

Attachment D: Quality Control Report

January 1, 2008 through September 30, 2008

40 CFR section 51.366(c)

**Massachusetts Enhanced Emissions and Safety Test
Inspection and Maintenance Program**

**Attachment D: 2008 Quality Control Report
TABLE OF CONTENTS**

| | | |
|------------|---|-----------|
| 1.0 | MASSEDP EQUIPMENT AUDIT PROCEDURES | 1 |
| 2.0 | MASSEDP 2008 EQUIPMENT AUDIT RESULTS | 3 |
| 2.1 | NUMBER OF STATIONS, WORKSTATIONS AND EQUIPMENT AUDITS..... | 3 |
| 2.2 | EQUIPMENT AUDIT RESULTS | 4 |
| 3.0 | COMPARISON OF MASSEDP 2008 RESULTS TO PRIOR YEARS' RESULTS | 6 |
| 4.0 | MASSEDP AUDIT DETAILS | 8 |
| 4.1 | VISUAL INSPECTION..... | 8 |
| 4.2 | GAS ANALYZER VISUAL INSPECTION | 8 |
| 4.3 | WEATHER STATION AUDIT | 9 |
| 4.4 | LEAK CHECK..... | 9 |
| 4.5 | RAW TRANSPORT TIME CHECK..... | 10 |
| 4.6 | GAS BENCH AUDIT | 11 |
| 4.7 | GAS CAP TESTER | 12 |
| 4.8 | INDUCTIVE RPM PICKUP..... | 13 |
| 4.9 | OBDII RPM AUDIT | 13 |
| 4.10 | OBDII TESTER AUDIT..... | 14 |
| 4.11 | VMAS VISUAL INSPECTION..... | 15 |
| 4.12 | VMAS DILUTE O2 SENSOR | 15 |
| 4.13 | VMAS FLOW..... | 16 |
| 4.14 | FUNCTIONAL DYNAMOMETER CHECK | 16 |
| 4.15 | STATIONS SHUT DOWN AS A RESULT OF EQUIPMENT AUDITS..... | 16 |
| 4.16 | INVESTIGATION OF AUDIT ANOMALIES | 17 |
| 4.17 | OVERALL AUDIT RESULTS..... | 17 |
| 4.18 | OVERALL AUDIT RESULTS BY STATION..... | 18 |
| 5.0 | APPLUS EQUIPMENT AUDIT RESULTS | 19 |

1.0 MassDEP Equipment Audit Procedures

MassDEP developed its equipment audit procedures based on recommendations from its consultant, Sierra Research (Sierra) of Sacramento, CA and audit contractor, SGS TESTCOM, Inc. (TESTCOM) of Ballston Spa, NY. Sierra developed general equipment audit guidelines for EPA for ASM-type equipment used in transient test I&M programs ¹. MassDEP's audit procedures are consistent with EPA's guidance and include many other checks that are unique to the Massachusetts I&M Program. These additional checks are noted in section 4.0.

MassDEP's equipment audit procedure includes the following parts:

| | |
|----------------------------|--|
| Visual Inspection | Visual check that all relevant equipment is connected, powered, and ready to perform an inspection. Check for visual signs of tampering. |
| Gas Analyzer Visual | Visual check of the gas analyzer including the condition of raw sample system (probe, hose, and filters), on-board calibration gases, and zero air generator. |
| Weather Station | Accuracy checks of the workstation temperature, relative humidity, and barometric pressure readings. |
| Leak Check | Functional check for leaks in the raw sample system and the analyzer's ability to detect leaks during its 24-hour calibration. |
| Gas Bench | Accuracy check of the gas bench HC, CO, CO ₂ , NO _x , and O ₂ readings using various audit gas concentrations. |
| Gas Cap Tester | Functional check of the gas cap tester's ability to distinguish between passing and failing gas caps |
| RPM pickups | Functional and accuracy check of the inductive and OBDII RPM pickups at 700 and 2,500 RPM. |
| OBDII Scanner | Visual check of the OBDII cable condition. Functional check of the scanner's ability to communicate with OBDII systems. Accuracy check of the scanner's ability to retrieve specific diagnostic trouble codes (DTCs) and readiness monitor status. |
| VMAS Visual | Visual check for proper installation of VMAS and condition of hoses. |
| VMAS O ₂ Sensor | Accuracy check of the VMAS O ₂ sensor using three audit gas concentrations. |
| VMAS Flow | Accuracy check of VMAS flow measurement at three flow rates. |

¹ "U.S. EPA Steady State and Transient Testing Equipment Audit Guidance," July 2001

To focus quality control efforts, in 2004 MassDEP defined “Critical Audit Failures” as malfunctions that may substantially affect test accuracy. Components of these Critical Audit Failures include the gas bench, VMAS, gas cap tester, OBDII tester, and barometric pressure. Critical failures are defined as:

- A critical gas bench audit failure occurs when the bench fails its first bench audit, is re-calibrated and then fails a second bench audit that is conducted immediately after the calibration.
- The critical VMAS failures include failures of either the VMAS flow audit or the 15% dilute O2 audit.
- The combined critical gas bench/VMAS failure is the result of either a critical gas bench or critical VMAS failure.
- The OBDII Test System critical failure occurs when the OBDII test system fails its audit for communication, readiness codes, or diagnostic trouble codes.
- A gas cap tester critical failure occurs when the gas cap tester fails the first audit, is re-calibrated and then fails a second gas cap tester audit that is conducted immediately after calibration.
- If the barometric pressure has an error of greater than 10%, it is a critical failure.

