

## Peter Bella

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**From:** Peter Bella  
**Sent:** Thursday, April 29, 2010 2:30 PM  
**To:** Renee Green (rgreen@co.bexar.tx.us); Renee Green (rgreen@bexar.org)  
**Cc:** Dean Danos  
**Subject:** Clean Screening vehicle emissions testing program

Renee,

In late March 2010, I had a visit from several consultants who are promoting Clean Screening as a program to accompany a more-typical state vehicle emissions testing program. As you know, if a region is declared nonattainment for ozone and classified Moderate or above (only the classification of Marginal is lower than Moderate), then a vehicle emissions Inspection and Maintenance program is required.

A Clean Screen process would allow those vehicles which have driven in front of appropriate roadside remote sensing devices and “passed” the screening test to be exempted from an annual state vehicle Inspection / Maintenance emissions test.

EPA has only draft guidance on the topic, issued in May 1998. In it, EPA states,

“Clean screening is designed to exempt certain cars from the I/M requirement, on the strength of other evidence of the high probability that they are clean enough to pass anyway. Based on a preliminary assessment of data currently available, EPA believes it is possible to excuse up to one-third of cars from inspection each year, with only a 5 to 10 percent loss in emission reductions.” [1]

- The idea of implementing I/M has not been popular in Bexar County and the surrounding Metropolitan Statistical Area.
- Depending on our classification if and when we are designated nonattainment for ozone, establishment of an I/M program may be required.

Clean Screening may be one way to make I/M more easily acceptable in our region. The concept that “up to 1/3 of cars” may be excused from mandatory vehicle tests might be of real assistance in easing any discomfort associated with implementation of an I/M program. Note that Clean Screening is distinct from “dirty screening” in which cars “failing” the test from the remote sensing device are required to report to an I/M certified testing station and to undergo a routine I/M inspection.

One of the visitors to the office was Drew Rau, who works as Remote Sensing Manager for Envirotec Systems to operate the State of Colorado’s Clean Screening program within their Air Care Colorado program (<http://www.aircarecolorado.com/>). Point being Clean Screening has been established as a SIP-creditable program in operation elsewhere. Not in Texas. Another of the visitors was Jim Brandon with Environmental Systems Product HLD, manufacturer of the clean screening equipment used in the Colorado program.

In short, they’re hoping that San Antonio is interested in helping them break into the Texas market by establishing a Clean Screen program in conjunction with a regular state I/M program.

I believe it would be appropriate to have a presentation before the AIR Technical Committee on the technology, its related benefits and issues, to answer some questions and... let folks get used to the idea of an I/M program.

I anticipate you’d prefer to wait until we know more about the revised ozone standard prior to arranging a presentation. I anticipate that you’d prefer to see a determination that the final ozone standard was stringent enough and our ozone levels were high enough that we arguably should concern ourselves with preparation for a Moderate nonattainment classification in March 2011 before we extend an invitation.

Comments? Advice?

-Pete

[1] Page 1, "Remote Sensing & Clean Screening in Inspection and Maintenance Programs," EPA 420-F-98-023, May 1998.  
Available online:

<http://www.epa.gov/oms/models/rsd/f98023.pdf>

See also EPA's "Vehicle Clean Screening / Vehicle Profiling & Remote Sensing Device (RSD) Issues" page:

<http://www.epa.gov/oms/rsd.htm>