



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100

Boston, MA 02109-3912

November 5, 2018

Karen Slattery, Supervising Air Quality Specialist
Attainment, Toxics and Monitoring Section
Rhode Island Department of Environmental Management
Office of Air Resources
235 Promenade St.
Providence, RI 02908

Dear Ms. Slattery:

Thank you for the opportunity to review and comment on your proposed revision to the Rhode Island Department of Environmental Management's (DEM) Air Pollution Control Regulation (APCR) No. 34, Rhode Island Motor Vehicle Inspection and Maintenance (I/M) Program.

EPA Region 1 has reviewed Rhode Island's proposed regulatory amendments and has found that it is generally consistent with the federal I/M rule found at 40 CFR part 51 subpart S. However, these regulatory amendments to APCR No. 34 reflect changes to the Rhode Island I/M Program requirements and depict a shift to conducting Onboard Diagnostic (OBD) testing, and no longer require exhaust emissions "tailpipe" testing in Rhode Island.

Rhode Island DEM should submit the amended APCR No. 34 as a revision to the Rhode Island State Implementation Plan (SIP) along with the necessary I/M SIP narrative demonstrating that Rhode Island's OBD-testing-only I/M program meets the federal I/M rule and all relevant Clean Air Act requirements.

If you have any questions regarding this matter, please contact me at 617-918-1660.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ariel Garcia".

Ariel Garcia, Acting Manager
Air Quality Planning Unit

Enclosure

cc: Allison Archambault, RI DEM
Catherine Menke, RI DEM