



GOVERNMENT OF PUERTO RICO
DEPARTMENT OF NATURAL AND ENVIRONMENTAL RESOURCES

August 3, 2020

To: Regulated Community

**Re: Overdue Visible Emission Certification
COVID-19 Pandemia**

On July 22 DNER received a notification indicating that due COVID-19 testing mandates to visit Puerto Rico Eastern Technical Associates (ETA) has no choice but to postpone the program until restrictions are reduced. The DNER recognize the situation caused by the current pandemic restrictions in the island.

In previous discussion with EPA, the federal agency indicated the following: “For the opacity certifications that expire before the next ETA recertification class, EPA has stated that it will recognize the lapse in certification caused by the current pandemic. Since opacity recertification cannot be done online, the VE observers don’t have any other choices. Visible emissions observation can be made after the lapse as long as all Method 9 procedures are followed.” This is consistent with EPA’s COVID-19 Implications for EPA’s Enforcement and Compliance Assurance Program which establish that: “EPA believes that it is more important to keep experienced, trained operators on the job, even if a training or certification is missed.”

Therefore, the DNER will accept opacity lectures from ETA’s 2020 first semester certification until ETA is able to resume the opacity certification program in the island or another provider is available.

Sincerely,

Eng. Luis R. Sierra-Torres
Acting Manager
Air Quality /Area

