

THE NEVADA CLEAN AIR BULLETIN

State of Nevada
Department of Motor Vehicles

Management Services and
Programs Division

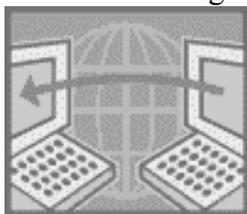


555 Wright Way
Carson City, NV. 89711

A NEVADA I/M PROGRAM INFORMATIONAL LETTER

VEHICLE INFORMATION DATABASE (VID)

A Vehicle Information Database (VID) is being developed and will be operated by the Department of Motor Vehicles after April 30th, 2007. The decision to develop a VID internally was reached by Department administration after evaluating all the options available after an award to a new contractor was challenged and upheld during the first quarter of this year.



The Electronic Transmission Fee will no longer be included in the emission test cost when the new VID is placed into service. Some functions, such as purchasing new groups of Vehicle Inspection Report Numbers will be a bit different in the new VID. There will also be a number of reports on the VID that will be available to station operators.

We will keep you updated on the progress of the VID development during the upcoming months.

QUESTIONS FROM THE INDUSTRY

Recently, industry representatives submitted a couple of questions, which seemed more appropriate to address with the entire industry.

QUESTION: *“If a station owner finds an inspector has illegal emission tests and terminates the inspector, will the Department of Motor Vehicles take action towards the station?”*



ANSWER: Every case must be evaluated and dealt with on an individual basis. It is impossible for the Department to provide a blanket type answer to the industry with regards to this question. 51.364 of the Federal Code of Regulations states that the oversight agency shall have the authority to impose penalties against the licensed station, as well as the inspector, even if the licensee had no direct knowledge of the violation but was found to be careless in oversight of inspectors or has a history of violations. 445B.4985 of the Nevada Administrative Code also explains the station owner’s responsibilities with regards to their employees.

QUESTION: *“Can a Test Only Emission Station perform a pre-test on a vehicle (4-gas or OBDII), to determine if it meets requirements for a re-inspection test?”*

ANSWER: The Federal Code of Regulations specifically forbids any type of vehicle pre-testing if an initial emission test has not yet been performed. Nothing is mentioned in the CFR’S with regards to pre-testing of a vehicle that has

failed an initial test has had repairs and the owner wants to know if the vehicle will pass a re-inspection. However, Nevada Administrative Code 445B.460(4) specifically states that a facility which holds a license as an authorized inspection station or Class 1 fleet station may test exhaust emissions but shall not perform any installation, repair, diagnosis or adjustment to devices that affect exhaust emissions. A Test Only station cannot diagnose a vehicle. A pre-test is a form of diagnosis.

What the Department is looking into, to help Test Only stations with this task is development of a “Retest Qualifier” application for the emission analyzer. This application will provide a series of prompts for the Test Only station to follow, which will provide the needed information, without having to diagnose whether or not the vehicle is ready for a re-inspection. This application might be included in the analyzer as part of the VID implementation.

We will keep you updated on the feasibility of a “Retest Qualifier” application during the upcoming months.

I/M SOLUTIONS CONFERENCE

The I/M Solutions Conference was held in St Louis Missouri during May of this year. One representative of the Department of Motor Vehicles attended the conference. Some of the topics discussed during the conference were:

- Having USEPA OTAQ update the list of OBDII vehicles which have testability issues
- The affect the new USEPA modeling program, MOVES, will have on gauging the effectiveness of I/M Programs, with possible reduced credits for I/M Programs that are used for State Implementation Plan development
- New methods of testing OBDII vehicles for emissions compliance. New methods include self-serve OBDII Kiosks, and Remote Frequency Transmission of OBDII data

- A broader scope of repair training available to industry members.

To gather feedback from the Nevada Test & Repair industry, a survey questionnaire will be sent through the analyzer ET Messaging system in the very near future. The survey will have a number of questions inquiring what Test & Repair industry considers the most important training that should be made available to them. If you are a Test & Repair station, please take some time to answer this questionnaire and provide it to a DMV Emission Control Technician when they are at your business conducting their monthly overt audit.

