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SUBSTANTIVE POLICY STATEMENT

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Guidance Memorandum - VEIP-2015-001

Subject: Catalytic Converter Inspection for Area B Waivers

To: Gordon-Darby Arizona Testing, Inc. (GDAT) waiver staff
Vehicle Emissions Inspection Program (VEIP) referee staff

From: Shawn B. Kendall, Manager, Vehicle Emissions Inspection Program (VEIP)

Effective: July 24, 2014

Procedures and Guidance

When performing a waiver inspection for vehicles in Area B (Tucson Metropolitan Area), the following criteria related to the catalytic converter system will be considered:

1. A certificate of waiver shall not be issued to a vehicle that has a catalytic converter system that is missing or defeated.
2. A certificate of waiver shall not be issued to a vehicle equipped with an On-Board Diagnostic Computer (OBD) with a Malfunction Indicator Light (MIL), "Check Engine" or "Service Engine Soon" light commanded on by the computer and containing diagnostic trouble codes indicating the catalytic converter system is malfunctioning.
3. A certificate of waiver shall not be issued to a vehicle if the repair order or estimate paperwork provided to the waiver technician at the time of waiver inspection shows that a diagnostic determination has been made by the mechanic that the catalytic converter must be replaced.

Background and Rationale

On July 24, 2014, A.R.S. 49-542(R) was expanded to apply to Area B (Tucson Metropolitan Area). The above criteria are the specific conditions that prohibit a certificate of waiver from being issued related to the catalytic converter inspection.

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Related Statutes and Rules

A.R.S. 49-542(R):

“The director shall prohibit a certificate of waiver pursuant to subsection of this section for any vehicle which has failed inspection in area A or area B due to the catalytic converter system.”

Frequently Asked Questions

1. *Does this apply to Area A (Phoenix Metro area)?* – No. In Area A a quantitative catalyst efficiency test continues to be required until that requirement is eliminated in the State Implementation Plan (SIP).
2. *Is something other than a simple inspection for physical presence required on pre-OBD vehicles in Area B (Tucson Metro area)?* – Yes. Pre-OBD vehicles require a tail-pipe emission test and are subject to limits on emissions in order to receive a waiver, thereby verifying the emissions are low enough to be granted a waiver under federal guidelines. OBD vehicles do not have tail-pipe emission tests and must rely on the sensors built into the catalytic converter system to determine if it is working correctly.
3. *Why would submission of a repair order or estimate indicating the catalytic converter needs to be replaced be the basis for a waiver denial?* – The judgment of a professional mechanic indicating he has tested the catalytic converter system and that it is not working will be accepted as evidence that the catalytic converter system has failed inspection.

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July 24, 2014