



REGIONAL AIR POLLUTION CONTROL AGENCY
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October 29, 2009

Mike Riggleman
Ohio Environmental Protection Agency, DAPC
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

Re: Request for Comment on Ohio's anti-tampering rules

Dear Mr. Riggleman:

The Regional Air Pollution Control Agency (RAPCA) supports Ohio EPA's proposal to change the definition of "vehicle" to "motor vehicle" in OAC Rule 3745-80 to remain consistent with the definition found in ORC 3704.16. The previous definition of "vehicle" excluded police, fire and voluntary fire vehicles from the anti-tampering rule. By changing this definition, police departments, municipal fire departments and volunteer fire department fleets will not be exempt from the anti-tampering rule.

On-road mobile sources are responsible for more than half of the total NO_x emissions in RAPCA's jurisdiction and more than a third of the total VOC emissions. A well maintained vehicle that is kept in its original configuration emits a small amount of pollution compared to a tampered vehicle which can emit over 100 times that amount. The anti-tampering rule is an important tool in our efforts to assure the vehicle population is operating properly and protect the public. RAPCA appreciates Ohio EPA's efforts to keep the anti-tampering rule current and effective.

Sincerely,

John A. Paul
Administrator