

**COMMONWEALTH OF VIRGINIA**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

*MOBILE SOURCE OPERATIONS SECTION*

|   |   |  |
|---|---|--|
| <b>OPERATIONAL ORDER</b>                                    | <b>NUMBER</b><br><br>9  | <b>EFFECTIVE DATE</b><br>January 19, 1993<br><b>Revised: December 20, 2000</b> |
| <b>SUBJECT</b><br>SPECIAL "COVERT"<br>INSPECTION PROCEDURES | <b>ORIGINATING UNIT</b><br><br>MOBILE SOURCE OPERATIONS SECTION |  |

**I. GENERAL**

- A. Special "Covert" Inspections of emissions inspection stations will be performed on an as needed basis by a covert officer; covert audits of Certified Emissions Repair Facilities may be conducted on occasion if circumstances warrant. The need for special inspections shall be identified by the following criteria:
1. Citizen complaint
  2. Vehicle Emissions Compliance Officer's (VECO) observations
  3. Inspection data reports (failure rates too low, improper data entry, etc.)
  4. Probation Status
  5. Annual special inspection - special inspections should be performed at emissions inspection stations at least once per year per number of emissions inspectors.
  6. Verification of Diagnosis and/or Repair - Deliberately tampered vehicles may be left at an emissions inspection station for an inspection and subsequent diagnosis and/or repairs, and possible retest, in order to audit the facility's handling of such activities. This process is designed to determine whether, for example, a vehicle is properly repaired and then retested or whether the vehicle is falsely passed after repairs that may or may not have been actually performed. While the focus is on the inspection process, covert audits of certified repair facilities, which are not emissions inspection stations, may be conducted on occasion if circumstances warrant (such as a high waiver rate from a particular repair facility, or a high incidence of waivers between a particular emissions inspection station and a particular repair facility).
    - a. In order to conduct such audits, the vehicle will first be tampered to fail the tailpipe emissions standards. Strategies to induce such failure include disconnecting or disabling spark plug(s) or wire(s), oxygen or other sensor(s), fitting with a hollow catalyst, etc. (See below.)

- b. The initial test may be conducted at the Mobile Source Operations Section (MSOS) referee facility and sent to the station for diagnosis and/or repair, and retest, or it may be sent to the station for all activities (initial test, diagnosis/repair, and retest) or other strategies may be devised.
  - c. The initial test may be conducted at the MSOS referee facility or at an emissions inspection station. Fictitious repair receipts may then be prepared (with some repairs actually performed on occasion) and the vehicle presented to an emissions inspection station for a retest to determine whether the inspector follows proper retest and repair verification procedures.
- B. Covert vehicles for Special Inspections will be obtained from the appropriate source on the day the special inspections are to be performed (see also Section V, “Obtaining and Disposing of Vehicles”). The covert vehicle will first be brought to the MSOS referee facility. The vehicle will be tampered in order to set-up the vehicle to fail the emissions inspection. A “Polaroid” camera will be used to visually record tampered components if appropriate. A “state” emissions inspection will be performed to include the issuance of a Vehicle Inspection Report (VIR). After review, the VIR will be filed at the referee facility along with the Polaroid picture(s) if applicable in order to document the vehicle’s condition prior to special inspections for the day. The inspection results will be entered on the Special Inspection Report (SIR) under the “State Inspection Results” section.

The vehicle identification number (VIN) and other vehicle information for each covert vehicle used will be entered into the Virginia Management database. This database controls how the covert vehicle information is returned to the emissions analyzer during the analyzer’s initial communications contact with the vehicle inspection database, which precludes the vehicle from being identified as a “retest” when presented at emissions inspection stations (unless coded to do so under A.6 above).