2.0 MassDEP 2008 Equipment Audit Results

This report covers the period from January 1, 2008 through September 30, 2008, in which Massachusetts continued to implement the I&M program that started operation on October 1, 1999. On October 1, 2008, vehicle inspections began under a new contract, which is implementing a new program that is significantly different from the program operated between October 1, 1999 and September 30, 2008 (The new program is described in Part 2 of the Massachusetts 2008 Annual Report). Most notably from the perspective of equipment audits, the new program uses only OBD emissions testing for all gasoline fueled vehicles made since model year 1996, and for light- and medium-duty diesel vehicles which are equipped with OBD systems, and will continue to use a snap opacity test for smoke from heavy-duty diesel vehicles. Therefore, audits of the gas bench and VMAS-related items are not relevant to the new program.

This report covers the equipment audits conducted from January through September of 2008. Please note that, as part of the program transition, stations did not conduct initial TSI or transient tests in August and September 2008, to allow for re-testing of vehicles that failed within the 60-day period allotted. In September 2008, MassDEP conducted audits of only OBD emissions testing equipment.

2.1 Number of Stations, Workstations and Equipment Audits

40 CFR 51.366 (c) Quality control report. ...Basic statistics on the quality control program for January through December of the previous year, including:

- (1) The number of emission testing sites and lanes in use in the program;
- (2) The number of equipment audits by station and lane; . . .

Between January 1, 2008 and September 30, 2008, 1,397 stations and 1,442 workstations (lanes) conducted emissions inspections throughout the period. A total of 1,642 stations and 1,633 workstations conducted emissions tests at some time during the year. This includes workstations and stations that conducted only diesel emissions tests and were therefore not subject to equipment audits.

MassDEP performed a total of 1,604 audits in between January 1, 2008 and September 30, 2008, which covered 1, 1,212 different workstations (lanes) and 1,187 different inspection stations. 875 workstations were audited one time, 292 workstations were audited two times, 37 workstations were audited three times, 6 workstations were audited four times and 2 workstations were audited five times. These audits include re-audits at stations that failed items deemed "critical" during initial or follow-up audits. Mass DEP randomly selected workstations to receive audits. Therefore, some workstations were not scheduled for audits in the first nine months of 2008.

See Section 5 for the results of the 5,012 equipment audits conducted in 2008 by Applus.

2.2 Equipment Audit Results

Table 1 presents a breakdown of the results of audits conducted between January 1, 2008 and September 30, 2008, including individual audit parts and overall results. Although a total of 1,604 audits were performed, the number of audit parts tested (table column "Tested") was usually less than 1,604 because not all audits included all audit parts. For some audits, audit parts were excluded because the workstation configuration did not include some parts, such as the VMAS. Re-audits typically only re-tested the parts that failed the initial audit. In other instances, a particular part could not always be audited. For example, if a workstation failed its leak check, even when using a replacement sample hose and probe, the audit of the gas bench could not proceed. When the audit could not be completed for all audit parts, the auditors returned to the station to audit these parts at a later date.

The sum of the failure rates for the individual audit parts can be greater than 100%, because a single audit may fail more than one audit part.

Table 1: Equipment Audit Results Summary

| Audit Part | Audit Results 1/1/08 through 9/30/08 | | | |
|--|---|------|--------|--------------|
| | Pass | Fail | Tested | Failure Rate |
| Visual Inspection | 1,581 | 23 | 1,604 | 1.4% |
| Gas Analyzer Visual Inspection | 1,106 | 46 | 1,152 | 4.0% |
| Weather Station | 870 | 229 | 1,099 | 20.8% |
| Leak Check | 1,121 | 20 | 1,141 | 1.8% |
| 1 st Gas Bench Audit | 1,079 | 25 | 1,104 | 2.3% |
| 2 nd Gas Bench Audit | 3 | 19 | 22 | 86.4% |
| Gas Cap Tester | 1,099 | 1 | 1,100 | 0.1% |
| Inductive RPM Pickup | 1,081 | 10 | 1,091 | 0.9% |
| OBDII RPM Pickup | 1,446 | 2 | 1,448 | 0.1% |
| OBDII Tester | 1,517 | 0 | 1,517 | 0.0% |
| VMAS Visual Inspection | 1,060 | 6 | 1,066 | 0.6% |
| VMAS Dilute O2 Sensor ² | 1,058 | 21 | 1,079 | 1.9% |
| VMAS Dilute O2 15% | 1,074 | 5 | 1,079 | 0.5% |
| VMAS Dilute O2 8% | 1,059 | 20 | 1,079 | 1.9% |
| VMAS SAO Flow | 1,066 | 2 | 1,068 | 0.2% |
| Overall Audit Result³ | 1,281 | 323 | 1,604 | 20.1% |
| Combined Gas Bench + VMAS⁴ | 1107 | 47 | 1154 | 4.1% |
| Critical Audit Failures | | | | |
| Combined Critical Gas Bench/ VMAS | 1,128 | 26 | 1,154 | 2.3% |
| Gas Cap Tester | 1,099 | 1 | 1,100 | 0.1% |
| Barometric Pressure | 1,099 | 0 | 1,099 | 0.0% |
| OBDII Test System | 1,517 | 0 | 1,517 | 0.0% |

² VMAS Dilute O2 Sensor is a comprehensive result of three audit checks for the accuracy of the VMAS O2 sensor. This check uses three audit gases to determine overall O2 sensor accuracy including 8% O2, 15% O2, and 20.8% O2 (zero air). All three checks must result in “P/F” for VMAS Dilute O2 Sensor to be “tested”. For instance, if an audit check for the 8% O2 is “NA”, but passes the 15% O2 and 20.8% O2, then the VMAS Dilute O2 Sensor is not tested. For this reason it is possible to have more audits of VMAS Dilute O2 15% than there are audits for the overall “VMAS Dilute O2 Sensor.”

³ To pass the overall audit, the workstation cannot fail any individual audit part.

⁴ Combined results from 1st Gas Bench, VMAS Dilute O2, and VMAS Flow audits for each workstation audited.

3.0 Comparison of MassDEP 2008 Results to Prior Years' Results

Table 2 summarizes the results of equipment audits conducted by MassDEP from 2003 through September 30, 2009. Of particular interest is the significant improvement from the 2004 13% failure rate for “combined critical gas bench/VMAS audit” items to a 2% failure rate in between January 1, 2008 and September 30, 2008.

