

Instructions for the

Preparation of Quality Assurance Project Plans (QAPPs) ~~Interim~~

Instructions

Generic QAPP and Site Specific QAPP Addendum

For

EPA Brownfields Site Assessments and/or Cleanups Projects in the

Southeast

**QUALITY ASSURANCE
PROJECT PLAN UPDATES**

REFRESHER- WHY DO WE NEED A QAPP?

- § Outlines how and why a project involving the collection of analytical data will be conducted, and assures the quality of the data for making environmental decisions.
- § The purpose of a QAPP is to communicate the specifications for implementation of the project design and to help ensure that the data quality objectives are achieved for the project.
- § EPA Region 4 requires that a Generic QAPP must be developed for all Community-Wide Assessment CARs.
 - § SSQAPP Addendums eliminate duplication of tasks that are consistently conducted for all site assessment projects
- § If a CAR has only one site to assess, for example those with a Site-Specific Assessment Grant or Cleanup Grant, there need only be one QAPP prepared for the project.



WHY CHANGE THE OLD QAPP GUIDANCE?

1.0 Introduction

The Environmental Protection Agency (EPA) requires that a Quality Assurance Project Plan (QAPP) be prepared to support all federally funded environmental projects involving the collection ~~and use~~ of environmental data. For EPA's Brownfields ~~program~~ Program, this requirement means that whenever environmental samples are being collected as part of a site assessment or cleanup project, a QAPP must be prepared and EPA-approved by EPA before site-work begins ~~samples are collected~~.

~~EPA Region 4 Brownfields realizes that it takes significant time, effort and money to plan a successful project and capture it in a QAPP. To streamline this process, The EPA Region 4 Brownfields Program has written~~ is providing these instructions ~~Instructions to provide anyone that is planning to help guide you through a Generic QAPP and a Site Specific QAPP Addendum. These instructions provide~~ collect samples with EPA Brownfields funding in Region 4 an overview of the information that should be in a Generic QAPP and Site-Specific QAPP Addendum.

~~If you do not know, These instructions briefly explain each of the basics of why Non-EPA organizations~~ elements that are required in the QAPP. Appendix A and B provides the Checklists that are used by EPA to develop a QAPP-review the Generic QAPP and Site-Specific QAPP Addendums, respectively. The Checklists ensure the plans contain all the required information.

This document is consistent with the following documents ~~may be useful:~~ "EPA Requirements for Quality Assurance Project Plans," (EPA QA/R-5), EPA/240/B-01/003 (March 2001) Reissue Notice May 2006; and "EPA Guidance for Quality Assurance Project Plans" (EPA QA/G-5), EPA/240/R-02/009, (December 2002). ~~The content of EPA Brownfields Region 4 QAPPs shall adhere to "Brownfields Quality Assurance Project Plans (QAPPs) Interim Instructions - Generic QAPP and Site Specific QAPP Addendum For Brownfields Site Assessments and/or Cleanups", most recent version, currently July 13, 2010. In addition, you will find very useful information in Section 6 "References" and Section 7 "EPA Region 4 State Websites". EPA has additional tools that can be found online, for example the Quality Assurance Project Plan Development Tool contains information designed to assist in developing a QAPP that meets EPA requirements for projects that involve surface or groundwater monitoring and/or the collection and analysis of water samples. The online structure of the tool is intended to guide one through the thought process of planning a project, as well as to provide a framework for documenting the plan. The tool is divided into modules and can be found at <https://www.epa.gov/quality/quality-assurance-project-plan-development-tool>. Additional reference documents are listed in Section 6, References.~~

§ Out of date references

§ Broken links to external information

§ References to former EPA staff

§ Use of casual language

§ Incomplete information for certain sections

§ Redundancies in requested information

§ Unnecessarily long checklist



THE QAPP TOOL BOX APPROACH

- § **Instructions for the Preparation of Quality Assurance Project Plans for EPA Brownfields Projects in the Southeast**
 - § Provides detailed explanations for each component of a generic and site-specific QAPP.
 - § This is the document against which your QAPP is reviewed for completeness.

