



2016 Annual Operations Report

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Data analysis and reporting are required for the monitoring and evaluation of Georgia's Enhanced I/M Program ("the Program") by program management and the US Environmental Protection Agency (EPA). This report includes information regarding the types of program activities performed and their final outcomes. Also included are summary statistics and effectiveness evaluations of the enforcement mechanism, the quality assurance system, the quality control program, and the testing element.

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Section I. Test Data Report

Test Data Report

The following report provides basic statistics on the testing program for the reporting year of January 1, 2016, through December 31, 2016. It includes:

- A. The number of vehicles tested by model year and vehicle type [CFR §51.366(a)(1)]
 1. See Appendix A.
- B. By model year and vehicle type, the number and percentage of vehicles [CFR §51.366(a)(2)]
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 7. Passing the on-board diagnostic (OBD) check
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 - a. See Appendix B.
 9. Failing the on-board diagnostic (OBD) check and passing the tailpipe test (if applicable)
 - a. Not applicable in Georgia's Enhanced I/M Program.
 10. Failing the on-board diagnostic (OBD) check and also failing the tailpipe test (if applicable)
 - a. Not applicable in Georgia's Enhanced I/M Program.
 11. Passing the on-board diagnostic (OBD) check and failing the I/M gas cap evaporative system test (if applicable)
 - a. See Appendix G.

12. Failing the on-board diagnostic (OBD) check and passing the I/M gas cap evaporative system test (if applicable)
 - a. See Appendix G.
 13. Passing both the on-board diagnostic (OBD) check and the I/M gas cap evaporative system test (if applicable)
 - a. See Appendix G.
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 - a. See Appendix G.
 15. MIL (Malfunction Indicator Light) is commanded on/illuminated and no codes are stored
 - a. See Appendix E.
 16. MIL (Malfunction Indicator Light) is not commanded on/illuminated and codes are stored
 - a. See Appendix E.
 17. MIL (Malfunction Indicator Light) is commanded on/illuminated and codes are stored
 - a. See Appendix E.
 18. MIL (Malfunction Indicator Light) is not commanded on/illuminated and codes are not stored
 - a. See Appendix E.
 19. Readiness status indicates that the evaluation is not complete for any module supported by on-board diagnostic (OBD) systems
 - a. See Appendix F.
- C. The initial test volume by model year and test station [CFR §51.366(a) (3)]
1. See Appendix O.
- D. The initial test failure rate by model year and test station [CFR §51.366(a) (4)]
1. See Appendix O.
- E. The average increase or decrease in tailpipe emissions levels for HC, CO and NO_x after-repairs by model year and vehicle type for vehicles receiving a mass emissions test [CFR §51.366(a)(5)]
1. Not applicable in Georgia's Enhanced I/M Program, no vehicle received a mass emissions test.



Section II. Quality Assurance Report

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Quality Assurance Report

The following report provides basic statistics on the quality assurance program for the reporting year of January 1, 2016, through December 31, 2016. It includes:

A. The number of inspection stations and lanes [CFR §51.366(b) (1)]

1. Operating throughout the year:

There were 697 inspection stations and 547 inspection lanes that operated throughout the year in Georgia's Enhanced I/M Program. Stations that operated throughout the year may have inspection lanes that operated only part of the year. This occurs when an existing station changes the number of test lanes it operates.

2. Operating for only part of the year:

There were 241 inspection stations and 716 inspection lanes that operated for only part of the year in Georgia's Enhanced I/M Program.

B. The number of inspection stations operating throughout the year [CFR §51.366(b) (2)]

1. Receiving overt performance audits in the year:

There were 938 inspection stations that received overt performance audits during the year in Georgia's Enhanced I/M Program.

2. Not receiving overt performance audits in the year:

There were zero inspection stations that did not receive an overt performance audit during the year in Georgia's Enhanced I/M Program.