This table also demonstrates that the dramatic improvement in the overall audit failure rate (following the June 2004 program changes) continued in 2008. Between January 1, 2008 and September 30, 2008, 20% (323 of 1,604) of equipment audits failed one or more of the 88 audit criteria described in Section 4. This represents continual improvement over the 83% failure rate in 2003, 55% failure rate in 2004, 39% failure rate in 2005, the 31% failure rate in 2006 and the 30% failure rate in 2007.

**Table 2:
MassDEP Equipment Audit Data Summary
January 1, 2003 through Sept 30, 2008**

| Audit Part | 2003 Failure Rate | 2004 Failure Rate | 2005 Failure Rate | 2006 Failure Rate | 2007 Failure Rate | 2008 Failure Rate |
|---|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| Visual Inspection | 7% | 6% | 4% | 4% | 3% | 1% |
| Gas Analyzer Visual Inspection | 34% | 11% | 17% | 8% | 4% | 4% |
| Weather Station | 47% | 27% | 21% | 17% | 20% | 21% |
| Leak Check | 44% | 7% | 1% | 1% | <1% | 2% |
| 1 st Gas Bench Audit | 22% | 12% | 4% | 6% | 4% | 2% |
| 2 nd Gas Bench Audit ⁵ | 76% | 73% | 80% | 83% | 87% | 86% |
| Gas Cap Tester | 17% | 7% | 2% | <1% | <1% | <1% |
| Inductive RPM Pickup | 2% | 3% | 1% | <1% | 1% | <1% |
| OBDII RPM Pickup | 1% | 1% | <1% ⁶ | <1% | <1% | <1% |
| OBDII Tester | 5% | 1% | <1% | 0% | <1% | 0% |
| VMAS Visual Inspection | 20% | 4% | 2% | 2% | 2% | <1% |
| VMAS Dilute O2 Sensor | 31% | 27% | 8% | 3% | 3% | 2% |
| VMAS SAO Flow | 11% | 4% | 2% | <1% | <1% | <1% |
| Overall Audit Result | 83% | 55% | 39% | 31% | 30% | 20% |
| Combined Gas Bench and VMAS | 38% | 32% | 12% | 8% | 7% | 4% |
| Combined Critical Gas Bench/VMAS Audit Items | NA | 13% | 5% | 5% | 4% | 2% |

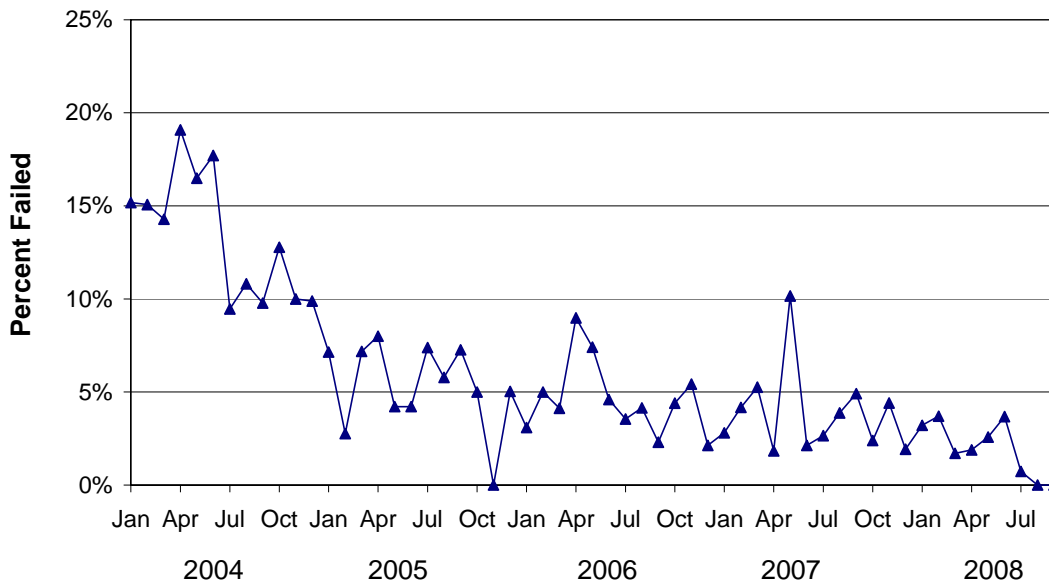
⁵ Because the 2nd gas bench audit is conducted only after an initial bench audit failure and a successful calibration, a relatively small number of workstations receive a second bench audit (132 in 2003, 99 in 2004, 59 in 2005, 98 in 2006, 70 in 2007, and 22 between January 2008 and September 2008).

⁶ Beginning in 2005, audit failures less than 1% are indicated as “<1%”.

As can be seen in Table 2, above, with the exception of the weather station and the leak check audits, the failure rate between January 1 and September 30, 2008 for each audit part was either lower or equal to the 2007 failure rate, or was 1% or less. Though the weather station audit failure rate increased from 20% to 21% in this period, these failures are generally due to issues with inspection station maintenance; the failure rate for this item continues to maintain the substantial improvement over the 47% failure rate in 2003. Similarly, though the leak check failure rates increased from <1% in 2007 to 2% between January 1, 2008 and September 30, 2008, the failure rate for this station-maintenance item continues to maintain the substantial improvement over the 44% failure rate in 2003.

Of the workstation components, gas bench and VMAS accuracy have proven to be the most difficult to maintain, and are therefore monitored more closely. The following graph presents the Critical Audit Failure rate for combined gas bench/VMAS failures for January 1, 2004 through September 30, 2008. The graph highlights a significant improvement in failure rates for combined critical components during the last half of the 2004, with sustained improvements through September 2008.

