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#08-674 (APCB) I/M Program - "Antique Vehicle"
Manda Clevenger: Mail Code 61-50
Rules Development Section/Office of Air Quality
Indiana Department of Environmental Management
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Indianapolis, Indiana 46204

The following are the comments and recommendations of the Specialty Equipment Market Association (SEMA) regarding the Indiana Department of Environmental Management's amendments to rules concerning the motor vehicle inspection and maintenance program in Lake and Porter Counties.

Representing the \$38 billion specialty automotive industry, SEMA is a trade association made up of approximately 7,500 mostly small businesses in Indiana and nationwide that manufacture, rebuild, distribute and retail parts and accessories for motor vehicles. The products produced by our companies include performance, functional, restoration and styling-enhancement products for use on passenger cars, trucks and special interest vehicles, like the ones targeted by this proposed regulation. Our market is the many Indiana motorists that collect, restore and drive motor vehicles. Indiana vehicle enthusiast groups and related businesses overwhelmingly oppose these amendments.

Under the amendments, the Department is proposing to redefine the term 'antique vehicle' in order to drive more of these hobby cars into the emissions inspection program. Under existing law, an antique vehicle is defined as "a motor vehicle or motor scooter that is at least 25-years old." Under the proposed regulation, the definition would be revised to require that the vehicle must be at least 25-years old, registered and plated as a historic motor vehicle, driven a maximum of 3,000 miles per calendar year, and include federally required pollution control equipment for that make and model year. Under the plan, the vehicle would be periodically forced into a vehicle emission test site to verify that these requirements have been met.

SEMA supports the goal of improved air quality and believes that further emission reductions from mobile sources are possible. We are convinced, however, that these amendments will not help achieve these reductions. In fact, we believe that the amendments will only serve to impose unnecessary social and economic burdens upon the citizens of the affected counties in Indiana and the inspection and maintenance staff in Lake and Porter Counties.

Various studies have found that only 10 to 20 percent of vehicles on the road contribute about 90 percent of the mobile source pollution. These same studies have identified vehicles of all model years as making up the problem cars. Even the U.S. Environmental Protection Agency has acknowledged that not all old cars are dirty cars and that many are quite clean. An analysis of California's Smog Check data shows that the dirtiest 10% of model year 1995 vehicles emitted at a higher level than did 50% of all 1974 vehicles tested. Clearly, there are many more 1995 vehicles on the road and they are being driven many more miles each year. When newer vehicles such as these begin to emit excessively, their relative emission contribution is far more than that of older vehicles.

Indiana's current emissions testing exemption recognizes the minimal impact of vehicles 25-years old and older on vehicle emissions and air quality. Vehicles 25-years old and older constitute a small portion of the overall vehicle population and are a poor source from which to look for emissions reduction. In fact, older vehicles of the type targeted by these amendments constitute less than one half of one percent of the total vehicle population in Indiana. Antique vehicles are overwhelmingly well-maintained and infrequently driven (about one-third the miles each year as a new vehicle). Generally, vehicles 25-years old and older are insured under policies that limit use – only 2,500 miles per year - and are required to be stored in a locked and enclosed garage. Most are used exclusively for car club activities, exhibitions, parades and other functions of public interest and are rarely driven at all during winter driving months.

Most states also exempt from emissions inspections cars that are four or less model-years old for similar reasons. It is senseless to test newer vehicles, the results of which demonstrate no significant air quality benefits. The idea behind exempting any class of vehicles is to reduce costs while not losing appreciable emission reductions. This strategy builds support for emission inspection programs, but also directs finite resources where they will do the most good for the most people and for the least cost.

We are convinced that these amendments would cause definite and unnecessary burden to Indiana citizens for no verifiable emissions reduction benefit. Accordingly, we recommend a withdrawal of these amendments and retention of the current emissions test exemption as currently constituted.

Thank you for your consideration.

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