1. Tampering Procedures – Setting the Vehicle to Fail

- a. Visual Inspection Failure (Components) - If the purpose of the special inspection(s) is to determine whether proper visual inspection procedures are being followed by the inspector(s), one or more emissions control components will be tampered. Setting the vehicle to fail the visual portion of the emissions inspection (tampering) involves removing or disabling in an obvious manner one or more of the six (6) components inspected as part of the emissions inspection procedure. The systems inspected are: Positive Crankcase Ventilation System (PCV); Thermostatic Air Cleaner System (TAC aka ACL); Catalytic Converter System (CAT); Air Injection System (AIS); Fuel Evaporative System (EVAP); and Exhaust Gas Recirculation System (EGR). For example, the catalytic converter may be removed and replaced with a piece of straight pipe, the air injection pump may be removed or the belt (if so equipped) may be removed, or the EGR system may be disconnected or removed and the hose(s) plugged.

- b. Tailpipe Emissions Failure - On occasion, MSOS may desire to conduct a special inspection(s) of an entire inspection and/or repair operation. In such cases, the vehicle may be set to fail the tailpipe standards, and then, depending on the circumstances, left at the station for the inspection and/or repair (or an estimate for repair). The vehicle may be set to fail the tailpipe emissions standards by a variety of strategies. While research continues on the most successful strategies using the ASM equipment, success has been realized in the past by closing a gap on a spark plug. Other potential strategies include disabling the oxygen or other sensors, blocking air passages, removing the internal material from the catalytic converter, or a combination of such methods to ensure consistent failure of the tailpipe standards.
- c. If a vehicle is to be left at the station for inspection and/or repair (or an estimate for repair), a second covert officer will be utilized to act as a “friend” or “associate” to pick up and drop off the “customer” at the station.
- d. The vehicle’s failure of the test must be documented each day that the vehicle is to be used for covert inspections. The documentation will consist of a state test administered before any covert inspections are conducted for the day, photograph(s) of the tampered system(s), if applicable, taken just prior to the state test, and a completed state test information form.
- e. Initial tests, Retests, Estimates, Real & Fictitious Repairs - When conducting covert operations regarding inspection, re-inspection, estimates and/or repairs, a variety of strategies may be implemented for the operation. For example, a legitimate initial inspection may be performed at a station as part of a covert inspection, and the VIR from that inspection may be used at another station where a covert inspection retest is to be conducted. Other potential strategies include: an initial test conducted at the MSOS referee facility but set-up to appear to be a legitimate station, then presented to a station for estimate, repair and/or retest; repairs actually performed (whether at a station, at MSOS, or at VDOT, with fictitious repair receipts for the latter two) may be itemized, a Repair Data Form (RDF) completed and the vehicle presented at a station for a retest; repairs obviously not performed may be itemized on fictitious repair receipt, an RDF prepared and the vehicle presented to a station for a retest. In any such case, specific information about the entire operation, including the stated intent of the covert operation, documentation of all aspects of the operation, copies of any VIR(s), RDF(s), and/or repair receipts, etc. shall be made part of the official record and attached to the state test information form.

## 2. Retest Procedures

- a. A vehicle may be set-up for a retest audit by using an actual initial test failure from an emissions inspection station, or by conducting an initial test failure at the MSOS referee facility, to determine if the emissions inspector subsequently follows proper retest procedures.

- b. Potential areas of alleged violations such as data entry errors or failure to perform the reinspection shall be handled in accordance with the enforcement procedures.

3. Investigation of Special Inspections

- a. Investigations will be handled in accordance with established procedures to include the preparation of reports and recommendations.
- b. Areas of alleged violations will be reported on the SIR for investigation by the VECO.
  - (1) A VECO will handle the investigation of special inspections
  - (2) Results of such investigation shall be reported on the SIR along with the VECO's recommendations and any pertinent remarks.

4. Procedures for preparation and use of fictitious repair receipts.

- a. Repairs may be listed which have actually been performed. Such repairs may have been performed at a station, the repair facility, or at the Virginia Department of Transportation (VDOT) facility.
- b. Repairs may be itemized but obviously not performed in order to determine whether the inspector is properly checking for itemized repairs as required by retest procedures.
- c. Repair receipts along with a Repair Data Form (RDF) will be presented to the emissions inspection station along with previous test results to determine if proper retest procedures are followed.

