

EPA Alternative Method ALT-152A — Request for State Acceptance

Summarize this email



Stephanie Mullaney
Chasity Miranda

Email for VR state acceptance.

From: Myott, Brad (EGLE) <MYOTTB@michigan.gov>

Sent: Monday, May 11, 2026 12:03 PM

To: Stephanie Mullaney <stephanie.mullaney@Compliance-Assurance.com>

Subject: FW: EPA Alternative Method ALT-152A — Request for State Acceptance

Dear Ms. Mullaney,

Thank you for your email inquiring on Alt-152 in Michigan.

Since Alt-152 intersects with several different regulatory frameworks, it's helpful to consider its use under four separate scenarios:

1. Federal requirements: Since Alt-152 is a federally approved method it can be used for federal permit testing requiring Method 9 including NSPS Subpart OOO compliance because it was approved by the EPA. ALT-152 should be noted in the test plan.
2. State Permit test plan requirements: For permit compliance with state visible emission (VE) requirements such as Rule 301 that require a test plan, such as an annual stack test or initial performance testing, then the use of ALT-152 should be noted in that test plan as alternative method. District offices in Michigan will review the test plan and alternative request accordingly.
3. State Permit or Rule non-test plan requirements: For other types of general VE observations without a test plan such as those required by permit or rule, facilities will need to work with their respective district office to obtain approval. Districts will review these requests on a case-by-case basis. This situation typically would involve facility personnel conducting visible emissions observations on baghouses, roads, piles, etc. These observations may or may not require method 9 certification.
4. State Rule requirements: Michigan Air Pollution Control Rule 303 specifically requires VE readings be conducted per method 9 or an alternative approved by the department. Additionally, Rule R 336.2004 (Rule 1004), subrule (4), likewise authorizes the department to approve alternative methods for determining compliance with visible emission standards. The phrase "approved by the department" is understood to mean approval on a case-by-case basis.

R 336.1303 Grading visible emissions.

Rule 303. The opacity of a visible emission shall be determined by a qualified observer and shall be certified in accordance with, and using the

procedures specified in, reference method 9 or an alternative method approved by the department.

Rule R336.2004 Reference test methods; adoption of federal reference test methods.

Rule 1004(4) Determinations of compliance with visible emission standards for stationary sources must be conducted as specified in 40 CFR part 60, appendix A, test method 9 or another alternative method approved by the department...

At this time, Michigan has not adopted Alt-152 into its Rules nor established a formal policy allowing for general approval in rule or non-rule scenarios, therefore we are unable to grant a blanket approval of Alt-152. We are still trying to identify the best way to address this alternative long term but, in the meantime, we are able to work with facilities that are subject to method 9 requirements in obtaining the necessary department approval to use Alt-152. For facilities that have questions on using an alternative method they should reach out to their district office. See link below for contact information.

Link to AQD district offices.

[Air Quality Division District Office Contact Information](#)

Manager, Field Operations
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
517-294-9394

MyottB@Michigan.gov

Connect with us | [Michigan.gov/EGLE](https://michigan.gov/EGLE)

From: Stephanie Mullaney <stephanie.mullaney@Compliance-Assurance.com>

Sent: Thursday, April 23, 2026 3:10 PM

To: Switzer, Annette (EGLE) <SWITZERA2@michigan.gov>

Subject: EPA Alternative Method ALT-152A — Request for State Acceptance

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Dear Ms. Switzer,

In 2022, EPA approved the use of a virtual reality (VR) platform for Method 9 smoke school certification under alternative method designation ALT-152.

Compliance Assurance Associates, Inc. (CAA) developed VirtualOpacity®, a VR platform for Method 9 certification that received EPA approval in 2024 as a broadly applicable alternative test method, designated ALT-152A. The ALT-152A designation distinguishes

VirtualOpacity from other VR platforms operating under the original ALT-152 designation. [Read the EPA approval here >](#)

This platform modernizes smoke school training by saving time, offering on-demand convenience, and reducing the carbon footprint of Method 9 certification. Combined with our self-paced online lecture course, it delivers comprehensive Method 9 training in a single online package.

We are asking your agency to officially accept the use of ALT-152A in your state.

Please visit our [agency information page](#) to indicate your acceptance of ALT-152A or to provide feedback. *If we have not heard from your office by May 15, 2026, we will assume your agency has no objection to the use of ALT-152A within your state/jurisdiction.*

Thank you for your time and consideration. Please feel free to contact me if you have questions about VirtualOpacity (ALT-152A).

Respectfully,

Stephanie Mullaney

Marketing and Business Development
Compliance Assurance Associates, Inc.

Phone: 952-925-1569

Email: stephanie.mullaney@compliance-assurance.com