

## VEHICLE EMISSION TESTING

The conservation community is extremely concerned about proposals to bar county health departments from continuing to implement vehicle emission testing as part of their State Implementation Plans to meet National Ambient Air Quality Standards (NAAQS) under the Clean Air Act. Vehicle emission testing has been largely responsible for bringing Tennessee counties into attainment with NAAQS standards and we believe that emission testing should continue to be an available tool for local health departments to maintain attainment status.

Tailpipe emissions are responsible for over 55% of nitrogen oxides (NOx), nearly 10% of volatile organic compounds (VOCs) and nearly 10% of particulate matter (PM) emissions. NOx and VOCs react to create ozone (smog) that greatly exacerbates pulmonary conditions. These emissions are largely responsible for Memphis, Knoxville and Chattanooga landing on the top ten list of Asthma Capitals in the US, and Nashville in the top 30.

If counties were no longer allowed to operate emission testing programs, they would have to demonstrate that they were reducing tens, if not hundreds of tons of VOC reductions from other sources, potentially limiting recruitment of new industries and jobs. When Memphis stopped requiring emission testing in 2013, the Shelby County Health Department was required to identify and reduce 70 tons of VOC emissions from other sectors to maintain Clean Air Act compliance.

### **We oppose [SB 2656](#) by Watson, Gardenhire (HB 1782) by Carter**

SB2656/HB1782 would ban counties that have achieved attainment status from entering into or renewing contracts regarding vehicle inspection and maintenance programs to maintain compliance with national ambient air quality standards.

While proponents of ending emission testing claim that it is working class and low income communities that incur the greatest costs associated with testing and subsequent vehicle repairs, they are also disproportionately impacted by the healthcare costs associated with dirty air.

We recognize that newer model cars pose less of an air pollution threat and note that legislation was passed in 2016, [Public Chapter Number 1028](#), that exempted cars that are three years old or newer from testing. However, we believe that that older cars should continue to be tested to insure continued attainment with NAAQS standards, particularly in high growth areas like Davidson and Hamilton counties.

### **We support [SB 2532](#) by Ketron (HB 2548) by Dawn White**

We recognize that less frequent testing as proposed by SB2532/HB2548, which would extend, from one to two years, the time period in which vehicles must be tested is a reasonable solution to inconveniences suffered by vehicle owners.

At the very least, county health departments responsible for maintaining NAAQS attainment should be consulted regarding the impacts that removing vehicle emission testing would have on their ability to protect our citizens from the health impacts of dirty air.