C. The covert vehicle will then be driven to the inspection station and submitted for an emissions inspection. The covert officer is to observe the entire emissions inspection process, or as much of the inspection as possible. Note the inspector's name if available (other than via the VIR). The following questions should come to mind when observing the inspection:

- 1. Was a pre-inspection safety check conducted?
- 2. Was the VIN verified?
- 3. Did the inspector perform an inspection of all emissions control systems?
- 4. Did the inspector check for visible smoke?

5. Was the entire inspection process performed in accordance with program regulations (including proper advisement at the commencement and at the completion of the inspection process)?
  6. Was the proper test type performed (Acceleration Simulation Mode [ASM] or Two-Speed Idle [TSI] test)?
  7. Was the cooling fan used if appropriate?
  8. Was the exhaust properly vented from the building?
  9. Were the accessories turned off?
- D. At no time is the covert officer's identity to be disclosed to the inspection station, nor is the covert officer to entrap or otherwise suggest that the emissions inspection not be performed properly. Pay close attention to what station personnel say or do before, during and after the inspection.
- E. After leaving the station, the covert officer should find a suitable location to pull over, out of sight of the station. The station's inspection results will be entered under the "Station Inspection Results" section of the SIR at this time. The covert officer will also at this time check the condition of the vehicle, especially under the hood, to ensure that the vehicle is in the same condition as when it left the referee facility. Any changes noted will be documented in the "Comments" section of the Report. The vehicle will be restored to tampered conditions if necessary for additional special inspections for that day.
1. The documentation of the special inspection, including the covert vehicle condition and preparation, should be sufficient for building a legal case and establishing a performance record.
  2. The specific intent of the particular covert operation, i.e. whether for inspection, diagnosis/repair, and/or retest procedures, or combination, will be included in the "Remarks" section of the report. If the focus is on any aspect other than the inspection process (false pass for example), additional remarks or clarification will be necessary.
- F. When special inspections for the day have been completed, the vehicle will be returned to MSOS. Unless it has been assigned to MSOS for an extended period, it will be restored to its original condition and returned to the appropriate source. Vehicles that are assigned to MSOS for an extended period may be left in tampered condition until they are returned to their source or surplus, at which time they will be restored to their original condition. Note that the provisions of paragraph I.B. pertaining to documentation of the tampered items/condition and the "state" emissions inspection **must** be performed each day for all vehicles used for special inspections.

## **II. SPECIAL INSPECTION REPORT (Attachment 1)**

### **A. Station and Inspector Identification**

The following items will be notated by the covert officer:

1. Emissions Inspection Station Name
2. Station Number
3. Inspector Name
4. Inspector Access Code (ID).

### **B. Tampered Items**

The items that were tampered in order to set-up the vehicle to fail the emissions inspection will be listed by the covert officer.

### **C. Officer's Observations**

#### **1. Turned Away Inspections**

- a. If the inspection is turned away without a test being initiated on the analyzer, or rejected from testing, the item will be marked YES and all other items will be marked N/A. Descriptions of individual(s) and event(s) will be entered in the "Comments" section (see II.H.), and the Rejection from Testing form attached to the SIR if provided by the station. If the vehicle is rejected from testing due to tampered items, it will be considered an aborted test (see below).
- b. Any other occurrence will be marked NO.

#### **2. Verification of VIN from vehicle**

- a. The item will be marked YES if the VIN is verified by inspector observation directly from the vehicle.
- b. The item will be marked NO if the above is not done. A brief description of where/how the inspector obtained the VIN, or portion of VIN for data entry if the full VIN was obtained via bar code scanning, shall be entered in the "Comments" section (see II.H.).

#### **3. Accessories Turned Off**

- a. The item will be marked YES if the covert officer is asked to turn off accessories or if the inspector turns them off.
- b. All other occurrences will be marked NO.

4. Pre-Conditioning

- a. The item will be marked YES if the covert officer observes the inspector checking to ensure that the vehicle has been pre-conditioned in accordance with established procedures for the type of inspection being conducted (ASM or TSI).
- b. All other occurrences will be marked NO.

