

Andy Ginsburg
06-8-4

Subject: Comments on Proposed OBD II Revisions
From: GINSBURG Andy <GINSBURG.Andy@deq.state.or.us>
Date: Wed, 27 Sep 2006 16:23:43 -0700
To: Catherine Witherspoon <cwithers@arb.ca.gov>
CC: Chuck Shulock <cshulock@arb.ca.gov>

Hi Catherine.

Below are comments on the proposed OBD II revisions. I'm trying to submit these through the web site, but I couldn't find the correct rulemaking subject. I've got a call in to the Clerk of the Board, but in case we don't connect I would appreciate if you could submit these comments for the record.

Thanks.

Andy

To: California Air Resources Board

Subject: Comments on Proposed OBD II Revisions

The Oregon Department of Environmental Quality (ODEQ) appreciates the opportunity to comment on the proposed revisions to the On Board Diagnostics II (OBD II) being considered on September 28, 2006.

Oregon recently adopted California's vehicle emission standards as is permitted by the federal Clean Air Act. Under the provisions of Section 177 of the Act, Oregon is obliged to adopt regulations that are identical to California's standards. Therefore, the Board's action on this issue will not only affect California but Oregon and the nine other states that have adopted California's emission standards.

Specifically, Oregon supports OBD II regulations that will not create an artificial barrier to the certification of light and medium duty diesel engines. Without the proposed changes to the Board's regulations, the availability of these diesel engines could be restricted due to the technological limitations of OBD II detection equipment to monitor the functional performance of particulate emissions. Extending the deadline for the final particulate matter detection limits as proposed will provide time for improvements in the OBD II detection equipment while still providing the benefit of the emission standards.

Oregonians want their vehicles to be clean, but they also have a strong interest in being able to purchase the full range of vehicle types - including vehicles with diesel engines. In addition, the availability of diesel vehicles is an important means of reducing greenhouse gas emissions.

Once again ODEQ appreciates the opportunity to comment on the proposed revisions to the OBD II regulations.

Andrew Ginsburg

Andy Ginsburg

Air Quality Administrator

Oregon Department of Environmental Quality

ginsburg.andy@deq.state.or.us

503/229-5397