3. Receiving covert performance audits in the year:

There were 846 inspection stations that received covert performance audits during the year in Georgia's Enhanced I/M Program.

4. Not receiving covert performance audits in the year:

There were 92 inspection stations that did not receive a covert performance audit. Of these stations, 15 stations were operating as fleet stations. The remaining 77 stations only operated for part of the year in Georgia's Enhanced I/M Program.

5. That has been shut down as a result of overt performance audits:

No stations were "shut down" as the direct result of an overt audit. In accordance with Georgia's Administrative Procedures Act, the Environmental Protection Division (EPD) cannot "shut down" a station, except through the administrative hearing process. Inadequacies found during an overt performance audit that would warrant temporarily closing a station are typically related to malfunctioning or faulty testing equipment.

When equipment problems are identified that might affect the integrity of the inspections, station owners are notified that they are not to conduct inspections until the equipment has been repaired and the accuracy of the equipment confirmed by a follow-up overt performance audit. Any station identified as conducting inspections after being so notified is cited for the violation and subject to: a suspension and/or monetary penalty through the consent order process; civil penalties through the administrative hearing process; or criminal charges, depending on the severity and gravity of the situation. Violations and penalties associated with overt audits are accounted for under question four below, part III, "That received fines - Stations".

C. The number of covert audits [CFR §51.366(b) (3)]

1. Conducted with the vehicle set to fail per test type:
 - a. See Appendix M.
2. Conducted with the vehicle set to fail any combination of two or more test types:
 - a. Not applicable in the in Georgia's Enhanced I/M Program.
3. Resulting in a false pass per test type:
 - a. See Appendix N.
4. Resulting in a false pass for any combination of two or more test types:
 - a. Not applicable in the Georgia's Enhanced I/M Program.

D. The number of inspectors and stations [CFR §51.366(b) (4)]

1. That were suspended, fired (revoked¹), or otherwise prohibited from testing as a result of covert audits:

	Licenses Suspended	Licenses Revoked
Inspectors	0	0
Stations	0	0

2. That were suspended, fired (revoked), or otherwise prohibited from testing for other causes:

	Suspended	Revoked
Inspectors	0	14
Stations	0	0

¹ Because it is a decentralized program, inspectors and stations are licensed by, not employed by the State of Georgia. Accordingly, the resulting action is to revoke a station's or inspector's license as opposed to firing them.

3. That received fines:

	Fined
Inspectors	0
Stations	0

E. The number of inspectors licensed or certified to conduct testing [CFR §51.366(b) (5)]

The total number of inspectors licensed or certified to conduct testing in 2016 was 4,406 (this includes all inspectors with an active license regardless of testing activity).

There were a total of 2,221 inspectors who attended training during 2016 (this includes all training types and retests). The new inspector certification class had 1,310 attendees. Of the 1,310 attending, 893 passed the course and became newly licensed emissions inspectors with full certification (OBD, ASM and TSI).

All currently active certified inspectors are required to receive re-certification training every two years; 911 inspectors attended the recertification training. Of the 911 attending, 884 passed the recertification.

New inspector certification and recertification training will continue to be offered by the management contractor. Classes will be scheduled as needed. The average numbers of new inspector and recertification training classes conducted per month in 2016 respectively were 3.00 and 3.00. Note: At least one inspector was assigned per station. Some inspectors were assigned to multiple stations (See Appendix O).

F. The number of hearings [CFR §51.366(b) (6)]

The State of Georgia uses a two-step enforcement process for inspectors and station owners that commit violations of the rules. They are first offered an opportunity to settle the allegations by way of an Environmental Protection Division (EPD) proposed settlement of suspension/revocation and/or negotiated monetary settlement through the consent order process. If a settlement cannot be reached at this level, an administrative order is issued seeking an elevated level of enforcement (license suspension or revocation). The inspector or station owner is given the opportunity to petition for an administrative hearing prior to the administrative order taking effect. The vast majority of enforcement actions are settled through the consent order process. For more serious violations, a citation is issued to place the alleged violation in state court for criminal prosecution.