Combined Critical Gas Bench/VMAS Audit Failure Rate by Month
 - Includes Initial Audits and Re-Audits -



As can be seen in the above graph, the combined critical gas bench and VMAS failure rate between January 1, 2008 and September 30, 2008 sustained the improvements seen in prior years.

4.0 MassDEP Audit Details

4.1 Visual Inspection

The visual inspection checks the type of workstation being audited (e.g. whether it is equipped with a dynamometer or has a diesel opacity meter) and includes the following items:

| MassDEP Visual Inspection Audit Items | Part of EPA's Audit Guidance? |
|--|--------------------------------------|
| Signs of tampering | √ |
| Barcode scanner is operational | |
| Gas cap tester is connected and calibration device NOT attached | √ |
| Dynamometer (if equipped) is connected to workstation and powered | √ |
| Vehicle cooling fan is accessible and functional | |
| VMAS is connected to workstation and powered | √ |
| Workstation is connected to a dedicated phone line | |
| Workstation clock shows proper time and date (within 5 minutes) | |
| Diesel Opacity meter (if equipped) is connected to workstation and powered | |

Between January 1, 2008 and September 30, 2008, 23 of 1,604 workstation audits (1.4%) failed one or more of the visual inspection items.

4.2 Gas Analyzer Visual Inspection

The gas analyzer visual inspection checks the condition of the gas analyzer portion of the workstation and its ancillary equipment and contains the following items:

| MassDEP Gas Analyzer Visual Inspection Audit Items | Part of EPA's Audit Guidance? |
|---|--------------------------------------|
| There are no non-stock components in the sample system hose assembly | None |
| Auxiliary sample hose and probe are available for testing dual exhaust vehicles | |
| Inlet filter housing and elements are present and appear functional | |
| On-board calibration gas cylinders have an official BAR-97 label and bar code | |
| Calibration gas cylinder concentrations match those stored on the analyzer | |
| Workstation is equipped with a zero air generator (ZAG) | |
| ZAG is connected to workstation and powered | |
| ZAG inlet filter and filter element are present | |

Between January 1, 2008 and September 30, 2008, 23 of 1,152 workstation audits (4.0%) failed one or more of the gas analyzer visual inspection items.

4.3 Weather Station Audit

The weather station audit checks the accuracy of the workstation's weather station against a NIST-traceable calibrated portable audit weather station. The weather station audit contains the following items and specifications:

| MassDEP Weather Station Audit Items | MassDEP Pass/Fail Tolerance | Part of EPA's Audit Guidance? |
|-------------------------------------|---|-------------------------------|
| Barometric Pressure, in Hg | ± 3% of reading and ± 0.1 in Hg absolute | √ |
| Temperature, deg F | ± 4.5 deg F, absolute | √ |
| Relative Humidity, % | ±8.5 % absolute | √ |

Between January 1, 2008 and September 30, 2008, 229 of 1,099 workstation audits (20.8%) failed one or more of the weather station audit items. If the barometric pressure has an error of greater than 10%, it is considered a Critical Audit Failure. Between January 1, 2008 and September 30, 2008, there were no Critical Audit Failures for barometric pressure.

4.4 Leak Check

The workstation requires the inspector to perform a leak check of its raw exhaust sample system as part of its 24-hour calibration procedure. This sample system consists of external components such as a probe tip (that is inserted into the tailpipe), probe tip handle (that the sample flows through), rubber hose, particle filter, and internal components such as the sample pump, solenoid valves, and assorted plumbing leading up to the gas bench. It is the station's responsibility to maintain the external sample system components so that they do not have any leaks.

The MassDEP leak check audit contains two checks for determining the condition of the raw exhaust sample system and verifying the ability of the MASS99 system to self-detect leaks:

| MassDEP Leak Check Audit Items | Part of EPA's Audit Guidance? |
|--------------------------------------|-------------------------------|
| Leak check fails with probe uncapped | √ |
| Leak check passes with probe capped | √ |

If the workstation cannot pass its leak check with the probe capped, the auditor attempts to make repairs to obvious problems with the sample system (such as tightening a loose fitting) and repeats the check. If the workstation cannot pass its leak check with the probe capped, the auditor replaces the probe tip, handle, and/or hose as needed to fix the problem and repeats the check. If

the workstation does not fail the leak check with the probe uncapped or pass the leak check with the probe capped following repairs or parts replacement, a gas bench audit is not performed. In these cases, the results are reported immediately to MassDEP personnel and a priority service visit is arranged for the workstation. When repairs have been confirmed, the auditors return to the station to complete an audit of any skipped audit parts.

Between January 1, 2008 and September 30, 2008 20 of 1,141 workstation audits (1.8%) failed either the leak check capped or uncapped test. Although the leak check failure rate increased from 0.7% in 2007 to 1.8% between January 1, 2008 and September 30, 2008, the failure rate for this station-maintenance item continues to maintain the substantial improvement over the 44% failure rate in 2003 and the 7% failure rate in 2004.

4.5 Raw Transport Time Check

The raw transport time check was not performed during the period covered by this report. Prior to 2005, only one of the equipment vendors, ESP, required a raw transport time check to be performed as part of the 72-hour calibration routine performed by the inspector. The other vendor, SPX, automatically determines the raw transport time for its sample system that cannot be changed by the inspector. Due to the replacement of all ESP workstations (which Applus reported to be complete by February 28, 2005), no raw transport time audits were conducted after 2004.