5. Inspection Procedures

- a. The covert officer's observations will be indicated with a YES for satisfactory, a NO for unsatisfactory, or an N/A for not applicable.
  - (1) The item will be marked YES if the inspection was performed in accordance with established procedures.
  - (2) The item will be marked NO if the inspection was not performed in accordance with established procedures.
  - (3) The item will be marked N/A if an item does not pertain to the inspection of the particular vehicle being inspected.
- b. The "Other" block will only be marked NO when any violation other than those specifically asked about has been observed. Otherwise, it will be marked N/A.

6. Signature

- a. The item will be marked YES if the inspector signs the VIR.
- b. The item will be marked NO if the inspector initials the report, fails to sign the report, or if the signature does not match the pre-printed name on the report.

7. Aborted Tests

- a. If an inspection is initiated with the analyzer, it will not be considered an aborted test if a VIR is issued to the covert officer. It will be marked NO.
- b. If an inspection is initiated with the analyzer and the inspector does not issue a report to the covert officer, it will be considered an aborted test. It will be marked YES, and the covert officer will explain any circumstances of the aborted test in the "Comments" section of the SIR.
- c. If the inspector begins the inspection, whether or not the analyzer is used, and detects tampering, and then informs the covert officer that the vehicle cannot be inspected until the item(s) is restored/repaired/replaced, it will be considered an

aborted test. This situation also applies to a rejection from testing for a tampered item(s). It will be marked YES.

8. Special Procedures for Certain Vehicles as Identified through the Analyzer Software (e.g., Ford/Honda restart procedures)
  - a. The item will be marked YES if the special test procedures are properly utilized in accordance with analyzer screen prompts.
  - b. The item will be marked NO if the special test procedure was not properly utilized in accordance with analyzer screen prompts.
  - c. The item will be marked N/A if there are no special procedures for the vehicle.

**D. Accessories**

The covert officer will note the specific accessories that were left on, as well as the condition(s) of such accessory(ies).

1. Radio - high or medium volume
2. Air Conditioner (or heater/defroster) - high or medium fan speed
3. Lights (parking and/or headlights)
4. Other - Note specific accessory(ies) and exact condition(s).

**E. Vehicle Information**

The covert officer will enter information relevant to the vehicle that was used for the special inspection:

1. Model Year
2. Make
3. Model
4. Vehicle Identification Number
5. Tag Number

**F. Inspection Results**

1. The covert officer will enter the state inspection results from the report produced at the MSOS referee facility.
2. The covert officer will enter the station inspection results from the report issued at the emissions inspection station.

- a. If a report was not issued, the results will be entered as N/A.
- b. In addition, the covert officer will enter the time of arrival at and departure from the emissions inspection station.

**G. Diagnosis/Repair Information**

1. If the vehicle was left at the station for diagnosis/repair (and/or inspection), the covert officer will note the specific condition of the vehicle when presented to the station and the intent of the covert operation (whether to obtain diagnosis only, diagnosis and repair, and/or retest following repair).
2. The covert officer will note the specific diagnosis and obtain an estimate of repairs and enter this information on the SIR. If a recording is made via the MSOS answering machine, the tape will be transcribed; the transcription will be signed and dated by the covert officer and attached to the SIR. If necessary due to the circumstances of the matter, the tape recording may be secured and attached to the SIR.
3. If repairs, or repairs and subsequent retest, are authorized, the covert officer will enter this information on the SIR.
4. Upon retrieval of the vehicle, copies of all estimate sheets (if provided) and receipts/invoices will be attached to the SIR. Payment for all work will be in accordance with established administrative procedures.

**H. Comments**

1. The covert officer will enter any physical characteristics that would assist the VECO in identifying the inspector.
2. Additional comments pertinent to the inspection, diagnosis and/or repair information or process shall also be entered.
3. The covert officer's name will be entered.

**III. INVESTIGATION OF SPECIAL INSPECTION**

**A. Assignment of Special Inspection Report**

1. The investigation of the SIR will be assigned to the VECO in whose district the facility is located. In unusual circumstances, the Program Manager (PM) may designate another VECO to conduct the investigation.
2. The VECO will complete the investigation within the assigned fifteen (15) days unless an extension is granted.

