



A Schnitzer Company

## Jan Daniels

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Jan Daniels  
Pick-N-Pull  
Auto Dismantlers

we offer comment on the following sections:

Section 44125 (a)(10) Smog requirement  
The additional cost of a smog check is a possible deterrent to low income consumers to participate.

Section 44125 (d) item 2 -  
"auto dealers and used car dealers to accept cars for retirement".

This is problematic as demonstrated by the many issues that happened in the Federal "Cash For Clunkers" program. These problems were:

- Vehicles arriving at Dismantler with significant parts removed by dealer, including engine and emissions parts.
- improper draining and containment of fluids and gases by the dealer.
- Vehicles retired at dealers that were never turned over to a dismantler
- Vehicles turned in to a dealer that are still on the road.
- improper transfer of ownership and reporting to DMV.

We believe all vehicles should go directly to a contracted dismantler who knows the requirements and are under contract to perform and dismantle retired vehicles as required.

The dismantler could provide any replacement vouchers to the consumer at the time the vehicle is retired.

When cars go to the dealers there is no system in place to track these vehicles. This process would need to be developed by ARB or BAR to insure that all vehicles that are retired are also properly reported and dismantled.