



The Analyzer

THE WISCONSIN VEHICLE INSPECTION PROGRAM

WIVIP HELP LINE
(866)623-8378

Volume 1, Issue 7

Fall 2015

Frequently Asked Questions About The VW Diesel CAA Violation

In September 2015, EPA issued a Notice of Violation of the Clean Air Act to Volkswagen for producing and selling four-cylinder diesel cars that include a sophisticated software device that circumvents EPA emissions standards for certain air pollutants. EPA and the California Air Resources Board (CARB) have collaborated on testing these cars and have determined that vehicles on the road emit up to 40 times more pollution than emission standards allow.

Is EPA officially requiring Volkswagen to issue a recall now?

No. EPA expects to compel VW to issue a recall in the future to reduce the emissions impacts of these vehicles. Owners will be notified of that recall once Volkswagen and Audi have developed a remedial plan and EPA has approved the plan. Manufacturers are given a reasonable amount of time to develop a plan to complete the repairs, including both the repair procedure and manufacture of any needed parts. Depending on the complexity of the repair and the lead time needed to obtain the necessary components, it could take up to one year to identify corrective actions, develop a recall plan, and issue recall notices.

I live in an area that requires periodic emissions tests. What happens if my car fails?

It is unlikely that the presence of this device will cause your vehicle to fail. In fact, the defeat device was specifically designed to ensure that vehicles would pass inspection. The defeat device has been installed in the affected VW diesels since 2009. To date, EPA has no indication of any pattern failures with these vehicles during inspection and maintenance emission tests.

How much will this cost to fix?

Volkswagen will be required to implement corrective action at no cost to the owner.

Can I turn off the defeat device?

No. The device is embedded in the software code that runs the engine control computer.

What pollutants are being emitted?

Vehicles emit an array of pollutants. EPA standards control the allowable emission levels of nitrogen oxides (NOx), hydrocarbons, carbon monoxide, carbon dioxide, particulate matter, and certain toxic chemicals. The VW defeat device affects the way the NOx control system operates, resulting in higher NOx emission levels from these vehicles than from vehicles with properly operating emission controls.

How much more pollution is being emitted than should be?

NOx emission levels are 10 – 40 times higher than emission standards.

Is this contributing to bad air quality in my city/area?

All vehicles emit some pollution that, along with emissions from other sources, affects local air quality. Vehicles with high emission levels have a disproportionate impact. EPA emission standards are designed to protect local air quality and maintain clean and healthy air. The VW diesels with the defeat device do not comply with EPA emission standards.

Where can I get more information?

For more information please send an email to otaq@epa.gov

Information for this article provided by USEPA-OTAG, 9/20/15 (<http://www3.epa.gov/otaq/cert/violations.htm>)

[Models Affected]

- Jetta (MY 2009 – 2015)
- Jetta Sportwagen (MY 2009-2014)
- Beetle (MY 2012 – 2015)
- Beetle Convertible (MY 2012-2015)
- Audi A3 (MY 2010 – 2015)
- Golf (MY 2010 – 2015)
- Golf Sportwagen (MY 2015)
- Passat (MY 2012-2015)

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Clearing the Air About Using, Installing or Buying Aftermarket Catalytic Converters

An improperly functioning catalytic converter is one of the most common emission control components to cause a vehicle to fail an emission inspection. If it is determined that the catalytic converter is no longer functioning, the repair technician must consider replacement. Generally, there are only three situations when you can install an aftermarket converter: 1) If the converter is missing from the vehicle when brought in for exhaust system repair; 2) it failed an emission inspection and it is determined that the catalytic converter needs replacement; 3) If the vehicle is out of the warranty period (8 years/80,000 miles) and a legitimate need for replacement has been established and properly documented.

The act of removing a catalytic converter without replacing it with an approved replacement (known as "tampering") is illegal under federal law and is of great concern to EPA because of the high pollution levels that are emitted by vehicles without properly functioning emission controls. The original anti-tampering law was part of the Clean Air Act of 1970; it applied only to manufacturers and car dealers. The anti-tampering law was expanded by the 1977 Clean Air Act Amendments to apply to all automobile repair facilities, commercial mechanics, and fleet operators. And the 1990 Clean Air Act Amendments (CAAA) broadened the tampering provision even further; it now applies to everyone, including car owners.



What happens if I don't use the correct converter?

It is a violation of Federal law because it is likely to increase the amount of pollution coming out of the vehicle. Penalties for violations by individuals, service or repair shops or fleet operations are up to \$3,750 per violation. (Each improper installation is considered a violation). New car dealers can be penalized up to \$37,500 per violation. Any person who causes a violation could be subject to the same penalty as the installer.

How can I tell if an aftermarket converter meets USEPA requirements?