B. Manual Log

1. The covert officer will forward the SIR to the MSOS Technical Officer (MSTO) for administrative review.
2. After administrative review, the MSTO will record the following information in the manual log:
  - a. Log #
  - b. Date
  - c. Facility Name
  - d. Facility #
  - e. Covert Officer's Name
  - f. VECO assigned
  - g. Due Date
  - h. Inspector/Technician
3. The MSTO will then forward the SIR to the VECO to proceed with the investigation.

C. Recommendations

1. The VECO will investigate the SIR, carefully examine all facts, and make a recommendation as follows:
  - a. In Compliance
    - (1) Commendation - If the emissions inspection facility or inspector/technician has fulfilled its responsibilities, **in all aspects** of the emissions inspection process, a Letter of Appreciation may be recommended, noting the inspector/technician who performed the inspection and/or diagnosis/repairs (and/or retest if applicable).
    - (2) In Compliance - If the facility and/or inspector/technician have fulfilled their responsibilities by performing an emissions inspection according to procedure, but a minor non-inspection error has been noted, they may nevertheless be recommended for "In Compliance" and the VECO will enter this recommendation with additional comments entered in the "Remarks" section.

NOTE: They may also be found to be "In Compliance" if there was a legitimate reason for not performing the inspection or repair. An explanation shall be provided in the "Remarks" section.

- b. Other (Not In Compliance)
    - (1) This category shall be used for minor inspection procedural violations, non-inspection errors considered “not in compliance,” or an irresolvable dispute of the facts, which will not be resolved with the issuance of a Notice of Violation (NOV).
    - (2) Additional comments explaining this recommendation will be required. Such comments shall include whether additional training was provided, and note reference to specific rule(s), regulation(s), or Information Bulletin(s) as appropriate. All such information shall be entered in the “Remarks” section.
  - c. Suspension (# of days) - an NOV has been issued and the number of days of suspension will be entered, whether negotiated or imposed.
  - d. Civil Charge (\$ amount) - An NOV has been issued and the negotiated amount of the voluntary civil charge will be entered.
  - e. Letter of Reprimand - An NOV has been issued and the VECO is recommending a Letter of Reprimand in lieu of a suspension and/or civil charge.
  - f. Probation - An NOV has been issued and the VECO is recommending, in addition to or in lieu of any item above, terms of probation. The terms of probation may be a probationary period not to exceed 12 months, specific action(s) to be taken by the affected party, or a combination of both (including an action the completion of which may reduce the probationary time period).
  - g. Revocation - An NOV has been issued and the VECO is recommending a permanent period of suspension (revocation of permit/license/certification).
2. Upon completion of the investigation, the VECO will proceed to enter Findings, Recommendations and Remarks on “Page 3” of the SIR. (Attachment 2)

#### **IV. APPROVAL PROCESS**

- A. If the PM does not concur with the VECO’s recommendations, the SIR will be returned to the VECO for additional action as necessary. Once such action has been completed, and the VECO has made appropriate changes (edits) to the SIR, it will be resubmitted to the PM for approval.
- B. If the PM concurs with the recommendations, such concurrence will be noted by the PM’s appropriate notation and date. This action constitutes final approval of the SIR.
- C. The VECO will then take appropriate action as approved.

- D. The SIR will be forwarded to the MSTO for appropriate logging and filing.
- F. The PM or Regional Compliance Manager may perform the approval functions in the absence of the other.

**V. PAYMENT for INSPECTIONS, ESTIMATES and REPAIRS**

- A. Covert Inspections - The petty cash drawer is the source for cash (up to \$50.00 per expense) for inspections. A petty cash authorization form shall be completed for each covert inspection planned for the day. The forms are then taken to the Program Manager (PM) for approval. The completed forms are then given to the Petty Cash Custodian who will dispense the cash from the petty cash drawer. When the inspections have been completed, three copies of the inspection report, the original receipt (if any) and two copies of such original receipt, and any excess cash from the original amount shall be given to the Petty Cash Custodian.
- B. Covert Inspections, Estimates, and/or Repairs - As above, the petty cash drawer is the source for individual expenditures of up to \$50.00.

