

JOSH STEIN
Governor

D. REID WILSON
Secretary

MICHAEL ABRACZINSKAS
Director



January 17, 2025

Electronic Transmittal via Email

Arthur Eberle
Chief Executive Officer
Compliance Assurance Associates, Inc.
682 Orvil Smith Road
Harvest, AL 35749

Dear Mr. Eberle:

On October 31, 2024, Joe Spivey, President of Compliance Assurance Associates, Inc., emailed a request to the North Carolina Division of Air Quality (DAQ) to confirm whether it would accept test results using U.S. Environmental Protection Agency (EPA) Method 9, *Visual Determination of the Opacity of Emissions from Stationary Sources* (40 CFR Part 60, Appendix A), where the observer was certified using a virtual reality (VR) headset-based Method 9 training system as described in EPA's broadly applicable approved alternative test method ALT-152¹ published in the federal register on January 25, 2024. On August 13, 2024, EPA issued a letter² that concluded your company's "VR headset-based alternative method for conducting Method 9 plume demonstrations and certification yields observers that are capable of conducting opacity observations with equivalent or better accuracy as observers certified using the existing Method 9 procedures," specifically referred to as ALT-152A. After providing our staff with an in-person demonstration of your VR Method 9 training system on October 18, 2024, along with EPA documentation, DAQ has determined that it will accept Method 9 test results where the observer was certified using ALT-152A.

An electronic copy (ec) of this letter is being provided to you via email unless you specifically request a hard copy. If you have any questions, please contact either me at brian.phillips@deq.nc.gov or Samir Parekh at samir.parekh@deq.nc.gov.

Sincerely,

Brian C. Phillips

Brian C. Phillips
Chief, Technical Services Section
Division of Air Quality, NC DEQ

ec: Joe Spivey – President, Compliance Assurance Associates, Inc.
Taylor Hartsfield – Deputy Director, Division of Air Quality
Samir Parekh – SSCB Supervisor, Division of Air Quality
DAQ Regional Office Supervisors

¹ <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods>

² https://www.epa.gov/system/files/documents/2024-08/eberle-alt-152-response_signed-003.pdf