4.6 Gas Bench Audit

The gas bench audit uses six different audit gas blends to check the ability of the workstation to accurately measure the range of hydrocarbons (HC), carbon monoxide (CO), carbon dioxide (CO₂), oxides of nitrogen (NO_x), and oxygen (O₂) that may be present during an emissions test. The gas bench audit has the following specifications:

| Audit Gas Blend | Component | Target Concentration | MassDEP audit tolerance- 1 st gas bench audit ⁷ | MassDEP audit tolerance- 2 nd gas bench audit | Part of EPA's Audit Guidance? |
|-----------------|---------------------|----------------------|---|--|-------------------------------|
| Zero Air | HC, ppm | 0 | ± 9 ppm absolute | ± 9 ppm absolute | √ |
| | CO, % | 0 | ± 0.04% absolute | ± 0.02% absolute | √ |
| | CO ₂ , % | 0 | ± 0.6% absolute | ± 0.3% absolute | √ |
| | NO, ppm | 0 | ± 26 ppm absolute | ± 26 ppm absolute | √ |
| | O ₂ , % | 20.9 | ± 10% of bottle | ± 6% of bottle | √ |
| 1% oxygen | O ₂ , % | 1.0% | ± 0.2% absolute | ± 0.1% absolute and ± 1% of bottle | √ |
| BAR-97 Low | HC, ppm | 200 | ± 6% of bottle | ± 8 ppm absolute and ± 1% of bottle | √ |
| | CO, % | 0.50% | ± 6% of bottle | ± 0.02% absolute and ± 1% of bottle | √ |
| | CO ₂ , % | 6.0% | ± 0.36% absolute | ± 0.3% absolute and ± 1% of bottle | √ |
| | NO, ppm | 300 | ± 28 ppm absolute | ±25 ppm absolute and ± 1% of bottle | √ |
| BAR-97 Mid 1 | HC, ppm | 960 | ± 6% of bottle | ± 4% of bottle | √ |
| | CO, % | 2.4% | ± 6% of bottle | ± 4% of bottle | √ |
| | CO ₂ , % | 3.6% | ± 0.34% absolute | ± 0.3% abs and ± 1% of bottle | √ |
| | NO, ppm | 900 | ± 8% of bottle | ± 5% of bottle | √ |
| BAR-97 Mid 2 | HC, ppm | 1920 | ± 6% of bottle | ± 4% of bottle | √ |
| | CO, % | 4.8% | ± 6% of bottle | ± 4% of bottle | √ |
| | CO ₂ , % | 7.2% | ± 6% of bottle | ± 0.3% abs and ± 1% of bottle | √ |
| | NO, ppm | 1800 | ± 8% of bottle | ± 5% of bottle | √ |
| BAR-97 High | HC, ppm | 3200 | ± 6% of bottle | ± 4% of bottle | √ |
| | CO, % | 8.0% | ± 6% of bottle | ± 4% of bottle | √ |
| | CO ₂ , % | 12.0% | ± 6% of bottle | ± 4% of bottle | √ |
| | NO, ppm | 3000 | ± 8% of bottle | ± 5% of bottle | √ |

⁷ “Of bottle” for the audit tolerance indicates a percentage of the relevant audit gas bottle concentration.

If the workstation fails to read any one of the audit gases within the specified tolerances in the first gas bench audit, the auditor calibrates the workstation and conducts the gas bench audit a second time.

Between January 1, 2008 and September 30, 2008, 25 of 1,104 workstation audits (2.3%) failed to read one or more of the audit gases within the specified tolerances during the first gas bench audit. This is a decrease in failure rate from 2007 (4.2%), 2006 (5.6%), and 2005 (3.8%), and maintains the significant improvement from 2004 when 11.7% failed one or more of the gases during the first gas bench audit. In 2003, 21.5% failed the first bench audit.

Between January 1, 2008 and September 30, 2008, 19 of 22 workstation audits (86.4%) failed the first gas bench audit and then failed the second gas bench audit following calibration⁸. These failures constitute 73% of all critical combined gas bench and VMAS audit failures between January 1, 2008 and September 30, 2008 (there were 26 in total), and 1.6% of all critical combined gas bench and VMAS audits (there were 1,154 in total).

While failure rates between January 1, 2008 and September 30, 2008 for second gas bench audits appear to be high, consider that the number of gas benches that failed their first audit and were recalibrated⁹ has decreased significantly since 2003 so that the small number of failed second gas bench audits is a large percentage of the number of first gas bench audit failures. In addition, the high percentage of second gas bench audit failures indicates that these audits are successfully identifying gas benches that experienced a substantive failure after their last audit, and also indicates that the contractor's improved maintenance generally takes care of small problems before they become audit failures, so that these audits are no longer identifying gas benches that have minor problems that are temporarily resolved by a calibration.

4.7 Gas Cap Tester

The gas cap tester audit consists of checks that the station has all of the necessary gas cap adapters and a gas cap calibration device, and checks the workstation's ability to distinguish between passing and failing gas caps. The gas cap tester audit contains the following items:

| MassDEP Gas Cap Tester Audit Items | Part of EPA's Audit Guidance? |
|---|--------------------------------------|
| All gas cap adapters are available | √ |
| Calibration device/caps are available | √ |
| Audit "Pass" cap passes test | √ |
| Audit "Fail" cap fails test | √ |

⁸ Since the Workstations are calibrated frequently during normal operation, the majority of Workstations that failed the first bench audit also fail the second bench audit that is conducted after a calibration. The 19 audits that failed the second bench audits are 1.7% of all 1,104 bench audits and 86.4% of the second bench audits.

⁹ Some workstations could not pass the gas bench calibration after failing the first gas bench audit and were automatically locked out from further testing. These workstations did not receive a second gas bench audit.

MassDEP uses two audit gas caps (one set to pass, the other set to fail) to audit the gas cap tester. If the workstation does not produce the correct result for either of the audit gas caps, then it fails the gas cap tester audit and the audit is repeated. If the audit fails either of the gas cap retests, then the audit is repeated using the station's calibration device. These additional steps allow the gas cap audit to verify the initial results and determine if the station's calibration device was faulty.

Between January 1, 2008 and September 30, 2008, one of 1,100 workstation audits (0.1%) failed one or more of the items in the gas cap tester audit. This was a slight improvement over the 2007 failure rate (0.9%). The continued improvement in this failure rate starting in 2005 over the 6.5% failure rate for 2004 is mainly due to replacing the gas cap testing equipment that was provided by one of the equipment vendors. The one gas cap tester failure was considered a critical failure (0.1 % critical failure rate for gas cap audits).