[The maximum cash in the drawer has been increased to \$900.00, and research is being conducted as to whether the limit on individual expenditures may be increased also. Other options are also being explored.]

**VI. OBTAINING and DISPOSING of VEHICLES**

The Covert Reviewer will have the administrative responsibility of ensuring an adequate and varied supply of covert vehicles, and will be responsible for obtaining, maintaining, and disposing of all such vehicles in accordance with established criteria, procedures, and applicable regulations. Such vehicles will be obtained in sufficient number and rotated on a schedule, in sufficient variety and from a variety of sources, which will guard against detection by emissions inspection station personnel. Vehicles will be obtained which cover the range of vehicle types, sizes, configurations and fuel delivery systems that are subject to the vehicle emissions inspection program in Northern Virginia.

**A. State Vehicles**

The primary sources of vehicles are the Virginia Department of State Police (VDSP) and the Virginia Department of Transportation (VDOT).

VDSP is generally able to provide passenger vehicles, subject to availability and their own needs, having a gross vehicle weight rating of 8,500 lbs. or less consisting of vehicles approximately 5-15 years of age. An effective working relationship has been established and maintained with the VDSP contact, Wayne Cosner (804-674-2156).

VDOT Fleet Management is able to provide a range of passenger vehicles, including passenger vans when available. Bill Colavita (804-367-6886) has indicated willingness to approve any additional purchase or lease of such vehicles as the need arises. Requests for such vehicles must be submitted on form CP-3 (for assignment of pool vehicles) or CP-15 (for purchase or lease of vehicles), to the attention of Mr. Colavita and routed through the DEQ Transportation Officer, Jay Gutshall (804-698-4402).

In addition, Lynn Abraham (804-786-5179) of the Administrative Services Branch of VDOT Fleet Management (under Mr. David Smith) handles the purchase or lease of non-passenger type vehicles. Purchase or lease of such vehicles will be approved following the approval of the form CP-15 from Mr. Colavita.

#### B. Public Auctions

VDOT also handles auction sales and occasionally receives vehicles from other agencies such as the ABC Board. Mr. Herb Thompson handles this activity for VDOT. The majority of these vehicles are in such condition that they will not pass a Virginia safety inspection and may need major repairs; nevertheless, this remains a viable alternative source of vehicles. Mr. Thompson is aware of the desire for useable vehicles, and will notify MSOS if any become available.

Mr. Joe Thomas of the Department of General Services (804-236-3662) also handles the auction sale of state vehicles turned in after extensive use by an agency such as the VDSP.

#### C. Surplus Federal Vehicles

Vehicles surplus by the Federal Government can be acquired for a service charge based on the percentage of what the Federal Government paid for the vehicle. Vehicles available include four door sedans, light trucks and mini-vans from a variety of manufacturers. For vehicle availability, the contact person is Shirleen Route of the General Services Administration (GSA) Office of Utilization Donation (202-619-8968 or 202-619-8990). For Inter-Agency Transfer, contact Cheryl Starr, Alvin Hatcher or Cornelius Wyche of the Virginia Department of General Services, Surplus Property Warehouse (804-236-3674).

#### D. Vehicle Disposal

Vehicles that have been purchased by DEQ and then returned for surplus sale at auction can have approximately 75% of the sale funds returned to DEQ. Mr. Bill Stagg in the DEQ Purchasing Division handles these procedures.

Vehicles obtained from VDSP or VDOT may be returned through normal channels, often obtaining a replacement vehicle at the same time.

Prior to disposal of any vehicle, from any source, it must be returned to an untampered condition; all emissions component systems must be reinstalled, properly connected and functioning (if removed or tampered).