There was one (1) hearing held during the reporting period of 2016; adverse actions were upheld against both inspector and station. The station closed prior to revocation; the inspector's license was revoked.

G. The total amount collected in fines from inspectors and stations by type of violation [CFR §51.366(b) (7)]

The fine amounts shown below are by violation type. In some cases where there were multiple violations against an inspector; EPD may have combined the total fine into one

violation code.

Code	Violation Type	Fines Collected
Total Fines Collected		\$0.00

- H. The total number of covert vehicles available for undercover audits over the year [CFR §51.366(b) (8)]

The management contractor uses multiple resources (private sale, auctions, etc.) to maintain a rotating fleet of covert vehicles. This fleet is varied in its composition of vehicle ages and types. For the 2016 test year, there were a total of 18 covert vehicles available for covert audits.

- I. The number of covert auditors available for undercover audits [CFR §51.366(b) (9)]

The management contractor trained all of its field auditors and most of its office staff as certified emissions inspectors. Personnel are also trained in Georgia's Enhanced I/M Program overt and covert audit procedures and enforcement requirements. During this reporting period, there were 17 covert auditors available for covert audits.



Section III. Quality Control Report

Quality Control Report

The following report provides basic statistics on the quality control program for the reporting year of January 1, 2016, through December 31, 2016. It includes:

- A. The number of emissions testing sites and lanes in use in the program [CFR 51.366(c) (1)]

During the reporting year, there were 938 inspection stations and 1,263 inspection lanes in use in Georgia's Enhanced I/M Program. Note: Not all of these stations or lanes were operational throughout the test year.

- B. The number of equipment audits by station [CFR §51.366(c) (2)]

In the reporting year, 2,490 equipment audits were performed. The management contractor performed equipment audits both during audits and during the certification of a station or lane. Note: Equipment audits were conducted during the audit types of: Certification Audits, Complete Audits, 5-Gas Audits, and 90-day Lockout Audits (See Appendix O).

- C. The number and percentage of stations that have failed equipment audits [CFR 51.366(c) (3)]

Based on the management contractor's equipment audits performed during station audits and during the certification of a station or lane, 565 stations failed; this equates to approximately 60 percent of the stations participating in the program. Note: Some stations had more than one lane.

- D. Number and percentage of stations and lanes shut down as a result of equipment audits [CFR §51.366(c) (4)]

No stations were "shut down" as the direct result of a failed equipment audit. In accordance with Georgia's Administrative Procedures Act, EPD cannot "shut down" a station except through the administrative hearing process. When equipment problems are identified that might affect the integrity of the inspections, station owners are notified that they shall not conduct inspections until the equipment has been repaired and the accuracy of the equipment confirmed by a follow-up overt performance audit. Any station identified as conducting inspections after being so notified is cited for the violation and subject to: a suspension and/or monetary penalty through the consent order process; civil penalties through the administrative hearing process; or criminal charges, depending on the severity and gravity of the situation.

- E. Additional Information Requested:

1. Reports on all audit activities

A summary of audit activities performed by the management contractor during the reporting year can be found in Appendix L.

2. Auditor Performance Evaluations

Monthly Auditor Performance Evaluations were performed for all field auditors employed throughout the reporting year. The evaluations consisted of the following criteria: number of audits scheduled/completed, completeness and thoroughness of recorded data/observations, enforcement effectiveness, and feedback from EPD staff/emissions station owners/inspectors, and results from ride-along evaluations performed by the management staff and the QA/QC Manager. The Overt Manager also performed ride-alongs, as well as unannounced follow-up field evaluations of the auditors' performance. EPD staff conducted follow-up audits of the management contractor's audits on a random basis. No significant issues or problems were identified.