2G STATION LIST

A number of program stakeholders noted at a recent regulation hearing that it is difficult obtaining updated lists of 2G stations. The Department is responding to the stakeholder concerns:

- 1) 2G lists will continue to be available on the DMV Website. This list will be updated at minimum, two times each month and is now sorted by zip code, so that motorists will have an easier time of finding a 2G station within a specific area of the city.
- 2) Station operators can receive a copy of the list by e-mail, each time it is updated, if they would send their e-mail address to: iharper@dmv.nv.gov Ivie will set up an e-mail group of stations that would like to receive the 2G list by e-mail.
- 3) DMV staff will provide a copy of the 2G list each month during overt audits.

The Department would appreciate some help from you, in order to make this list work effectively. Please review your latest station information found on the list available from the Department of Motor Vehicles website:

<http://www.dmvnv.com/emission.htm> If you find any of the information on the list for your station is outdated, please notify Ivie Harper of the needed changes by e-mail at: iharper@dmv.nv.gov or by telephone at (775) 684-4805.

ANNUAL USEPA REPORT

DMV has prepared the annual emission report, which is provided to USEPA by July 1st. Highlights of the statistical data for Calendar-Year 2005 will be included in the Second Quarter Newsletter. Listed below is some general statistical information for CY 2005:

Initial Tests (Light Duty)	Passed	Failed	Total	% Fail
Clark County	863,518	61,911	925,429	7.2
Washoe County	229,305	16,784	246,089	7.3

Initial Tests (Heavy Duty)	Passed	Failed	Total	% Fail
Clark County	23,481	1,274	24,755	5.4
Washoe County	12,477	684	13,161	5.5

Re Tests (Light Duty)	Passed	Failed	Total	% Fail
Clark County	69,693	7,059	76,752	10.1
Washoe County	17,418	2,828	20,246	16.2

Re Tests (Heavy Duty)	Passed	Failed	Total	% Fail
Clark	1,388	108	1,496	7.8

County				
Washoe County	708	93	801	13.1

RECOGNIZING NEVADA LICENSE PLATES

The Department has heard of instances when an inspector is not able to enter the correct license plate “style”. The “style” of the plate is what the Department classifies as a “prefix”. The prefix is the plate “style” not printed on the actual license plate, for example, the plate Lake Tahoe shows the prefix is LT.

Below, the Department is providing a list of prefixes for your use. If you would like to receive a separate list, you may contact Debbie Shope by e-mail dshope@dmv.nv.gov.

Plate Description	Plate Prefix	*Length After Plate Prefix	Maximum Length if a Personalized Plate
Antique Vehicle Truck/Tractor	AVT	3	
Civil Air Patrol	CVAP	4	
Classic Rod	CROD	4	
Classic Vehicle	CVEH	4	
Collegiate – UNLV	ULV	5	5
Collegiate – UNR	UNR	5	5
Congressional Medal of Honor	CONMH	2	2
Consular Corps	CON	3	
Disabled	PH	5	
Ex-Prisoner of War	POW	3	
Fire Truck	FT	4	
Hall of Fame	HF	5	5

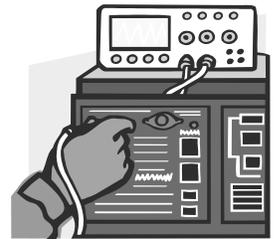
Enter the plate prefix plus the numbers after the plate prefix.

OBD-II Versus Emission Testing

By Alexis Gross
Automotive Service Association

Vehicle onboard diagnostics (OBD) has evolved over the last 20 years. What began as a small set of manufacturer-specific tests and communication protocols has evolved into a complex, comprehensive diagnostic system able to detect literally hundreds of failures that could cause drive ability concerns or emission increases. This rapid evolution has been driven by California's technology-forcing OBD-II regulations as well as the need for manufacturers to provide comprehensive diagnostics to allow technicians to service the complex engine and transmission controls on today's vehicles. As technology improves, states are relying on onboard diagnostics for inspection and maintenance (I/M) programs in place of tailpipe emission tests.