## VII. COVERT IDENTITY

- A. Vehicle Registration - The names and streets shall be fictitious, but the towns, counties and zip codes shall exist and be correct. These shall be investigated and confirmed through local telephone books and other sources that they do not exist. Vehicle registration is available through DMV. A letter of request, DMV Form VSA 1-49 and DMV Form VSA 14 (and, for new registrations, DMV Form VSA-17A) shall be forwarded to Robert D. Holcomb, Commissioner, DMV, Investigative Services Administration, to the attention of Investigator Suzie Clingenpeel. These registrations should be for no longer than three (3) months at a time in order to enhance the effectiveness of the program.
- B. County Property Stickers - Each vehicle should have affixed to the windshield a county property sticker, which enhances the apparent legitimacy of the vehicle's registration. The county of issue should match the address on the vehicle registration.

In Fairfax County, a Letter of Request should be forwarded to Wayne Boles, Fairfax County Department TARGET, Attention Julio Vargas, Office of Finance (703-324-3114).

In Prince William County, a Letter of Request should be forwarded to Ron Gitlin, Manager of Assessments, Prince William County Tax Payer Services, PO Box 2467, Prince William, Virginia 22193 (703-792-6710).

In Stafford County, a Letter of Request should be forwarded to Elizabeth Dailey, Treasurer, Stafford County, PO Box 68, Stafford, Virginia 22555 (504-659-8715).

In Loudoun County, a Letter of Request should be forwarded to Carol Costello, Deputy Treasurer, County of Loudoun, PO Box 347, Leesburg, Virginia 20178 (703-777-0284).

In Arlington County, a Letter of Request should be forwarded to Frank O'Leary, Treasurer, Arlington County, 2100 Clarendon Boulevard - Suite 20, Arlington, Virginia 22201 (703-228-3255).

- C. Telephone Line - A separate telephone line has been installed for MSOS use in covert operations. This line will have a telephone number significantly different from the DEQ numbers to avoid the possibility of a dialing error reaching a DEQ office. An answering machine will be utilized on this telephone line, on which station personnel may leave messages to the "customer" regarding the inspection, estimate, or repair status of the vehicle left at the station for service. A cell phone may also be used for this purpose on occasion.
- D. Covert Vehicle Database - State personnel will have access to the available inspection databases to permit the creation and maintenance of covert vehicle records. Fictitious records of vehicles, which would match the fictitious registration(s) will be created in the database; when a vehicle is presented for inspection at a station, these files will be accessed, the vehicle information on the analyzer system screen will match the vehicle presented, and will not indicate any prior inspection records for that vehicle.

LIST OF ATTACHMENTS

- |              |                                       |
|--------------|---------------------------------------|
| Attachment 1 | Special Inspection Report (2 Pages)   |
| Attachment 2 | “Page 3” of Special Inspection Report |

Commonwealth of Virginia  
 Department of Environmental Quality  
 Mobile Source Operations Section

|         |         |
|---------|---------|
| Officer | : _____ |
| Log #   | : _____ |
| Due     | : _____ |

Date: \_\_\_\_\_

**SPECIAL INSPECTION REPORT**

Station ID/Name: \_\_\_\_\_

Inspector ID/Name: \_\_\_\_\_

TAMPERED ITEMS:

- |          |          |
|----------|----------|
| 1. _____ | 3. _____ |
| 2. _____ | 4. _____ |

ACCESSORIES LEFT ON (IN WHAT CONDITION):

- |          |          |
|----------|----------|
| 1. _____ | 3. _____ |
| 2. _____ | 4. _____ |

OFFICER'S OBSERVATIONS:

|   | Yes                      | No                       | N/A                      |
|---|--------------------------|--------------------------|--------------------------|
| Inspection Turned Away _____                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Preliminary Inspection Performed Properly _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Verification of VIN from Vehicle _____          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Vehicle Information Properly Entered _____      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Proper Inspection of the Following Items:

|                               | Yes                      | No                       | N/A                      |                             | Yes                      | No                       | N/A                      |
|-------------------------------|--------------------------|--------------------------|--------------------------|-----------------------------|--------------------------|--------------------------|--------------------------|
| Air Injection System _____    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | TAC System _____            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| EGR System _____              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Gas Cap Pressure _____      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| PVC System _____              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Evap. System Pressure _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Catalytic Converter _____     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | OBD Fault Code(s) _____     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Fuel Evaporative System _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Other (See Comments) _____  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

