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Brad Little, Governor
Jess Byrne, Director

August 12, 2025

VIA EMAIL

Larry Whicher, Associate Manager
Compliance Assurance Associates, Inc.
682 Orvil Smith Rd
Harvest, AL 35749

RE: Visual Determination Of Opacity Alternative Method (ALT-152) Conditional Acceptance Letter

Dear Mr. Whicher:

Compliance Assurance Associates, Inc. (CAAI) recently requested the Idaho Department of Environmental Quality (DEQ) to issue a written statement regarding the agency's acceptance of CAAI's virtual reality headset-based system for conducting U.S. Environmental Protection Agency (EPA) Method 9 opacity plume demonstrations and observer certification.

On August 13, 2024, EPA issued an [official letter](#) in response to CAAI's request to obtain agency approval of CAAI's alternative method as described by EPA Method ALT-152. The letter stated that based on a thorough review of CAAI's submittals, EPA concludes that CAAI's virtual reality headset-based alternative method yields observers that are capable of conducting opacity observations with equivalent or better accuracy as observers certified using the existing Method 9 procedures. With the letter, EPA approved the use of the CAAI's virtual reality-based method.

DEQ does not possess information contradicting EPA's position. As such, it is reasonable for DEQ to concur with EPA's informed assessment. DEQ is therefore poised to conditionally accept visual opacity determinations conducted by individuals certified using the CAAI virtual reality headset-based ALT-152 method. As a condition to its position, DEQ stipulates that determinations will only be accepted if the observer has previously conducted initial certification, or follow-up recertification, via the traditional field method. Finally, this letter is in no way intended to specifically endorse CAAI's ALT-152 method and/or systems.

If you have questions regarding this letter, please contact me directly at 208-373-0102, or emanuel.ziolkowski@deq.idaho.gov

Sincerely,

A handwritten signature in blue ink that reads "Emanuel Ziolkowski".

Emanuel Ziolkowski

Air Quality Compliance Assurance Program Supervisor; Idaho Department of Environmental Quality
State Office