



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711**

**OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS**

March 11, 2024

MEMORANDUM

SUBJECT: Accepted Use of Protocol Gases and the Gases that are Recognized for Regulatory Use

FROM: Richard A. Wayland, Director
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TO: Regional Air and Radiation Division Directors
Regional Enforcement and Compliance Assurance Division Directors

This memorandum provides clarification to the overall status of the U.S. Environmental Protection Agency's (EPA's) Protocol Gas Program and memorandum of February 25, 2022, which was developed jointly from the Office of Research and Development (ORD) and the Office of Air Quality Planning and Standards (OAQPS) regarding EPA Protocol Gas long-term stability requirements. The February 2022 memorandum was intended to address the calibration and quality assurance/quality control of certain monitors for compliance with the National Ambient Air Quality Standards (NAAQS) under 40 CFR Part 50 and 58.

This memorandum recognizes that sulfur dioxide -in-air and nitrogen dioxide -in-nitrogen gas mixtures may be produced and be used as "Protocol Gases" for source measurement and monitoring applications only as allowed under applicable regulations within 40 CFR Parts 59, 60, 63, and 65. If a gas mixture is not currently allowed under the applicable regulations, an owner/operator or Speciality Gas Manufacturer (SGM) may request an alternative protocol assay and certification period for a gas mixture under 40 CFR Parts 59, 60, 61, 63, and 65 through the alternative test method process as described in [GD-22 REQUESTS FOR APPROVAL OF ALTERNATIVES/MODIFICATIONS TO TEST METHODS AND TESTING PROCEDURES](#). EPA encourages those owner/operators or SGMs that plan to make alternative requests to contact us through our website at <https://www.epa.gov/emc/emc-methods-support-directory> prior to initiating a long-term stability study or evaluating existing stability data to discuss the potential

data needs, supporting documentation, and statistical treatment of the data needed for the request.

EPA plans to undertake a new approach for the Protocol Gas Program that is necessary to ensure the Protocol Gas Program meets all programmatic needs and ensures transparency and stakeholder engagement. This will take time to review and update regulations and the EPA Traceability Protocol for Gaseous Calibration Standards (i.e., the Green Book). As we work through this process, an EPA Protocol Gas mailbox has been established (protocol-gas-program@epa.gov) to direct any questions you have regarding the program.

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