. Congress has clearly indicated that quality is non-negotiable regarding vehicle inspection programs

required in the 1990 Clean Air Act Amendments.

According to the U.S. EPA, vehicle emissions are responsible for up to 70% of the volatile organic compounds (VOC's) which pollute our air. The U.S. EPA has also found that the most cost-effective pollution control strategy available is a high-technology vehicle emissions inspection program. They estimate that high-tech I&M programs will cut vehicle emissions by 30%, at a cost of about \$10 per vehicle per year and a total cost of \$500 per ton of pollutants eliminated.

Federal Clean Air Act requirements in the absence of a strong I&M program include very costly additional controls on small business and industry which will cost over \$5,000 per ton. This will have a negative effect on employment, competitiveness and growth.

The potential 30% reduction in vehicle emissions from a high-tech I&M program will help achieve about 10 percentage points toward the Clean Air Act's requirement that polluted areas achieve a 24% overall emissions reduction by the year 2000. If attainment targets are not met, growth will be curtailed and jobs will be lost. Additionally, fees and limitations on vehicle use will likely be necessary.

To put this in perspective, according to the U.S. EPA, high-tech I&M alone in most areas can achieve larger emissions reductions than the complete elimination of all emissions from entire categories of area sources such as bakeries, tire manufacturers, printers, plastic manufacturers, inorganic manufacturers, bulk gasoline terminals, dry cleaners, polyethylene manufacturers, and rubber manufacturers combined. It can do so at a cost of \$500 per ton as compared to \$5,000 per ton for additional controls on stationary sources.

Additionally, the increased vehicle emissions reduction achieved through a high-tech I&M program will minimize the need to implement more onerous transportation control/reduction strategies such as restricting car usage, tolls on heavily traveled roads and a parking tax in metropolitan areas.

#### SURVEY OF PUBLIC ATTITUDES

In September of 1991, Riter Research of Annapolis, MD conducted a random survey of 1008 adults on Attitudes and Opinions Regarding Vehicle Emissions Testing for the Coalition which found that the public was also supportive of improved emissions inspection programs. The survey was conducted in the following five states: California, New York, Texas, Maryland and Wisconsin. CA, NY and TX have decentralized emissions inspection programs and MD and WI have centralized inspection programs.

The purpose of the survey was to determine:

- Support for programs to reduce air pollution from vehicles in areas that do not meet federal Clean Air Act requirements
- Experience with current vehicle emissions testing programs
- Attitudes about different types of vehicle emissions testing programs
- Support for inspection of vehicle's critical safety items

## RESULTS

### Public Support for Emissions Inspection Programs

72% of those surveyed favored establishing more effective vehicle emissions testing in order to achieve cleaner air.

While only 37% support mandatory car pooling in metropolitan areas, 26% support tolls on heavily traveled roads during commuter hours and only 12% supported restrictions on vehicle usage.

### Price Sensitivity

The survey demonstrated that the public is price sensitive regarding what is considered a reasonable fee for a vehicle emissions inspection program.

Overall 74% of those surveyed about a \$10 fee felt the fee was reasonable. When another matched sample was asked about a \$30 fee only 44% felt the fee was reasonable. A third matched sample was asked about a \$50 fee, only 30% felt the fee was reasonable.

### Waiting Time/Convenience

Most motorists, whether from states with decentralized or centralized testing programs perceived stations/testing centers locations to be convenient 90%.

The survey found that motorists from states with decentralized testing programs are more apt to be inconvenienced when attempting to have their vehicles inspected than motorists from states with centralized testing programs. Specifically:

- The average wait time to get a vehicle inspected in states with centralized programs is 22 minutes vs. 1 and 1/2 hours in decentralized programs.
- Motorists from states with decentralized testing programs are three times more likely to be asked to come back another time for inspection (27% vs. 10%).

- Nearly one out of every three motorists from states with decentralized programs had to leave their car for inspection. The average time the vehicle had to be left for inspection was five hours.
- Motorists from states with decentralized programs were seven times more likely to have to take their vehicle to another station to get their vehicle inspected than motorists from centralized states (20% vs. 3%).
- Motorists from decentralized states who failed the emissions test are just as likely to take their vehicle to another station or garage for repairs as to have it repaired at the facility where tested. 47% had repairs done at the facility where tested while 53% went to another station or garage for repairs. This seems to indicate that motorists do not expect to fail their emissions test and typically do not allow enough time for repairs, or they prefer to go to a different place for required repairs than for the initial test. The end result is that often the public themselves elects to make multiple trips--the so called ping pong effect--to complete inspection and repair functions.

#### Separation of Testing and Repairs

The Survey showed that 71% of motorists, regardless of whether they are from a centralized or decentralized state, favor the separation of testing and repairs.

77% of those surveyed felt that their interests are best protected by the separation of the emissions testing from any repairs that might be necessary.

#### Testing of Safety Critical Items

The survey showed that 77% of the public favors inspection of the vehicle's safety-critical items at least once a year. 66% of the public favors testing of safety-critical items on vehicles while conducting the emissions test, provided the added fee is \$5 or less.

A copy of the complete survey will be included with our testimony for the record.

#### IMPORTANCE OF TRAINING AND PROPER MAINTENANCE

When Pennsylvania adopts the enhanced emissions inspection programs required in the 1990 Clean Air Act Amendments, it is important to plan for the tremendous increase in demand for repair or replacement of sophisticated systems and equipment.

In order to assure the success of enhanced I&M programs, there is

no doubt that more emphasis has to be placed on maintenance--the M side of I&M in the future. Not one ounce, not one gram of pollution is eliminated by inspection alone. To achieve the desired goals, vehicle repairs must be made properly and effectively for the benefit of air quality and consumer protection.

The use of high-tech inspection and diagnostic procedures will help the repair industry perform more cost-effective repairs because of two factors: 1) better diagnostic information outlining the likely causes of failures and needed repairs will assist the repair industry immediately 2) the I/M 240 test procedure will more effectively identify the super and high emitting vehicles and can better distinguish between marginally emitting vehicles which should pass and those that should fail. The repair industry has demonstrated significantly better capabilities to more cost-effectively repair the super and high emitting vehicles, while having difficulty in diagnosing and repairing the marginally emitting vehicles.

Mechanics training programs are needed today to improve the repair industry's ability to perform cost-effective repairs. Improved training programs will be increasingly needed in the future when even more sophisticated vehicle technology appears and as we turn our attention to marginally emitting vehicles to increase the total emissions reductions obtained from I&M programs.

#### SUMMARY

The benefits of adopting the strongest available I&M program are enormous. The EPA estimates that a high-tech I&M program--centralized or decentralized--has the potential to reduce vehicle emissions by 30%. This would achieve approximately 10 percentage points toward the total 24% emissions reductions required by the year 2000.

High-tech I&M is also the most cost-effective clean air strategy available. At \$500 per ton high-tech I&M is seven times more cost-effective than tighter new car tailpipe standards and at least ten times more cost effective than additional controls on stationary sources.

Newer high-tech vehicles, coupled with the existence of known levels of unskilled technicians continues to widen the gap and threatens I&M program effectiveness. Sources and types of training materials, quick access to needed vehicle diagnostic information--yet to be implemented via section 207 (5) of the Clean Air Act--and on-going and continuous training are essential for the success of enhanced vehicle emissions inspection programs. We recommend that the state of Pennsylvania undertake an immediate and comprehensive training program in partnership with industry to begin to meet this urgent need.