Section IV. Enforcement Report

Enforcement Report

The following report provides basic statistics on the enforcement program for the reporting year of January 1, 2016, through December 31, 2016. It includes:

- A. An estimate of the number of vehicles subject to the inspection program derived from the vehicle registration database. [CFR §51.366(d) (1)]

2016 Registration Data²

County (County Code)	Vehicles Potentially Subject to I/M Program
Cherokee (35)	150,482
Clayton (13)	147,622
Cobb (7)	447,184
Coweta (27)	84,247
DeKalb (2)	379,892
Douglas (57)	88,069
Fayette (112)	78,670
Forsyth (79)	129,348
Fulton (1)	508,151
Gwinnett (16)	529,914
Henry (54)	134,452
Paulding (75)	91,168
Rockdale (89)	52,453
Total	2,821,652

- B. The percentage of motorist compliance based upon a comparison of the number of valid tests with the number of vehicles subject to the program.

As can be seen, the number of vehicles potentially subject to the I/M program (2,821,652 – based on the GRATIS registration database) is more than the number of initial inspections (2,814,265) performed in 2016. This total was derived by taking all initial tests

² The above table contains the number of vehicles subject to inspection for 2016. Data source: Georgia Registration and Title Information System (GRATIS) managed by the Georgia Department of Revenue (DOR).

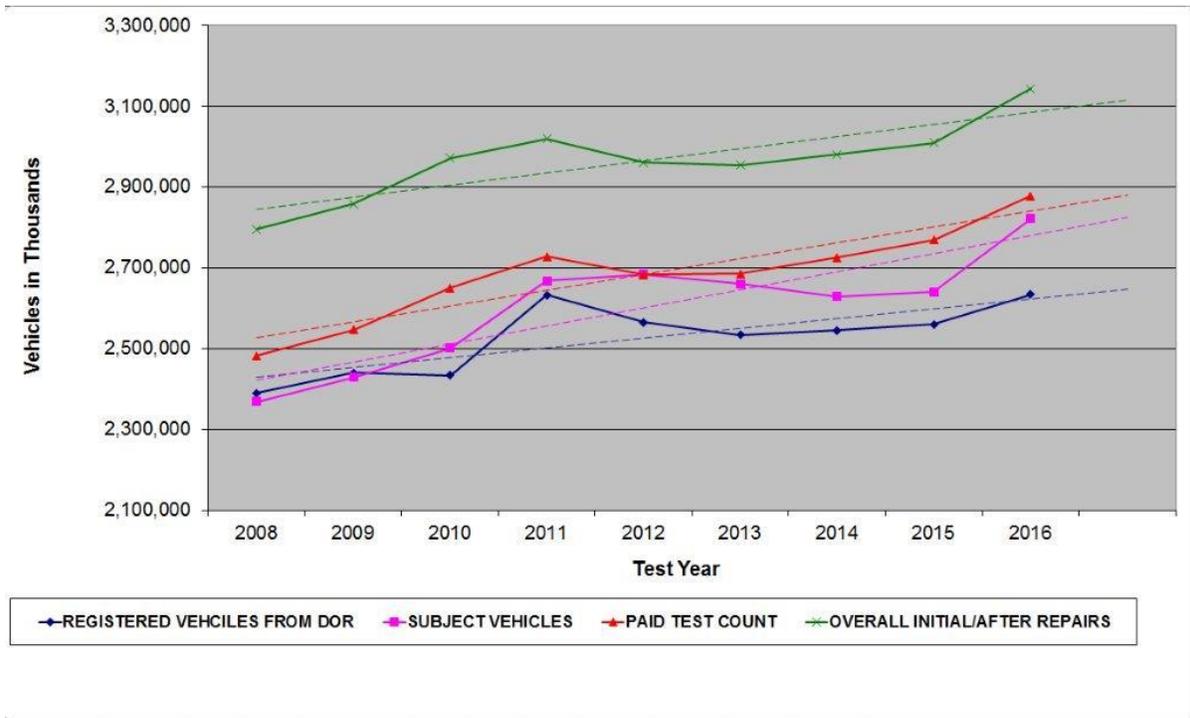
and excluding all aborts and covert tests. This difference can increase or decrease and can be attributed to any of the following.