4.8 Inductive RPM Pickup

MassDEP uses an RPM signal generator to check the accuracy of the inductive RPM pickup that clamps around the sparkplug wire, at 700 and 2,500 RPM. The inductive RPM pickup audit contains the following items:

| MassDEP Inductive RPM pickup Audit Items | MassDEP Pass/Fail Tolerance | Part of EPA's Audit Guidance? |
|--|-----------------------------|-------------------------------|
| RPM pickup is in good condition and connected to the workstation | | |
| Low Idle @ 700 RPM | ± 3.3% of reading | √ |
| High Idle @ 2,500 RPM | ± 3.3% of reading | √ |

Between January 1, 2008 and September 30, 2008, 10 of 1,091 workstation audits (0.9%) failed one or more of the items in the inductive RPM pickup audit. One of the 10 failures were due to the Inductive RPM probe not being connected to the workstation, rather than due to the probe malfunctioning.

4.9 OBDII RPM Audit

The Massachusetts I&M Program uses the OBDII tester to record RPM from 1996 and newer OBDII equipped vehicles if they receive a Two-Speed-Idle test. MassDEP uses an OBDII simulator to generate a data stream to check the accuracy of the OBDII scanner at 700 and 2,500 RPM. The OBDII RPM audit contains the following items:

| MassDEP OBDII RPM Audit Items | MassDEP Pass/Fail Tolerance | Part of EPA's Audit Guidance? |
|--|-----------------------------|-------------------------------|
| OBDII cable and connector are in good condition and connected to the workstation | | √ |
| Low Idle @ 700 RPM | ± 10% of reading | √ |
| High Idle @ 2,500 RPM | ± 10% of reading | √ |

Between January 1, 2008 and September 30, 2008, two of 1,448 workstation audits (0.1%) failed one or more of the items in the OBDII RPM audit. Both failures in this period were due to problems with the cable.

4.10 OBDII Tester Audit

The OBDII Tester audit contains: 1) a check that the OBDII tester can communicate with a vehicle's OBDII system and 2) an accuracy check to verify that the OBDII tester correctly reads the malfunction indicator light (MIL) status, diagnostic trouble codes (DTCs), and the status of all readiness monitors. MassDEP uses an OBDII simulator to generate signals for MIL status, DTCs and readiness monitor status that simulate the output of a vehicle's OBDII system. The OBDII tester audit consists of the following items:

| MassDEP OBDII Tester Audit Items | Part of EPA's Audit Guidance? |
|---|-------------------------------|
| Workstation communicates with OBDII simulator | √ |
| MIL status | √ |
| Misfire monitor status | √ |
| Fuel System monitor status | √ |
| Component monitor status | √ |
| Catalyst monitor status | √ |
| Heated Catalyst monitor status | √ |
| Evaporative System monitor status | √ |
| Secondary Air monitor status | √ |
| A/C System monitor status | √ |
| O2 Sensor monitor status | √ |
| O2 Sensor Heater monitor status | √ |
| EGR monitor status | √ |
| DTC 1 | √ |
| DTC 2 | √ |
| DTC 3 | √ |
| DTC 4 | √ |
| DTC 5 | √ |
| DTC 6 | √ |

Between January 1, 2008 and September 30, 2008, none of 1,517 workstation audits (0.0%) failed one or more of the items in the OBDII Tester audit. There were no critical failures for the OBDII test system.

4.11 VMAS Visual Inspection

The VMAS visual inspection checks the condition of the VMAS and its ancillary equipment and contains the following items:

| MassDEP VMAS Visual Inspection Audit Items | Part of EPA's Audit Guidance? |
|--|-------------------------------|
| VMAS blower is mounted correctly | None |
| Damage (cracks, leaks, loose fit) of the blower or VMAS tube | |
| Vortex strut missing or severely damaged | |
| Thermistor bent or severely damaged | |
| VMAS inlet hose is free from tears or leaks | |
| VMAS inlet hose has an exhaust cone attached | |
| VMAS inlet hose is between 5 and 20 feet long | |
| Auxiliary hose, cone, and clamps are available for testing dual-exhaust vehicles | |
| VMAS LEDs are blinking alternately each second (indicating no faults) | |

Between January 1, 2008 and September 30, 2008, 6 of 1,066 workstation audits (0.6%) failed one or more of the VMAS visual inspection items.

4.12 VMAS Dilute O2 Sensor

The VMAS dilute O2 sensor audit checks the accuracy of the VMAS O2 sensor using three audit gases: 8% O2, 15% O2, and 20.8% O2 (zero air) and has the following specifications:

| MassDEP VMAS Dilute O2 Sensor Audit Items | MassDEP Pass/Fail Tolerance | Part of EPA's Audit Guidance? |
|---|-------------------------------------|-------------------------------|
| 8% O2 audit gas | ± 5% of bottle and ± 3% of absolute | √ |
| 15% O2 audit gas | ± 5% of bottle and ± 3% of absolute | √ |
| 20.8% O2 (zero air) audit gas | ± 5% of bottle and ± 3% of absolute | |

Between January 1, 2008 and September 30, 2008, 21 of 1,079 workstation audits (2.3%) failed one or more of the VMAS dilute O2 sensor audit gases. However, only 5 of the 1,079 workstation audits for the 15% O2 audit gas (0.5%) failed this audit check, and were therefore critical audit

failures. These critical failures constituted 19.2% of the 26 critical combined bench and VMAS failures.

