



p.o. box 8477 • harrisburg, pa. 17105-8477 • (717)787-4526

Environmental Quality Board

September 10, 2007

Dear EQB Member:

The Department of Environmental Protection (DEP), in consultation with the Pennsylvania Department of Transportation (PennDOT), is required by *25 Pa. Code* § 126.451(3) (relating to responsibilities of the Department) to study and evaluate the feasibility of modifying the Commonwealth's vehicle emission Inspection/Maintenance (I/M) Program, in consideration of the additional emission reduction benefits expected through implementation of the Pennsylvania Clean Vehicles Program. The Department is required to submit this evaluation to the EQB no later than September 10, 2007.

Based upon the collective analysis of DEP and PennDOT, it is concluded that modification of the Commonwealth's I/M Program is not advisable, nor practical. The federal Clean Air Act mandates that Pennsylvania have an I/M program. Further, federal law lays out precise and exacting requirements that I/M programs must meet. Moreover, any modification to the Commonwealth's I/M program, in addition to being such that federal performance requirements are still met, must be accompanied by new and additional air quality requirements such that there is no "backsliding" with respect to air quality. Those new and additional requirements would have to be developed and implemented contemporaneously with any modification. As presented in detail here, the Commonwealth's I/M program only just meets federal performance criteria, leaving little or no room for modification.

If you have questions regarding this report, please feel free to contact Joyce Epps, Director, Bureau of Air Quality, by telephone at 717-787-9702 or by e-mail at [jeepps@state.pa.us](mailto:jeepps@state.pa.us).

Sincerely,

A handwritten signature in blue ink, reading 'Kathleen A. McGinty', is written over a light blue circular stamp.

Kathleen A. McGinty  
Chairperson  
Environmental Quality Board