1. The GRATIS database cannot accurately differentiate between light-duty trucks with a gross vehicle weight rating (GVWR) over or under 8,500 pounds.
2. There is no way of anticipating the number of vehicles not previously registered in Georgia entering the 13-county Atlanta area due to new residency or used car sales; however, these vehicles receive tests prior to being counted in the GRATIS data.
3. Senior Exemptions and Out-of-Area Extensions are not taken into account.
4. Most State of Georgia government agencies are headquartered in the metro Atlanta area and their vehicles are registered in an I/M program county, but many of these vehicles are permanently assigned to counties or areas a significant distance from the I/M program area and therefore are not required to be inspected.
5. The registration information is only a "snapshot" of the fleet when the data was retrieved from GRATIS.
6. Vehicles legally or illegally registered outside of the I/M program area.
7. VIN errors in the I/M inspection database and GRATIS.
8. Georgia excludes the newest three (3) vehicle model years.
9. Used car dealers and auction houses often inspect vehicles being sold even though these vehicles may not be sold to owners living the non-attainment area.
10. Vehicles which fail multiple times may have several initial inspections.

Of these, the most significant reason for this discrepancy appears to be the difficulty using the GRATIS registration data to differentiate between light-duty trucks (LDT) over or under the 8,500 pounds GVWR subjectivity threshold for the I/M program.

Also, starting in 2002, Georgia moved to electronic verification of vehicle liability insurance on GRATIS through the registration process; this continues to help clean up VIN errors in GRATIS.

The graph below illustrates data collected regarding registered vehicles in the 13-county non-attainment area, annual total tests performed, paid test volume, and the subject vehicle population for test years 2008 through 2016. This graph also illustrates the expected vehicle volumes projecting forward to test year 2017. As expected, subject vehicle numbers are less than the registered vehicles due to the several vehicle exemptions listed above. Tested vehicles indicate that more vehicles are tested than anticipated from the subject vehicle data for several reasons listed above.



C. Total number of compliance documents issued to inspection stations

Compliance documents (e-certificates of emissions inspections) are sold in blocks of 200 to new individual station owners and in blocks of 100 to past-standing individual station owners; they are issued electronically via the I/M inspection database by certificate number to each of the station's analyzers. All inventories are documented and accounted for in a database table. For each vehicle inspection performed, the analyzer e-certificate inventory is decremented by one and a hard copy of the official Certificate of Emissions Inspection is printed showing that unique certificate number assigned. The total number of certificates used is equal to the number of paid tests as shown in the database. During 2016, there were 2,878,951 certificates issued, which is more than the 2,768,949 certificates issued in 2015.

D. The total number of missing compliance documents

With the procedures described above for selling, issuing and accounting of e-certificates, the history in Georgia's Enhanced I/M Program has shown there is little cause for concern regarding "missing compliance documents." However, the potential for the production of counterfeit certificates continues to be of concern. With electronic matching of emissions inspections to the registration records on GRATIS, the occurrence of counterfeit certificates has been virtually eliminated. However, there are still instances when tag office clerk is presented with a paper Certificate of Emissions Inspection and no electronic verification of the inspection results is shown on GRATIS. In these cases, tag office personnel have become cautious, and utilize specific instructions on confirming the Test ID and visually identifying counterfeit certificates. The Test ID is a unique security number only printed on passing emissions certificates (generated by an algorithm that uses various test parameters from the vehicle's inspection). When a motorist presents a fraudulent certificate for vehicle registration, the tag office personnel notify either EPD officers or local law enforcement officers who charge the individuals with submitting false documents to a government agency, which can be a felony in Georgia.

