

From: Dalton, Jessica <Jessica.Dalton@dep.state.fl.us>
Sent: Monday, October 7, 2024 11:44:52 AM
To: Arthur Eberle <Arthur.Eberle@Compliance-Assurance.com>; Koerner, Jeff <Jeff.Koerner@FloridaDEP.gov>
Cc: Read, Hastings <Hastings.Read@FloridaDEP.gov>; Jones, Griffin W <Griffin.W.Jones@FloridaDEP.gov>
Subject: RE: Smoke School by Alternative Method 152A

Greetings Art!

Thank you for your follow-up email. As I indicated during our phone conversation a couple of weeks ago, Florida will accept VE observations performed by individuals certified via ALT-152 as it has been approved by EPA.

Regarding the requirement to report student certifications under this alternative method to our Department, please refer to 62-297.320(2)(b), Florida Administrative Code (F.A.C.).

You are only required to maintain attendance records and make them available upon request. Since we require certifications be attached to submitted test reports (see 62-297.320(1)(c), F.A.C.), we rarely need to request attendance records.

62-297.320 Standards for Persons Engaged in Visible Emissions Observations.

(1) Training and Certification Required. All persons engaged in determining the opacity of visible emissions in Florida shall attend training and be certified by a training provider in accordance with the procedures and requirements set forth below.

(a) Certification shall consist of satisfactory attendance and completion of a classroom lecture and a field qualification. For certification purposes, the classroom lecture and field qualification are separate and independent requirements.

(b) Attendance at the classroom lecture is required no less frequently than every three years. Successful completion of the field qualification is required no less frequently than every six months.

(c) Proof of certification shall be made by including copies of the signed and dated certificates or cards issued by the training providers with documentation of visible emissions observations submitted to the department, or otherwise upon request of the department.

(2) Requirements for Training Providers. All persons providing training leading to the certification of persons engaged in determining the opacity of visible emissions in Florida shall meet the requirements of subsections 62-297.320(2)-(8), F.A.C.

(a) For certification purposes, the classroom lecture and field certification are separate and independent requirements. For each course scheduled, each training provider shall offer a classroom lecture and one or more days of field qualification.

(b) Copies of quality assurance documentation, attendance records and field data sheets shall be maintained for a period of no less than three years after the conclusion of each course and shall be made available to the department upon request.

Please let me know if you need anything else.

Regards,



Jessica Dalton

Environmental Administrator

Division of Air Resource Management

Compliance Assurance Section

2600 Blair Stone Rd, MS 5505

Tallahassee, FL 32399-2400

(850) 717-9106

Jessica.Dalton@FloridaDEP.gov

From: Arthur Eberle <Arthur.Eberle@Compliance-Assurance.com>

Sent: Monday, October 7, 2024 12:20 PM

To: Koerner, Jeff <Jeff.Koerner@FloridaDEP.gov>

Cc: Dalton, Jessica <Jessica.Dalton@dep.state.fl.us>

Subject: Smoke School by Alternative Method 152A

EXTERNAL MESSAGE

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We have performed Method 9 Training in the State of Florida for several years and report the results of certification for each training event to Jessica Dalton. Recently our system for providing this training through Virtual Reality was approved by US EPA <https://compliance-assurance.com/PDFs/EPA-Approval-Letter-CAA-ALT-152.pdf>. We wanted to confirm that Florida does accept all alternative methods approved by US EPA and would accept Visible Emission Observations made by those certified with this alternative method.

We would also like to make sure of how we should proceed with reporting those whose client address is in Florida. In traditional Smoke school there is an event, and everyone is trained, and we close out the event and send the spreadsheet of those certified to whomever we need to send a report. With VR there is not really an end. The session we create can be accessed at any time and so we are uncertain how to handle the reporting requirements.

There are also the additional complications as to exactly where the training is occurring --- Regardless anyone can verify the certification records with the Student's last name and Student Record number (3693 and Eberle for my records) <https://compliance-assurance.com/certs.php> but I do not know if that will satisfy your state reporting requirements.

[Print Your Method 9 Certification Certificate or Card](#)

Online Method 9 certification status and printing of cards for your records

compliance-assurance.com

It would be greatly appreciated if you could answer the first question in the affirmative and for the second question, direct us how to appropriately work out the reporting requirements when someone could be certified anywhere at any time by using Virtual Reality.

Arthur Eberle, B.S. ChE, MBA - CEO
Compliance Assurance Associates, Inc.
office - 901.381.9960 then 2 or
mobile - 901.335.6331
682 Orvil Smith Rd
Harvest, AL 35749