



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

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December 30, 2011

Anne E. Arnold, Manager  
Air Quality Planning Unit  
EPA New England  
One Congress Street, Suite 1100  
Boston, MA 02114-2033

Dear Ms. Arnold:

Enclosed please find the 2010 Annual Report for the Massachusetts I&M program addressing the requirements of 40 CFR 51.366(a)-(d). The report documents successful operation of the Massachusetts I&M program, during the second full year of the Massachusetts Vehicle Check Program.

In your April 28, 2011 letter to me about Massachusetts' 2009 Annual Report, you noted two issues. These issues and our responses are described below:

*Issue 1:* The compliance rate should be based on emissions testing of registered vehicle required to undergo such testing.

*Response:* MassDEP has continued to coordinate with the Massachusetts Registry of Motor Vehicles (RMV) regarding the ability of the current registration data system to identify vehicles subject to emissions testing. The obstacle Massachusetts faces remains the substantial resources required to obtain this information from the current registration data system due to its limitations.

Until the registration data system is upgraded, which is currently not scheduled to happen for several years, Massachusetts regrets that it currently has no alternative to its present methodology for determining compliance rate for the annual EPA report.

*Issue 2:* EPA noted the delay in covert audit practices since the new program began in 2008, due to pending completion of covert audit procedures, training, and software, and indicated that EPA looks forward to seeing the results of covert audits in future reports.

*Response:* In 2010, the Network Contractor performed 2,115 covert vehicle audits. The unusually high number of covert vehicle audits in 2010 was due to the Network Contractor successfully catching up on the 2,000 (677 + 1,333) vehicle audits Massachusetts was committed to perform between October 1, 2008 and September 30, 2010.

To save paper and to allow EPA to review and sort the detailed test data contained in the 2010 Annual Report's attachments, the enclosed submittal includes a CD containing the files for Attachments B (Detailed 2010 Emission Test Data) and C (2010 Test Data by Station).

Please let us know if you have any comments or questions on the attached reports. We look forward to continuing to work with you on the Commonwealth's I&M Program.

Sincerely,

Christine Kirby, Deputy Director  
Transportation Programs  
Bureau of Waste Prevention

cc:

Sarah Weinstein, BWP  
Gary Moran, MassDEP  
Michael J. Byrne, RMV  
Mark LaFrance, RMV  
Ariel Garcia, EPA