

Question 9.32

Topic: Use of Expired EPA Protocol Gas Cylinder

Question: If it is discovered that an expired EPA Protocol gas cylinder was used to perform a daily calibration error test, linearity check, or the reference analyzer calibration for a RATA or Appendix E test, must those tests be invalidated?

Answer: Not necessarily. To perform any Part 75 calibrations you should always use an EPA Protocol gas cylinder that is within its certification period and has a pressure of at least 100 psig. However, if you inadvertently use an expired cylinder to perform such tests, you may not have to invalidate the tests. The tests may be considered valid if the cylinder has at least 100 psig, and it is successfully recertified under section 2.1.11 of the “EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards” (EPA-600/R-12/531), by an EPA Protocol gas production site that is participating in the EPA Protocol Gas Verification Program (PGVP).

References: §75.21(g)(7); §§ 5.1.4 and 6.5.10 of Part 75 Appendix A; and §§2.1.4 and 2.1.6.3 of the “EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards,” Sept 1997, as amended on August 25, 1999.

Key Words: EPA Protocol gas, calibration gas, calibration error test, linearity check

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