

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

 Summarize this email



Stephanie Mullaney

Chasity Miranda

From: Pellegrini, Edward A (DEC) <edward.pellegrini@dec.ny.gov>

Sent: Friday, April 24, 2026 9:26 AM

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

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

As long as the facility representative will still be conducting a valid Method 9 opacity test in the field, it doesn't matter how the individual reader has been certified as long as it's through an approved EPA method. 6 NYCRR 202-1.3(a) (see [View Document - Unofficial New York Codes, Rules and Regulations](#)) allows for any approved technical revisions to any federal reference test methods in 40 CFR Part 60 (which is where Method 9 falls under) to be acceptable to our Department. It's our understanding that EPA has reaffirmed its approval of ALT-152 despite some written challenges.

If you have further questions please feel free to reach out to me.

Edward Pellegrini

Professional Engineer 2

Chief, Enforcement Section

Division of Air Resources, Bureau of Stationary Sources

New York State Department of Environmental Conservation

625 Broadway, 11th Floor, Albany, NY 12233

P: (518) 402-8403 | edward.pellegrini@dec.ny.gov

www.dec.ny.gov |

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

Sent: Thursday, April 23, 2026 3:48 PM

To: dec.sm.DAR.Web <DAR.Web@dec.ny.gov>

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



You don't often get email from stephanie.mullaney@compliance-assurance.com. [Learn why this is important](#)



ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders.

To Whom It May Concern,

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/jurisdiction.

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

✉

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