Any converter which meets EPA requirements must be properly labeled and warranted to meet Federal durability and performance standards. New aftermarket converters are required to have a 5 year/50,000 warranty on the converter shell and end pipes. They are also required to be warranted to meet USEPA's emission performance standards for 25,000 miles when the vehicle is properly used and maintained. The warranty covers loss of conversion efficiency, OBD system malfunctions, converter shell and pipe corrosion, and faulty welds that may occur during normal usage. The warranty does not provide coverage for defects due to over-fueling, engine misfire, or physical damage caused by road debris or accidents.

What about using converters from salvage yards or junked cars?

USEPA considers it a violation to install a used converter from a salvage yard or sell it for reuse unless it has been properly tested and labeled. Similarly it is a violation to install an untested used converter brought in by a customer, even if the customer insists that the used converter came off his/her vehicle.

How do I determine the correct After Market Catalytic Converter (AMCC) for the vehicle?

The effectiveness of converters depends upon their durability, performance and application. As a result, the USEPA has required aftermarket converters to meet certain minimum performance standards while also requiring installers to install the appropriate converters. In addition to the performance standards for replacement catalytic converters, the policy also contains other warranty, reporting and record-keeping requirements.

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There are various sources of information for determining the correct one to install on a vehicle. AMCC manufacturers have hardcopy and electronic versions of their product application guides for both CARB and federal AMCCs. These application guides include AMCC part number, make, model, and model year and engine displacement. The CARB website is available at www.arb.ca.gov/msprog/aftermktcat/aftermktcat.htm. These lists contain the CARB Executive Order number, AMCC part number, vehicle make, model, model year and engine displacement. There may be more than one certified AMCC available for a vehicle make/model/year.

Are installers required to fill out a warranty card for a new AMCC?

Yes. Every new ACMM comes with a 3-part warranty card that must be completed by the installer. The original copy is given to the customer, one copy is kept by the installer and the last copy is mailed to the AMCC manufacturer. You should retain a copy of the completed warranty card for a minimum of 4 years from the date of the new AMCC was installed.

Installers Checklist for New Aftermarket Catalytic Converters (pg 4)

A checklist, originally developed by the California Air Resource Board, can be found on page 4. It is a helpful guide for installers to use to ensure compliance with the Federal CAA and has been modified slightly to reflect Wisconsin regulations.

Resources used for this article included the USEPA Fact Sheet "What You Should Know About Using, Installing Or Buying Aftermarket Catalytic Converters"; State of New York, Department of Environmental Conservation "New Aftermarket Catalytic Converter Requirements & Used Catalytic Converter Prohibition FAQ; and California Environmental Protection Agency ARB "Installers Checklist for New Aftermarket Catalytic Converters".

Recognized Repair Facility Certifications

There are many benefits to becoming a recognized repair facility. Recognized repair facilities closest to a testing station are printed and given to motorists at the time their vehicle fails. Only repairs performed at a recognized repair facility can be considered in issuing a cost waiver at Technical Assistance Centers (TAC).

If your repair facility employs at least one technician with either an ASE L1 certification, a WISETECH certification or is a new car dealership, your facility is one step away from becoming a recognized facility. Included in this newsletter is an application for becoming a Recognized Repair Facility. Just complete the information and send copies of your technicians' certifications to Opus Inspection.

Once recognized, your inspection facility will appear on the wisconsinvip.org website as well as handouts to failed vehicle owners. Recognition status can be lost if you let your ASE certifications expire.

ASE L1 Certification credentials are valid for five years, and expire June 30 or December 31, depending on when certification was earned. More information regarding the ASE recertification process can be found at www.ase.com.

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USE THIS HANDY CHECKLIST TO ENSURE YOU HAVEN'T MISSED FULFILLING ANY INSTALLATION REQUIREMENTS!

Installers Checklist for New Aftermarket Catalytic Converters		V
1	The vehicle model is specifically included in the application list for the catalytic converter model I intend to install.	
2	I have verified that the vehicle's manufacturer's warranty for the stock catalytic converter has expired. Consult the owners manual.	
3	I have confirmed the need for a replacement catalytic converter. If the stock converter is still installed, a diagnosis that it is malfunctioning is required.	
4	The replacement converter will be installed in the same location as the stock converter (the front face location will be within three inches compared to the stock design).	
5	All oxygen sensors will remain installed in their stock location(s).	
6	The catalytic converter will be installed on a "one-for-one" basis (only one OEM converter is being replaced by the converter to be installed). Decreasing or increasing the number of catalytic converters (compared to stock configuration) is prohibited.	
7	Warranty Card: I have: (a) filled out the warranty card (b) obtained the customer's signature on the card (c) attached the card to the original repair invoice (d) returned a copy of the warranty card to the catalytic converter manufacturer.	
8	I have filed and will maintain a copy of all documentation for a period of at least four years from the date of installation.	

