



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway
Suite 120
Atlanta, Georgia 30354
404-363-7000

October 6, 2016

MEMORANDUM

To: Richard E. Dunn, Director
Environmental Protection Division

From: Karen Hays, Chief
Air Protection Branch

Subject: Responses to Comments Received During the Public Comment Period Regarding Proposed Revisions to Rules for Enhanced Inspection and Maintenance, Chapter 391-3-20

On September 1, 2016, EPD issued a public notice requesting comments on the proposed revisions to the Georgia Rules for Enhanced Inspection and Maintenance, Chapter 391-3-20. The proposed changes included the following rules:

- **Rule 391-3-20-.01, "Definitions,"** is being amended to update the definitions by revision, deletion or addition as necessary.
- **Rule 391-3-20-.04, "Emission Inspection Procedures,"** is being amended to modify this section to use standard terminology, remove obsolete language, and add new terminology due to advances in the emission testing industry.
- **Rule 391-3-20-.05, "Emission Standards,"** is being amended to modify this section to use standard terminology, remove obsolete language, and add new terminology due to advances in the emission testing industry.
- **Rule 391-3-20-.09, "Inspection Station Requirements,"** is being amended to provide clarification by using standard terms, adding clarifying language and removing unnecessary and obsolete language.

A public hearing was held at 2:30 p.m. on October 3, 2016, in the EPD Training Center located at 4244 International Parkway, Suite 116, Atlanta, Georgia 30354. A representative of the Industry Advisory Board presented oral comments during the public hearing, and also submitted them in writing. No other comments were received during the comment period that ended October 4, 2016. A summary of the comments received and EPD's responses are attached. No changes to the proposed amendments are recommended based on comments received.

KH:PTE
Comments

Responses to Comments Received on the Proposed Amendments to the Rules for Enhanced Inspection and Maintenance Chapter 391-3- 20

September 1, 2016 through October 4, 2016

On September 1, 2016, the Georgia Environmental Protection Division (EPD) issued a public notice requesting comments on Georgia's proposed amendments to the Rules for Enhanced Inspection and Maintenance, Chapter 391-3-20 pertaining to vehicle emissions and inspection. One comment was received from a representative of the Industry Advisory Board during the public hearing on October 3, 2016. These comments are summarized and followed by EPD's responses below.

Comment: The commenter agreed with the Proposed Rule by “expressing our support for the technology improvements being brought about through the implementation of Phase V. It's our belief that these measures will help to improve and sustain the emissions testing industry...,” while voicing concerns over the costs and profitability associated with implementing Phase V, including costs to upgrade older equipment, purchase new equipment, install internet connections, etc.

EPD Response: EPD agrees with the commenter that the Phase V upgrade will improve the inspection process and sustain the program into the future. This will be accomplished by using faster and more reliable internet connections, by giving EPD the ability to provide better assistance to motorists with failing inspections through more vehicle data collection, and by improving security measures for the testing community.

EPD acknowledges that while the installation of the Phase V upgrade will have varying costs for station owners, this is the first technology upgrade required in 8 years. Since Georgia's vehicle emissions program is a decentralized program, testing stations are individually owned and operated. By law, the test fee can range from \$10 up to \$25. The average cost per vehicle emission test conducted in 2015 was \$19.64. EPD does not determine the pricing of the inspections at individual stations; therefore, profitability in the I/M program is a function of costs versus income for individual station owners.