

VIA ELECTRONIC MAIL

September 11, 2012

Docket Administrator  
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**Re:** Agency Information Collection Activities, Docket ID No. EPA-HQ-OAR-2008-0707

Dear Docket Administrator

The Department of Energy and Environmental Protection (Department) respectfully submits the following comments in response for the August 21, 2012 federal register request regarding *Data Reporting Requirements for State and Local Vehicle Emission Inspection and Maintenance (I/M) Programs*. EPA requested comments on the potential renewal of the reporting requirements for the annual and biennial reports for the Motor Vehicle I/M Program. The Department recommends streamlining reporting requirements by moving to biennial reporting, standardizing reporting requirements across regions and developing a national database of vehicles with no known outcome as well as providing greater oversight of problematic state programs.

EPA specifically requested comments on the resource burden the current requirements place on the states. EPA maintains the time required for data collection activity is low because that data is already collected and evaluated by states running more efficient programs. The data is available and is comprehensively and continuously evaluated by the state on a regular basis; however, the existing systems focus on maintaining and enhancing operational effectiveness, which is quite different from EPA reporting. The Information Collection Request (ICR) recognizes that programmatic needs differ from ICR reporting burden. In Connecticut, report preparation requires additional resources dedicated to extracting specific required data from the database, transfer of the data among the vendor who operates the program, the Department of Motor Vehicles (DMV), and the Department's staff and a reporting consultant who develops the report, formatting information to comport with EPA's report checklist, as well as additional formatting as requested by EPA Region 1 to simplify their review.

EPA maintains that the reporting and recordkeeping for this collection of information is 86 hours. Unfortunately, EPA's estimate is not accurate. During the Department's last request for proposals for contractor support to prepare the I/M report, the single submitted bid indicated the annual report would take 152 hours to complete, remote sensing data evaluation would require 60 hours to analyze, and the complete biennial report would require 182 hours to complete. In addition to

the consultant's time, the Department estimates that at least 140 hours of staff time were required for the Department to independently format and verify the contractor's information, and an additional 40 hours for consultation with DMV with their contractor, totaling 362 hours for the latest biennial report. This represents over four times the estimate per year that EPA claims and is consistent with the Department's resource commitment over the past six years. The Department is very interested in obtaining EPA's assistance to LEAN the I/M reporting process in an effort to reduce the resources necessary to meet EPA's reporting needs going forward.

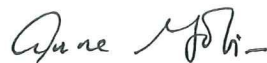
The Department strongly recommends that reporting be decreased to once every two years especially due to the small amount of change in reporting data from year to year. While the ICR maintains that decreasing the frequency of reporting could allow problematic programs to continue unabated for a longer period of time, EPA should focus their oversight and support on the programs where concerns exist. Focused oversight could include EPA site visits and quarterly monitoring of problematic programs to improve effectiveness and ensure that any potential programmatic weaknesses are properly identified and corrective measures initiated.

The Department also recommends that EPA adopt a consistent interpretation of compliance from region to region. The ICR maintains that states are free to adopt whatever reporting format results in the least burden. The Department's reporting elements, many of which are included at the request of Region 1, appear to be far more extensive than the requirements of other regions. For example, the Department's report includes a comprehensive evaluation of the data and summaries as well as comparisons between years, whereas other regions accept the data without any evaluation.

To enhance oversight of vehicles with no known outcome, the Department recommends that EPA devote resources to developing a national database on these vehicles. This is critical because individual states cannot track the interstate movement of vehicles.

Due to limited state resources, to the Department must be more efficient and focus on those efforts that produce real environmental benefit. This ICR presents an opportunity for EPA and the states to streamline the process, while maintaining the air quality benefits. If you have any questions on these comments, please do not hesitate to contact Ellen Pierce at [Ellen.Pierce@ct.gov](mailto:Ellen.Pierce@ct.gov).

Sincerely yours,



Anne Gobin  
Chief, Bureau of Air Management

cc: Dave Conroy, Region 1