"If the state is in noncompliance with ambient air quality standards, one of the only mandatory aspects of that compliance is mandatory inspection and maintenance programs," said Mike McCarthy, manager of advanced engineering for the mobile source control division for the California Air Resources Board (CARB). "The EPA also says I/M has to include using the OBD-II system. The other thing that drives states with regard to I/M is how much emission credit the EPA says they're going to get from running various emissions programs."



One thing that model says is that an OBD-only program provides at least as much benefit to air quality as a tailpipe test. States are always looking for the most cost-effective program that gives them the most emissions bang for their buck, and this, along with when the state contract with the

Plate Description	Plate Prefix	*Length After Plate Prefix	Maximum Length if a Personalized Plate
Nevada National Guard	NG	4	
Old Timer	OT	4	
Pearl Harbor Survivor	PHS	3	
Pearl Harbor Veteran	PHV	3	
Press	PRS	3	
Purple Heart	HRT	5	
Veteran – Air Force	VF	4	5
Veteran – Air National Guard	GA	4	4
Veteran – Army	VA	4	5
Veteran – Army Airborne	VA	4	4
Veteran – Army Nat'l Guard	GS	4	4
Veteran – Coast Guard	VC	4	5
Veteran – Marines	VM	4	5
Veteran – Navy	VN	4	5
Veteran – Navy Seabee	VN	4	4

Empty space indicates plate is unable to be personalized.

*Length after plate prefix – means how many numbers are after the prefix. Example – CVAP0144 (Civil Air Patrol 0144)

network contractor is up, are the two great determiners of how soon many states will be switching to OBD-only testing programs. Robert L. Redding, ASA's legislative representative in Washington, D.C., said, "Clearly, regulators are encouraging OBD-II testing. We need to spend more of our resources on expanding programs in areas with air quality issues or that contribute to communities in nonattainment. The trends for testing are evident; we should support these programs if possible, and work with those administering the programs. Expansion of the programs is the key to the repairer's I/M future."

One of the benefits to OBD testing is that its equipment is dramatically less expensive than that needed for tailpipe testing. For states just beginning their I/M programs, it makes sense to begin with an exclusively OBD-II program. A full tailpipe testing workstation costs in the area of \$40,000, whereas OBD-II testing requires little more than a scan tool and a modem. Some states don't even need a printer for a window sticker, since the inspection information is stored on the state motor vehicle database and tied to the vehicle registration.

McCarthy believes OBD-II testing alone can give as many or more benefits than tailpipe testing. For one thing, the system is constantly operating, monitoring any problems the vehicle experiences, thus it catches trouble long before a tailpipe test could detect it.

For another thing, he said, as manufacturers continue to improve their vehicles, sources other than the tailpipe are becoming a larger culprit in emissions failures, like the evaporation system.

"OBD does a leak check on the evap system. Most state's tailpipe tests at most have a gas cap test. OBD tests the whole evap system," McCarthy said. "As cars have lower and lower tailpipe emissions, evap emissions play a larger and larger role. Hydrocarbon emissions are greater from the evap system than from the tailpipe. Most tailpipe

tests are blind to evap failures, so there alone you will pick up benefits that tailpipe testing doesn't have any chance of catching."

One question receiving a lot of study is whether OBD-II testing is as - or more - effective than tailpipe testing.

"It really is a state-by-state issue," said Chuck Rhodes, inspection and maintenance district supervisor for the Wisconsin Department of Transportation. "Wisconsin state law requires emissions testing of '68 and newer vehicles. Some states are hitting 86 percent of the fleet that is '96 and newer. We're 55 percent '96 and newer."

Other states, such as California, have a much older fleet of cars on their roads, and need as much emissions credit from the EPA as they can get. State law requires that all cars, even those that are OBD-II capable, undergo tailpipe testing.

Rusty Savignac, co-owner of Paxton Garage in Paxton, Mass., was involved in the development of the Massachusetts emissions test. He said about 6 percent to 10 percent of vehicles fail the OBD-II inspection, much higher than the near 3 percent that fail the tailpipe test.