E. The number of time extensions and other exemptions are granted

1. See Appendix K

- F. The number of compliance surveys conducted, number of vehicles surveyed, and the compliance rates found

The Environmental Protection Division (EPD) and the Department of Revenue (DOR) continue to improve upon the transfer of electronic data from the I/M inspection database to the Georgia Registration And Title Information System (GRATIS) database. Additionally, with better integration and utilization of inspection results by GRATIS and better understanding by county tag office clerks, the registration denial component of the program continues to become an increasingly effective tool to ensure program compliance. However, vehicles owned by the State of Georgia and any municipality or political subdivision in the state used exclusively for government functions are not issued tag expiration decals like privately owned or corporate vehicles. Once issued, the government license plates are good until the next five to seven year tag cycle for government agencies. Without annual registration renewal, it is possible that some government-owned vehicles are out of compliance with the I/M inspection requirement under a program enforced through registration denial.

Several methods are used to strengthen the relationship between government agencies operating fleets of vehicles and EPD. They include outreach and communication with fleet managers; semi-annual notices are provided reminding them of their obligation to inspect their subject vehicles each year.

For fleet vehicles owned and registered by various state agencies in Atlanta, but operated or assigned well outside of the 13-county I/M program area, EPD streamlined the process by which state fleet managers can obtain the proper Out-of-Area Extensions. State agencies can now adhere more closely to the inspection rules and better account for their subject vehicles driven in the 13-county metro Atlanta non-attainment area.

Each year EPD mails notifications to fleet managers reminding them of the program testing requirements, and that the five-year tag cycle does not exempt their vehicles from the annual testing requirement.

G. Information provided regarding program enforcement by registration denial. [CFR §51.366(d) (2)]

A report of efforts and actions to prevent motorists from falsely registering vehicles out of the program area or falsely changing the fuel type or weight class on the vehicle registration, and the results of special studies to investigate the frequency of such activity.

Preventing motorists from falsely registering vehicles out of the program area or falsely changing the fuel type or weight class on the vehicle registration is accomplished at the county level. Various means of detecting vehicles falsely registered out of the program area are also employed. At each county tax commissioner's office, property tax records and vehicle registration records are compared to reveal any inconsistencies between the location of the registered vehicle and the location where homestead exemption is claimed. Additionally, complaints from citizens regarding out-of-area vehicle registration are forwarded to the respective county tax commissioners' office for further investigation.

The measures taken to preclude vehicle owners from falsely changing the fuel type or vehicle weight for the purpose of seeking exemption from the I/M program are also taken at the county tag offices. An affidavit that indicates the change in fuel type or vehicle weight along with repair work-orders indicating engine or chassis modification are required at the time of vehicle registration or when the owner requests any change in the registration record.

H. The number of registration file audits, number of registrations reviewed, and compliance rates found in such audits

Registration file audits are done in conjunction with enforcement actions involving inspection stations or inspectors caught conducting fraudulent emissions inspections. Through the normal course of the investigation, suspect emissions test records are examined for signs of validity. Any that appear to have a likelihood of being fraudulent are further investigated on the registration database for signs of fraudulent activity. Although these audits or activities are not specifically tracked or tabulated, practically all investigations involve review of registration records.



Section V. Public Information and Consumer Protection Program (PI&CP)

In 2016, Georgia's Clean Air Force (GCAF) celebrated its 20th anniversary and GCAF's Public Information and Consumer Protection Program (PI&CP) continued its robust and successful public outreach initiatives. Highlights included a vibrant 20th anniversary campaign to celebrate the programs' accomplishments, extensive social media marketing efforts (utilizing Facebook, Twitter and YouTube), and enhanced media relations efforts. Other outreach efforts in 2016 included developing a communications strategy that helped facilitate a seamless rollout of Phase V software for emissions station owners and managers. Additional information about GCAF's PI&CP initiatives is available upon request – please contact Pamela Earl at 404/363-7000.