

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

Summarize this email



Stephanie Mullaney
Chasity Miranda

This one was a NO



Stephanie Mullaney
Chasity Miranda

From: Rombough, Kyrik <Kyrik.Rombough@state.sd.us>

Sent: Thursday, April 23, 2026 3:47 PM

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

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

Stephanie Mullaney:

Thank you for reaching out on the alternative test methods / certification requirement for Method 9. **No**, South Dakota **does not** except the VR method 9 certification discussed in ALT-152A. Alt-152A is not a method listed in the sections of the federal CFR that South Dakota has referenced in its regulations for performance testing. Please refer to administrative rules of South Dakota 74:36:11:01.

- **[74:36:11:01](#). Stack performance testing or other testing methods.** All stack performance tests or other test methods must be made in accordance with the applicable method specified in 40 C.F.R. §§ 60.17 and 63.14; Part 60, Appendix A; 40 C.F.R. Part 63, Appendix A; and 40 C.F.R. Part 51, Appendix M (July 1, 2024).

I understand that EPA has approved the ALT-152A through a federal register notice. With stating that, until EPA places that method into the CFR or references the VR technology somehow in Method 9, South Dakota will likely not be able to accept it because we have no federal regulations to cite or to reference in our state regulations.

Kyrik

Kyrik Rombough
Engineering Manager III
SD DANR
Air Quality Program

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

Sent: Thursday, April 23, 2026 2:37 PM

To: Rombough, Kyrik <Kyrik.Rombough@state.sd.us>

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

Dear Kyrik Rombough,

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