Helpful Tools on Program WebSite

www.wisconsinvip.org

Look-Up Previous Test Result:

[Look Up Previous Test Result](#)

Locate Inspection Facility Location:

[Find Inspection Facilities](#)

Locate Recognized Repair Facility:

[Find Recognized Repair Facilities](#)

Locate Non-Recognized Repair Facility:

[Find Non-Recognized Repair Facilities](#)

The L1 Exam is Changing!

2016 L1 Test Results Delay

ASE has notified the Wisconsin Vehicle Inspection Program administrators that there are some changes coming to the L1 Exam and results processing. ***Since a current L1 certification is one of the means to be a recognized technician/repair facility, the WIVIP would like to bring the upcoming changes to your attention.***

A new Composite Vehicle Type 4 (CV4) Reference Booklet will be introduced in January 2016. Due to this significant change in test content, the delivery of test results will be delayed between January 2016 and June 2016.

For technicians whose L1 certifications expire on December 31, 2015, you might consider taking your L1 recertification test as soon as possible. Registering and scheduling your test now will give you the best opportunity to find a convenient testing appointment before the test changeover and the holidays.

During the January 2016—June 2016 time period:

- The L1 certification and recertification tests will require the use of the new Composite Vehicle Type 4 (CV4) Reference Booklet, which will be available for download in December 2015.
- The L1 certification and recertification tests will consist of 75 questions and have a 180 minute (3-hour) time limit. You may want to consider scheduling a stand-alone appointment.
- All L1 tests results will generate a “notice of completion” document. You will not receive a pass/fail score report at the test center and your myASE profile will show “Score Pending”.
- Official pass/fail test results for L1 tests will NOT BE AVAILABLE UNTIL JUNE 2016.

You can register for testing at [myASE](#) and take advantage of their “Find-A-Seat” locator to browse for availability BEFORE you register.

Send Notice of Completion to WiVIP to Maintain Recognition Status:

If you are a technician who may be affected by this delay in test results, please provide a copy of your “Notice of Completion” to Opus. Your repair facility’s recognition status will be continued until your Spring L1 test results are available. The notice of completion and final test results can either be emailed to Opusinspection@gmail.com or faxed to the office at 262-641-5095.

Vehicles Requiring Testing In 2016

Testing Requirement	Model Years Tested
Registration Renewal Requirement for License Plates Expiring in 2016	Odd Model Year Vehicles: 1997, 1999, 2001, 2003, 2005, 2007, 2009, 2011, 2013
Change of Ownership Requirement	Vehicles over 5 Model Years Old: 1996—2011



5470 South Westridge Dr
 New Berlin, WI 53151
 262-641-5217 (voice)
 262-641-5095 (fax)

EMISSION REPAIR FACILITY PROFILE

(please circle one)	
UPDATE	NEWLY REGISTERED

If you wish to register your repair facility with the vehicle inspection program or need to update your business record, please provide the following information for your repair facility. Mail the completed form with technician certifications to address above, or fax it to 262-641-5095, or scan to sue.krueger@opusinspection.com. A recognized repair facility is one that employs at least one technician with ASE L1 certification, WISETECH training, or other equivalent training. Please attach copies of documentation for each technician's training or certifications.

FACILITY INFORMATION:			
Facility Name:	_____		
Street Address:	_____		
City:	State:	ZIP:	_____
Main Business Phone #:	()	E-Mail:	_____
Owner or Manager:	_____		County: _____

TECHNICIAN INFORMATION						
Name:	<i>(First Name)</i>	<i>(Last Name)</i>				

Certifications:	ASE	Expiration Date	ASE	Expiration Date	WISETECH	Date Graduated
Circle & Indicate Expiration Date	L1	_____	L2	_____	_____	_____
Other: (Explain) _____						

DIESEL CERTIFICATIONS: Please indicate if you have diesel certification for a specific make (Honda, Ford) of vehicle(s) you are certified to work on. List all that apply and attach diesel certification documentation to this application:

TECHNICIAN INFORMATION						
Name:	<i>(First Name)</i>	<i>(Last Name)</i>				

Certifications:	ASE	Expiration Date	ASE	Expiration Date	WISETECH	Date Graduated
Circle & Indicate Expiration Date	L1	_____	L2	_____	_____	_____
Other: (Explain) _____						
DIESEL CERTIFICATIONS: Please indicate if you have diesel certification for a specific make (Honda, Ford) of vehicle(s) you are certified to work on. List all that apply and attach diesel certification documentation to this application:						

VERIFICATION
 As owner/manager of this repair facility, I verify that my facility is actively engaged in the automotive repair business and that information provided is accurate. I understand that it is my responsibility to notify the Wisconsin Vehicle Inspection Program if my profile information changes.

_____	Date												
Repair Facility Owner/Manager													
OFFICIAL USE ONLY:													
Recognized: YES NO	Registration Number: <table border="1" style="display: inline-table; border-collapse: collapse; text-align: center;"> <tr> <td style="width: 20px; height: 20px;"> </td> </tr> </table>												