4.13 VMAS Flow

The VMAS flow audit checks the accuracy of the VMAS flow sensor at three points: minimum flow (~225 standard cubic feet per minute, or scfm), maximum flow (usually 400 to 450 scfm), and a mid-point in between. MassDEP uses a smooth approach orifice (SAO) as a flow standard that is compared with the VMAS flow measurement indicated by the workstation. The VMAS flow audit has the following specifications:

| MassDEP VMAS Flow Audit Items | MassDEP Pass/Fail Tolerance | Part of EPA's Audit Guidance? |
|----------------------------------|-----------------------------|-------------------------------|
| Maximum Flow (~ 400 to 450 scfm) | ± 10% of reading | √ |
| Mid Flow | ± 10% of reading | √ |
| Minimum Flow (~ 225 scfm) | ± 10% of reading | √ |

Between January 1, 2008 and September 30, 2008, two of 1,068 workstation audits (0.2%) failed one or more of the VMAS flow points. This maintains the significant improvements over the failure rate in 2003 (11.2%), 2004 (3.7%), 2005 (1.9%), 2006 (0.6%), and 2007 (0.3%). The two VMAS flow audit failures in the period covered by this report were categorized as critical combined bench and VMAS audit criteria and constituted 7.7% of all critical combined bench and VMAS audit failures (there were 26 in total), and were 0.2% of all critical combined bench and VMAS audits (there were 1,154 in total).

4.14 Functional Dynamometer Check

The workstation requires a dynamometer coast-down check to be performed as part of its 72-hour calibration procedure. If the coast-down check fails, the workstation automatically performs a test to determine the parasitic losses in the dynamometer roll system. If these parasitic losses are within manufacturer's specifications, then a second coast-down check is performed using the new parasitic loss values. If the parasitic loss values are not within manufacturer's specifications or the dynamometer fails its second coast-down check, then the dynamometer fails its calibration and the workstation is automatically locked out from testing. Because the MASS99 system has this extensive automated coast-down check and lockout mechanism, MassDEP's audit procedure does not specifically include performing a coast-down check for the workstation dynamometer.

4.15 Stations Shut Down as a Result of Equipment Audits

40 CFR 51.366 (c) Quality control report. ...Basic statistics on the quality control program for January through December of the previous year, including:

- (4) Number and percentage of stations and lanes shut down as a result of equipment audits.

Workstations were immediately shut down and suspended from performing inspections until repairs could be made on eight occasions between January 1, 2008 and September 30, 2008 as a result of equipment audits. This constituted 0.5% of the 1,604 audits. Each of these eight shutdowns occurred at a different station, affecting eight different workstations. This represents 0.7% of the 1,187 audited stations and 0.7% of the 1,212 audited workstations¹⁰. This was equivalent to 0.5% of all 1,642 stations and 0.5% of all 1,633 workstations that conducted emissions tests sometime between January 1, 2008 and September 3, 2008.

. One workstation was shut down because it failed the leak check. One workstation was shut down because zero air was not detected. There were six additional workstations that were shut down due to serious issues that prevented calibration of the gas bench.

4.16 Investigation of Audit Anomalies

As part of ongoing quality control of the equipment audits, MassDEP and Applus review the equipment audit results. Anomalous results lead to further investigation that may include a side-by-side testing with multiple Applus and MassDEP auditors and multiple sets of audit equipment. Between January 1, 2008 and September 30, 2008, investigations resulted in modification of the audit results for 2 MassDEP overt audit failures, as shown in Table 3.

Table 3: Modifications of Audit Results Due to Audit Anomalies

| # | Failure Type | Reason for Modification | Modification of Audit Data |
|---|--------------|---|---------------------------------------|
| 2 | Multiple | The standard values in these two audits were incorrect due to a synching error when switching audit vehicles. | Removed the audits from the analysis. |

4.17 Overall Audit Results

Overall between January 1, 2008 and September 30, 2008, 323 of the 1,604 workstation audits (20.1%) failed one or more of the 88 audit items described in previous sections. This represents a continuous improvement over the 82.5% failure rate for 2003, the 54.9% failure rate for 2004, the 39.2% failure rate for 2005, the 30.5% failure rate for 2006 and the 30.0% failure rate for 2007. Also between January 1, 2008 and September 30, 2008, 47 of 1,604 workstation audits (4.1%) failed the first gas bench audit, VMAS Dilute O2 sensor, or VMAS SAO Flow audits. This was an improvement over the 31.5% failure rate in 2004, the 11.9% failure rate for 2005, the 8.4% failure rate for 2006 and the 7.0% failure rate for 2007.

¹⁰ The number of workstations shut down during an audit includes audits where the auditor recorded “yes” for “workstation lockout.” The eight workstation lockouts may under-count the number of workstations that were prevented from completing further inspections. Workstation benches which did not pass a second gas bench recalibration attempt were most likely to have been locked out due to the failure to calibrate.

For combined critical gas bench/ VMAS audit items, 26 of 1,604 workstation audits (2.3%) failed at least one of the critical bench or VMAS audit items. This was an improvement over the 13.3% failure rate for 2004, the 5.4% failure rate for 2005, the 4.7% failure rate for 2006 and the 4.0% failure rate for 2007 for the critical bench or VMAS audit items.

4.18 Overall Audit Results by Station

40 CFR 51.366 (c) Quality control report. ...Basic statistics on the quality control program for January through December of the previous year, including: . . .

(3) The number and percentage of stations that have failed equipment audits; . . .

Of the 1,604 equipment audits conducted, 323 failed one or more audit parts, which was a 20.1% failure rate. In total, 302 different inspection stations failed at least one MassDEP audit criteria on at least one audit. This was 25.4% of the 1187 stations audited between January 1, 2008 and September 30, 2008.

5.0 Applus Equipment Audit Results

Applus developed its equipment audit procedures based on the procedures implemented by MassDEP and its audit contractor, TESTCOM. These audits are part of Applus' maintenance program, and one part of their effort to identify and repair underperforming workstations.

