

Question 14.3

Topic: DAHS Failure

Question: In case the DAHS fails, is the data captured on a data logger (or other electronic storage device such as the plant distributive control system (DCS) or a PLC)) considered valid if the CEM system is otherwise functional?

Answer: Yes. Since the DAHS must "provide a continuous permanent record" of all measurements and required information, if a source has a device capable of collecting and storing data when the data acquisition system is not functioning properly, then the source has met the intent of the Part 75 rule.

If the analyzer is meeting performance specifications, the data can be stored in this device and the calculations performed later. Missing data procedures are not required in this circumstance. However, a strip chart recorder may not be used for this purpose because the graph produced by the strip chart would require interpretation of data and would not provide the equivalent accuracy that is required.

References: § 75.10(a)

History: First published in Original March 1993 Policy Manual; revised in 2013 Manual