|  | Yes                      | No                       | N/A                      |
|--|--------------------------|--------------------------|--------------------------|
| All Accessories Turned Off _____                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Cooling Fan Properly Used _____                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Vehicle Properly Restrained _____                            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Vehicle Properly Preconditioned _____                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Vehicle Exhaust Properly Ventilated _____                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Vehicle Properly Evaluated for Visible Smoke Emissions _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Proper Test Type Performed _____                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Retest Information Processed Correctly _____                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspection Aborted _____                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Proper Customer Advisement Provided _____                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Vehicle Inspection Report Signed and Issued _____            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Officer : \_\_\_\_\_  
 Log # : \_\_\_\_\_  
 Due : \_\_\_\_\_

VEHICLE INFORMATION

Year/Make/Model: \_\_\_\_\_ VIN: \_\_\_\_\_

STATE Inspection Results

Air Injection System   
 EGR System   
 PCV System   
 Catalytic Converter   
 Fuel Evaporative System   
 TAC System   
 Gas Cap Pressure   
 Evaporative System Pressure   
 OBD Fault Code

STATION Inspection Results

Air Injection System   
 EGR System   
 PCV System   
 Catalytic Converter   
 Fuel Evaporative System   
 TAC System   
 Gas Cap Pressure   
 Evaporative System Pressure   
 OBD Fault Code

|          | 15 mph               | 25 mph               | IDLE                 | 2500 rpm             |
|----------|----------------------|----------------------|----------------------|----------------------|
| HC ppm   | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| CO %     | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| NO ppm   | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| RPM      | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| Dilution | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |

|          | 15 mph               | 25 mph               | IDLE                 | 2500 rpm             |
|----------|----------------------|----------------------|----------------------|----------------------|
| HC ppm   | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| CO %     | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| NO ppm   | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| RPM      | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| Dilution | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |

Smoke   
 Mileage   
 Test Time   
 TIN

Smoke   
 Mileage   
 Test Time   
 TIN

COMMENTS

Covert Officer: \_\_\_\_\_ Time In: \_\_\_\_\_ Time Out: \_\_\_\_\_

Covert Officer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

|           |       |
|-----------|-------|
| Officer : | _____ |
| Log # :   | _____ |
| Due :     | _____ |

V.E.C. OFFICER FINDINGS

|                             |  |                            |  |
|-----------------------------|--|----------------------------|--|
| Inspection Turned Away      |  | Other                      |  |
| Preliminary Inspection      |  | Accessories Turned Off     |  |
| Verification of VIN         |  | Cooling Fan Used           |  |
| Air Injection System        |  | Vehicle Restrained         |  |
| EGR System                  |  | Vehicle Preconditioned     |  |
| PCV System                  |  | Exhaust Ventilated         |  |
| Catalytic Converter(s)      |  | Visible Smoke Evaluated    |  |
| Fuel Evaporative System     |  | Proper Test Type           |  |
| TAC System                  |  | Retest Information Correct |  |
| Gas Cap Pressure            |  | Inspection Aborted         |  |
| Evaporative System Pressure |  | Customer Advisement        |  |
| OBD Fault Code(s)           |  | Sign and Issue VIR         |  |

RECOMMENDATIONS

|                                |                          |                          |                          |                          |                          |         |   |
|--------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|---------|---|
| S                              | I                        | S                        | I                        | S                        | I                        | S       | I |
| <input type="checkbox"/>       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Months  |   |
| In Compliance                  |                          | w/ Commendation          |                          | Probation                |                          | Days    |   |
| <input type="checkbox"/>       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Amt. \$ |   |
| Letter of Reprimand            |                          | Suspension               |                          | Civil Charge             |                          |         |   |
| Probationary Act (See Remarks) |                          | Revocation               |                          |                          |                          |         |   |
| Other (See Remarks)            |                          |                          |                          |                          |                          |         |   |

(S - Station I - Inspector)

REMARKS

V.E.C. Officer: \_\_\_\_\_

V.E.C. Officer Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Program Manager Signature: \_\_\_\_\_

Date: \_\_\_\_\_