

Air Quality Permittees | Clarification regarding EPA Method 9 Certification Requirement

In 2020, with the onset of the COVID-19 pandemic, enforcement discretionary policies and executive orders were issued by both the U.S. EPA and the State of Arizona providing temporary relief for certain compliance challenges. One of these relief measures temporarily waived the obligation for Method 9 Observers to be recertified every 6 months. As these policies are expiring, we would like to clarify that sources must take measures to return to compliance for the Method 9 Observer certification obligation in an expeditious manner.

We recognize that some Permittees may have interpreted Arizona's Executive Order 2020-17 to allow up to **6 months after the order expired** to obtain their Method 9 certification, which is **March 1, 2021**. Since there have not been any extensions to Executive Order 2020-17, all certifications must be current for visible emissions observers by then. If you cannot recertify your staff by March 1, 2021, consider one of the options below, if allowed by your permit:

- Retain certified contractors for visible emissions observations until recertification
- Utilize DOCS (Alternative Method ALT-82) camera technology for visible emission observations

Have questions or need compliance assistance?

Contact David Kim at 602-771-4365 or by e-mail at: kim.david@azdeq.gov.