



Air Resources Board



Mary D. Nichols, Chairman

9480 Telstar Avenue, Suite 4
El Monte, California 91731 www.arb.ca.gov

Linda S. Adams
Secretary for
Environmental Protection

Arnold Schwarzenegger
Governor

June 7, 2010

MAILOUT # MSO 2010- 02

TO: ALL MANUFACTURERS OF

- PASSENGER CARS
- LIGHT-DUTY TRUCKS
- MOTORCYCLES
- MEDIUM-DUTY VEHICLES AND ENGINES USED IN SUCH VEHICLES
- HEAVY-DUTY VEHICLES AND ENGINES USED IN SUCH VEHICLES
- ALL OTHER INTERESTED PARTIES

SUBJECT: Proposed Minor Amendments to the Periodic Smoke Inspection Program (PSIP) in Response to Diesel Vehicle Smog Check Implementation

This Mailout supersedes Mailout MSO # 2009-04 dated July 30, 2009 requesting comments on a proposal involving on-road diesel-powered vehicles and engines in customer use which are subject to the provisions of the Periodic Smoke Inspection Program (PSIP). After further discussion and review of comments on the July 30, 2009 proposal, staff has revised its recommendation and presents a new proposal. The proposal would amend the PSIP regulations (Title 13 California Code of Regulations, Section 2190, et seq.) to better coincide with the requirements of Assembly Bill (AB) 1488 (Mendoza, Chapter 739, Statutes of 2007 – Smog Check for Diesel Vehicles).

Background

PSIP

The ARB's PSIP was signed into law in 1990 (Senate Bill 2330) to control excessive smoke emissions and tampering from commercial heavy-duty trucks and busses. The PSIP requires that owners of California based fleets of two or more diesel vehicles with gross vehicle weight ratings (GVWR) of greater than 6,000 pounds conduct annual smoke opacity inspections of their vehicles, repair those with excessive smoke emissions to ensure compliance and retain applicable records for a minimum of two years. Based on the original rulemaking for the PSIP, staff estimates that 379,242 vehicles in about 12,600 fleets are subject to PSIP in 2010.¹ The ARB randomly audits

¹ California Air Resources Board, "Staff Report: Initial Statement of Reasons for Proposed Rulemaking. Public Hearing to Consider Proposed Amendments to California Regulations Governing The Heavy-Duty Vehicle Inspection Program (HDVIP) and the Periodic Smoke Inspection Program (PSIP), October 1997, pp 21.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

6/7/2010

Page 2

fleet maintenance and inspection records. All vehicles that do not pass the test must be repaired and retested. The program is well established since its implementation in July 1998. More information regarding the PSIP can be accessed at:

<http://www.arb.ca.gov/enf/hdvip/hdvip.htm> or through a request for hard copies to the ARB staff listed at the end of this document

Diesel Smog Check

Assembly Bill 1488 mandated, beginning January 1, 2010, that diesel passenger cars and trucks, manufactured after the 1997 model year with GVWR of 14,000 pounds or less to be included in the California Smog Check Program. The diesel Smog Check Program is registration based and requires all California vehicles to undergo emissions checks on a biennial basis. The program is administered by the Department of Consumer Affairs, Bureau of Automotive Repair (BAR) with assistance from ARB. Diesel smog check inspections beginning in 2010 will consist of a visual inspection of the emission control devices, an interrogation of the vehicle's on-board diagnostic (OBD) system, and a visual assessment of the vehicle's smoke level. ARB estimates that about 510,700 diesel vehicles will be subject to the diesel Smog Check Program, the vast majority of which are privately owned and not subject to the PSIP.

Concurrent PSIP and Smog Check Program Impacts

Since the current PSIP requires all diesel-powered vehicles with GVWR greater than 6,000 pounds that are part of a fleet of two or more vehicles to be inspected annually for excessive smoke and AB 1488 now includes all vehicles with GVWR of 14,000 pounds or less to be included in the Smog Check Program and tested biennially, an estimated 76,740 vehicles will now be subject to both programs in 2010. A PSIP inspection ranges in cost from \$40 to \$100 with an average cost of about \$55 per test. The BAR estimates the cost of a diesel smog check to be \$47.25. However, the incremental emission benefits of simultaneously conducting both programs in a single year are estimated to be minimal or absent. Since the primary focus of PSIP is smoke or particulate matter (PM), we can say that the visual smoke test in Smog Check will provide the same or similar benefit as the opacity test conducted in the PSIP. In addition, smog checked vehicles will also undergo an OBD evaluation and visual tamper inspection, enhancing the ability to correct polluting vehicles for not only smoke but also other pollutants. Staff conservatively estimates that, for the 76,740 PSIP vehicles impacted, a change from an annual to a biennial PSIP inspection will result in immeasurable adverse PM emissions impacts. If the annual PSIP smoke test was substituted with Smog Check inspection in alternate years so that an affected vehicle is subject to one of the two forms of inspection every year, there would be no adverse PM emissions impact. However, staff expects that the synergistic effects of the PSIP and the Smog Check Program will provide some nominal gaseous emissions benefits beyond the PSIP inspection.

6/7/2010

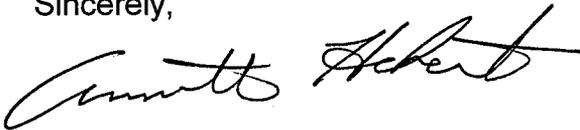
Page 3

PSIP Regulation Proposed Amendment

ARB staff proposes to present regulatory amendments to the Board on the current PSIP program to allow commercial truck fleets, which are subject to both the PSIP and the Smog Check Program, to submit evidence of passing a Smog Check test; either by means of a Vehicle Inspection Report (VIR) or other documentation deemed acceptable by staff as proof of compliance with the PSIP. For those years when a Smog Check test is not required, the vehicle would still be required to perform a PSIP smoke inspection. Submission of documentation of a passing Smog Check inspection, in lieu of a PSIP annual smoke opacity inspection, would only be for those calendar years when a Smog Check inspection is required. This exception would apply to 1998 and subsequent model-year vehicles with GVWR of 14,000 pounds or less and are currently subject to the PSIP. All 1997 or earlier model year diesel vehicles and those diesel vehicles with GVWR of 6,000 pounds or more, that are part of a fleet of two or more vehicles, will continue to be subject to the PSIP.

Staff is requesting written comments be submitted regarding this proposal by July 6, 2010 to Ms. Annette Hebert, Chief, Mobile Source Operations Division, Air Resources Board, 9480 Telstar Avenue, Suite 4, El Monte, California 91731. If you have any immediate questions or concerns regarding amendments to the PSIP, please contact Mr. Robert Ianni, Air Resources Engineer at (916) 322-0845 or rianni@arb.ca.gov or Mr. Wayne Sobieralski, Air Resources Engineer at (916) 323-1099 or wsobiera@arb.ca.gov.

Sincerely,



Annette Hebert, Chief
Mobile Source Operations Division