"It's a controversial subject," he said. "It depends on the type of tailpipe test being conducted. Every state is different and they vary in accuracy and comprehensiveness. Our experience in Massachusetts was that it was a rare occasion not to fail both tests. Most cars that failed the OBD-II test failed the tailpipe test.

"That has a lot to do with the ability of the redundant systems in the car that keep emissions in control. Secondly, our tailpipe testing limits are somewhere near six times the federal test procedure (FTP) limits for the car. In theory, the malfunction indicator light (MIL) is supposed to

come on when the potential exists for emissions to exceed 1.5 times the FTP."

Joe Torchiana is concerned that this formula will not continue to work in high-mileage vehicles. Torchiana owns One Stop Tire & Auto Service Inc. in West Chester, Pa., and is current chairman of ASA's Mechanical Division Operations Committee's Emissions Testing Subcommittee. McCarthy sees things differently.

"We are rapidly approaching a point where our (tailpipe testing) equipment will not be able to determine clean and dirty cars because FTP standards are for lower and lower emissions levels," said McCarthy. "You can use this equipment to pick out the dirtiest of the dirty, whereas in the past it tried to catch cars at moderate levels. OBD equipment is correlated to work for the standards a specific car is built to, versus a tailpipe test that is supposed to fit every car out there. If tailpipe testing is going to serve a role, it's going to serve a different role than it does today.

What is the future, then, of OBD-II and emissions testing? Technology exists today that would allow inspections to take place without any contact with an inspection station or repair facility. FM or cellular transmitters can relay OBD information to a state information database or the nearest manufacturer dealership. Systems like OnStar are capable of performing emissions tests. Self-service OBD-II kiosks, like ATM machines, have been suggested. Motorists could even perform their own emissions inspection at home and send their results in to their state program.



As testing becomes more and more remote, however, the maintenance part of inspection and maintenance programs could become even more difficult to enforce than it already is, said Torchiana. He worries that the emphasis placed on training inspectors to administer the test rather

than training technicians to repair the problems is a great shortcoming of emissions testing programs.

"Emissions testing programs are a mandate for the consumer to fix the car and the technician to make money if he fixes it properly," he said. "I'm not aware of any other industry where the federal government makes a customer pay money to take care of their product and enforces maintenance and repair of that product, and we (technicians) are the ones that fumble and don't fix the cars." Most states that have I/M programs require emissions inspectors to undergo training and certification in the inspection process. In most places, that training must be renewed every two years. In addition, some states require that emissions-related repairs be performed by a licensed technician.

In California, said McCarthy, "not as much time is spent on diagnosing and understanding the trouble codes that come up during inspection. It's actually illegal for inspectors at inspection-only stations to offer advice or repairs. The focus of training is mainly on the rules and procedures to run the test. Most data is sent electronically and is not subject to interpretation."

The pass/fail nature of emissions testing is partly to blame, said Torchiana.

"There's no marginal failure, so there's no impetus for the technician to plug into the car and find out if it's good, bad or indifferent," he said. "It's pass/fail instead of a grade point. I think there's information available in the data stream to determine performance better than just a pass/fail."

As in the rest of auto repair and service, ongoing training is the key to a good repair and a profitable shop, said Rhodes.



"I look at OBD-II as a tool, like the computer on my desk," he said. "Its job is engine control and it does it electronically rather than mechanically. It also can detect emission components and tell you when they're failing. You still have to go to school and train, or OBD-II will just be another wrench in the box that you don't know how to use. "

And that wrench will continue to sit in that box and grow in size and importance, said Rhodes.

"If you throw emissions out of the discussion, onboard diagnostics is the way cars are built," he said. "The industry is not going back. In the type of cars that are built now, the engines last longer and OBD-II lets them last longer because they're running more efficiently.

"OBD-II is an integrated system that can improve how a vehicle operates. It started as emission control, but like any computer, you can expand the capability of what it does. OBD-II can make repairs as it goes down road, like minor corrections in timing. When the MIL actually lights up, that means the car tried to fix itself and identified something it can't do, and it's asking you to repair it."