Applus' equipment audit procedure includes the following parts:

| | |
|----------------------------|---|
| Visual Inspection | Visual check that all relevant equipment is connected, powered, and ready to perform an inspection. Check for visual signs of tampering. |
| Gas Analyzer Visual | Visual check of the gas analyzer including the condition of raw sample system (probe, hose, and filters), on-board calibration gases, and zero air gas generator. |
| Leak Check | Functional check for leaks in the raw sample system and the analyzer's ability to detect leaks during its 24-hour calibration. |
| Gas Bench | Accuracy check of the gas bench HC, CO, CO ₂ , NO _x , and O ₂ readings using 6 different audit gases. |
| Gas Cap Tester | Functional check of the workstation's ability to distinguish between passing and failing gas caps. |
| VMAS Visual | Visual check for proper installation of VMAS and condition of hoses. |
| VMAS O ₂ Sensor | Accuracy check of the VMAS O ₂ sensor using two audit gases and ambient air. |
| VMAS Flow | Accuracy check of VMAS flow measurement at three flow rates. |

Applus performed a total of 5,012 equipment audits between January 1, 2008 and September 30, 2008. 1,534 different workstations (lanes) were audited. Eight workstations were audited once, 167 workstations were audited twice, 876 workstations were audited three times, 393 workstations were audited four times, 74 workstations were audited five times, 12 workstations were audited six times, and 4 workstations were audited seven times.

There were a few areas where MassDEP and Applus equipment audit procedures differed. In one instance, the MassDEP gas cap test is based on two criteria:

- Visual: it is connected to the workstation and the calibration device is not attached (and all 8 gas cap adapters and the calibration wand are available)
- Performance: the device passes the pass cap, and the device fails the fail cap.

A gas cap tester may fail a MassDEP audit for either of these criteria. Applus' audit procedure for the gas cap tester combines the visual and performance criteria into a single pass/fail result.

The MassDEP and Applus audits also differ in how they treat failed workstation components. Components that fail an Applus audit are typically repaired or replaced during the audit. In Table 4, MassDEP counts any components that were repaired during the Applus audit as failures, reflecting the condition of the equipment as found, rather than as following repairs performed during the audit. No repairs are performed during MassDEP audits.

Table 4 presents a breakdown of results for the individual audit parts and the overall audit result. Although a total of 5,012 Applus audits were performed, the number of audit parts tested (table column “Tested”) was somewhat less than this because not all audits were complete audits.

**Table 4: Equipment Audit Results
January through September, 2008**

| Audit Part | Applus Technologies | | | | MassDEP |
|-----------------------------------|---------------------|------|--------|--------------|--------------|
| | Pass | Fail | Tested | Failure Rate | Failure Rate |
| Visual Inspection | 4,985 | 5 | 4,990 | 0.1% | 1.4% |
| Gas Analyzer Visual Inspection | 4,707 | 300 | 5,007 | 6.0% | 4.0% |
| Weather Station | NA | | | | 20.8% |
| Leak Check | 4,974 | 36 | 5,010 | 0.7% | 1.8% |
| 1 st Gas Bench Audit | 4,048 | 69 | 4,117 | 1.7% | 2.3% |
| 2 nd Gas Bench Audit | NA | | | | 86.4% |
| Gas Cap Tester | 5,006 | 5 | 5,011 | 0.1% | 0.1% |
| Inductive RPM Pickup | NA | | | | 0.9% |
| OBDII RPM Pickup | NA | | | | 0.1% |
| OBDII Tester | NA | | | | 0.0% |
| VMAS Visual Inspection | 4,968 | 9 | 4,977 | 0.2% | 0.6% |
| VMAS Dilute O2 Sensor | 4,122 | 14 | 4,136 | 0.3% | 1.9% |
| VMAS Dilute O2- 15% | 4,134 | 2 | 4,136 | 0.0% | 0.5% |
| VMAS Dilute O2- 8% | 4,122 | 14 | 4,136 | 0.3% | 1.9% |
| VMAS SAO Flow | 2,782 | 54 | 2,836 | 1.9% | 0.2% |
| Overall Audit Result | 4,554 | 458 | 5,012 | 9.1% | 20.1% |
| Combined Gas Bench + VMAS | 4,711 | 136 | 4,847 | 2.8% | 4.1% |
| Critical Audit Failures | | | | | 2.3% |
| Combined Critical Gas Bench/ VMAS | NA | | | | |
| Gas Cap Tester | NA | | | | 0.1% |
| Barometric Pressure | NA | | | | 0.0% |
| OBDII Test System | NA | | | | 0.0% |

Table 5 compares the failure rates for Applus equipment audits from January 1, 2005 through September 30, 2008. Note that the failure rate does not necessarily reflect the expected failure rate for the network as a whole because Applus sometimes conducted multiple audits of failing workstations, until an audit confirmed that repairs were successful.

Table 5: Applus Technologies Equipment Audit Results for 2005 through September 30, 2008

| Audit Part | 2005 Failure Rate | 2006 Failure Rate | 2007 Failure Rate | 2008 Failure Rate |
|----------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Visual Inspection | 0.5% | 1.1% | 0.4% | 0.1% |
| Gas Analyzer Visual Inspection | 18.0% | 12.2% | 14.0% | 6.0% |
| Leak Check | 1.6% | 3.2% | 3.1% | 0.7% |
| 1 st Gas Bench Audit | 4.6% | 6.6% | 3.4% | 1.7% |
| Gas Cap Tester | 0.3% | 0.2% | 0.3% | 0.1% |
| VMAS Visual Inspection | 2.3% | 2.7% | 2.3% | 0.2% |
| VMAS Dilute O2 Sensor | 3.3% | 3.0% | 0.7% | 0.3% |
| VMAS Dilute O2- 15% | 1.1% | 0.8% | 0.2% | 0.0% |
| VMAS Dilute O2- 8% | 3.3% | 3.0% | 0.7% | 0.3% |
| VMAS SAO Flow | 3.6% | 4.4% | 3.2% | 1.9% |
| Overall Audit Result | 25.8% | 24.2% | 21.8% | 9.1% |
| Combined Gas Bench + VMAS | 8.1% | 10.7% | 6.8% | 2.8% |