- § **QAPP Example Templates**
 - § Adapted from the checklists used in previous years.
 - § Provide a condensed version of the instructions to help with QAPP design.
 - § Aids in identifying how to structure and word each criteria.

- § **QAPP Checklist**
 - § Four page condensed checklist to be completed and submitted with every QAPP.
 - § Only major items are detailed for each section.
 - § Provides little to no background on each required element.
 - § Not intended to be used as guidance.
 - § Aids EPA in reviewing QAPPs more efficiently.



SO, WHAT'S NEW FOR QAPPS?

§ Document has a new name:

§ Instructions for the Preparation of Quality Assurance Project Plans for EPA Brownfields Projects in the Southeast

§ Clarified when the DAO and PO are the same person

§ New Chapter and Section Titles

§ Removed references to specific contractors

§ Additional references for Phase I/II ESAs

§ Updated the hyperlinks and references

§ Replaced the word “grantee” with “Cooperative Agreement Recipient (CAR)”

§ Additional and/or clarified information required for each QAPP component

But what about the substantive changes???



NEW SECTION: A.7 QUALITY OBJECTIVES AND CRITERIA FOR MEASUREMENT DATA

- § Project Management portion of QAPPs now contain nine items, from A1 to A9
- § Incorporated from the Science and Ecosystem Support Division (SESD)'s QAPP guidance
- § This section is intended to state the project limits both qualitatively and quantitatively
- § The CAR is asked to follow the Data Quality Objectives (DQO) process and apply it the “problem” (Stated in A6)
- § “Guidance on Systematic Planning Using the Data Quality Objectives Process,” (QA/G-4), February 2006



MODIFIED: A.5 PROBLEM DEFINITION

- § Added references to Recognized Environmental Conditions (RECs)
 - § RECs are defined in ASTM E1527-13
- § From the Workplan Template- Consider possible PCB containing materials/sources as RECs.
 - § Should equipment at a site be suspected of containing PCBs, evaluate the need to confirm the presence during phase II sampling

MODIFIED: A.9 DOCUMENTS AND RECORDS

- § Added a reference on complying with applicable grant terms and conditions on records management – Extends to your QAPPS
- § Per the 2018 Assessment and Cleanup Terms and Conditions:
 - “In accordance with 2 CFR § 200.333 the CAR shall maintain records pertaining to the cooperative for a minimum of three (3) years following submission of the final financial report ...”**



MODIFIED SECTION: B.2 SAMPLING AND ANALYTICAL METHODS

- § Section contains one new sentence about investigation derived wastes (IDW).
 - § “Describe how Investigation-derived Waste or IDW will be handled and managed”
- § Important to consider with all assessments and cleanup activities
- § Reference the applicable state and/or federal standards

MODIFIED SECTION: B.4 ANALYTICAL METHODS & REQUIREMENTS

- § Removed reference to the use of non-standard methods (originally only appeared in the checklist)
- § Based on the budget of the grants and typical nature of the assessments/cleanups, non-standard methods are not prudent
 - § Can be reviewed on a case by case basis with you Project Officer



ADDED TEXT: B.9 ANALYTICAL SENSITIVITY & PROJECT CRITERIA

- § Description was missing from the original guidance document
 - § It was listed in the previous checklist
- § Aids in identifying potential concerns with sensitivity in relation to project objectives/criteria.
 - § i.e. is the data point usable, or is more data needed to support a decision or trend in site contamination

RENAMED SECTION D.3: EVALUATING DATA IN TERMS OF USER NEEDS

- § Previously was, “Usability and Project Evaluation”
- § Change in name reflects an emphasis on elevation of the data against the user’s (CAR’s) needs.



WHAT'S NEXT?

- § FFY18 CARs will be required to follow the new QAPP instructions.
 - § Previous CARs may continue using the old format.
 - § All CARs are encouraged to use the abbreviated checklist.

- § Please provide feedback to your Project Officer on the new QAPP Tool Box.
 - § Suggestions can be incorporated into the next revision for FFY19.

- § Future updates to the QAPP instructions will (hopefully) occur more frequently.
 - § Fix broken links, stay up-to-date on referenced documents
 - § Incorporate feedback

- § Watch for a revision to the workplan template to cover asbestos and lead based paint surveys as part of a Phase I.

