

From: LUDWICZAK Mark * DEQ <Mark.LUDWICZAK@deq.oregon.gov>
Sent: Tuesday, December 31, 2024 10:51 AM
To: Carla Winkler <Carla.Winkler@AllianceTG.com>
Cc: Max Winkler <Max.Winkler@AllianceTG.com>; Andy Winkler <Andy.Winkler@AllianceTG.com>;
Shamit Nakra <shamit.nakra@AllianceTG.com>; Keith Harris <keith.harris@AllianceTG.com>
Subject: RE: Virtual Opacity classes for Method 9 cert... need your input please!

Hi Carla and Happy New Year to you and the Alliance team!

We are familiar with the Virtual Smoke School training device, although we (DEQ) have not used it. We have had some discussions about it in our monthly EPA STC TEAMS meetings. I don't recall EPA 'approving it', but I will check with Kim Garnett (EPA) for clarification.

EPA has generally been positive about the technology. A few of the concerns that have been expressed in our meeting(s) is that 1) the videos/tests tend to depict the opacity tests in near-ideal conditions (i.e., low -wind, blue-sky background, etc.). Andy and Max can probably attest to some of the conditions that we are tested in by SSI. SSI generally schedules Medford for early March and early September (often the height of our wildfire smoke season). 2) There was some concern that the Virtual Certification couldn't verify the identity of the person taking the test. In other words, if a company had four people to 'certify', one person who was adept at passing the virtual test, could conceivably take the test for each of his/her co-workers.

My recollection is that the EPA thinks that the states should decide how or if to accept the virtual training. I will bring it up at our next (DEQ) STC meeting later in January.

Thanks for the inquiry. I will check into it further.

--Mark