

Bryan Williams<BWilliams@mdeq.ms.gov>

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To:

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Arthur Eberle

Cc:Jaricus Whitlock <jwhitlock@mdeq.ms.gov>

Thu 9/5/2024 1:57 PM

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You forwarded this message on Thu 9/5/2024 2:17 PM

Dear Art, sorry for the delay in getting back to you. Thank you for drawing our attention to the work you have done in setting up a program using an alternative method to Method 9 Section 3.2 certification, for demonstrating visible emissions evaluation. It is evident that you have received EPA approval through third-party verification in a letter dated August 13, 2024, which states "[EPA representative] approve the use of your VR headset-based alternative method for conducting Method 9 plume demonstrations and certification as described in ALT-152." ([eberle-alt-152-response signed-003.pdf \(epa.gov\)](#) under [Broadly Applicable Approved Alternative Test Methods | US EPA](#)).

We at MDEQ have not required any company to obtain our permission to use a federally approved method for compliance. We will remind our inspectors of this and other approved alternative methods are out there for various tests and certifications. We cannot endorse any particular company as they are all free to use the alternative method given that EPA approves their individual program. It is independent from any contract we have. If there is any question on the validity of your program, we will retain the references that you shared with us pertaining to the scope an acceptance by EPA of your program, so there should be no problem with it as far as I can see.

If you have any questions, feel free to contact me.

Sincerely,

Bryan Williams