



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MA 02109-3912

December 21, 2018

OFFICE OF THE  
REGIONAL ADMINISTRATOR

Julie Moore, Secretary  
Vermont Agency of Natural Resources  
1 National Life Drive  
Davis 2  
Montpelier, VT 05620

Via email to [julie.moore@vermont.gov](mailto:julie.moore@vermont.gov) and U.S. Mail

Dear Ms. Moore:

Thank you for taking time to discuss with me the progress Vermont has made developing its Automated Vehicle Inspection Program (AVIP). I understand Vermont has begun testing newer vehicles' sophisticated electronic emissions control systems and has established an electronic database to archive results. The Agency anticipates Vermont moving forward with this full implementation of your AVIP and submitting the program to EPA as a revision to your State Implementation Plan (SIP), replacing the 1996 Inspection and Maintenance (I/M) SIP submittal.

The I/M SIP was submitted by Vermont on July 1, 1996 and deemed administratively complete on July 24, 1996. As a result, sanctions imposed on Vermont for failure to submit an I/M SIP by the appropriate deadline under the 1990 Clean Air Act Amendments were lifted. However, due to numerous deficiencies, the 1996 Vermont I/M SIP was not approved pursuant to the Clean Air Act and EPA's I/M regulations and remains the Region's oldest backlogged SIP. Moreover, as disapproval of the deficient SIP would result in re-imposed sanctions, the Agency has not acted on this package, but instead consistently recommended Vermont DEC modify its I/M program and submit an updated SIP. Full implementation of VT's AVIP would ultimately allow Vermont to secure the necessary approval under the Clean Air Act and permanently lift the threat of sanctions.

To this end, EPA Region 1 proposes a meeting with the Vermont Agency of Natural Resources and the Vermont Agency of Transportation Department of Motor Vehicles in early 2019 to discuss implementing an acceptable vehicle I/M program that EPA can approve into your SIP. EPA believes Vermont has several flexibilities when implementing its program, including those pertaining to waiver types and waiver rates.

My staff will reach out to schedule this meeting. If you or your staff have any questions on this matter, please contact Ken Moraff at 617-918-1502.

Sincerely,

A handwritten signature in blue ink that reads "Alexandra Dapolito Dunn".

Alexandra Dapolito Dunn  
Regional Administrator

cc: Ken Moraff, EPA Region 1  
Emily Boedecker, Commissioner, VT DEC  
Megan O'Toole, Associate General Counsel, VT DEC  
Wanda Minoli, Interim Commissioner, VT DMV