

From: Fields, Mark <mark.fields@dnr.iowa.gov>
Sent: Thursday, October 24, 2024 12:01:54 PM
To: Arthur Eberle <Arthur.Eberle@Compliance-Assurance.com>
Cc: Hutchins, Brian <brian.hutchins@dnr.iowa.gov>
Subject: Re: Smoke School by Virtual Reality

Arthur,

The Iowa DNR is aware of EPA's Alternative Method 152 approval. The Iowa DNR would be accepting these certifications due to EPA's approval of the alternative method.

Please be aware that the state of Iowa Code 21.13 (pasted below) requires that for initial certification of a EPA Method 9 observer in Iowa that the observer must make 250 readings of white plumes and 250 readings of black plumes in the smoke reading course.

Please let me know if you have questions about this initial certification requirement.

Thank you,
Mark Fields

IAC

Ch 21, p.1

567—21.13(455B) Methodology and qualified observer. The federal method for visual determination of opacity of emissions and requirements for qualified observers as defined in 40 CFR Part 60, Appendix A, Method 9, as amended through November 14, 1990, is adopted by reference.

To qualify as an observer, a candidate must, after meeting the requirements established in 40 CFR Part 60, Appendix A, Method 9, have on record with the department a minimum of 250 readings of black plumes and 250 readings of white plumes, taken at approved smoke reading courses.

[ARC 7950C, IAB 5/15/24, effective 6/19/24]

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