

Date: November 19, 2024
10:00 AM-11:00 AM

Agenda Prepared By: Chelsea Glinka, Kaitlynn Morris, Nora Conlon

Place: [Microsoft Teams Meeting](#)

Project No.: 72967.01

Project Name: RAE - SWIG QAPP Technical Assistance: Conference Call with 2024 Grant Awardees to Review QAPP Requirements

Introductions: *Tom Ardito*

Restore America's Estuaries (RAE)

Restore America's Estuaries was selected by the EPA to manage the Southeast New England Program for Watershed Implementation Grants (SWIG) for 2024. RAE will oversee fiscal and technical aspects of the grant project.

Contact: Tom Ardito, Director: tardito@estuaries.org

Environmental Protection Agency (EPA)

EPA is funding the SWIG Program and will conduct the final review and approval of Project QAPPs.

Contacts:

- › Margherita Pryor, SNEP Project Officer: Pryor.Margherita@epa.gov
- › Anthony Pepe, Region 1 Regional Quality Assurance Manager: Pepe.Anthony@epa.gov
- › Bryan Hogan, Quality Assurance Branch Manager: Hogan.Bryan@epa.gov

EPA QA Reviewers:

- › Nora Conlon, Senior Quality Assurance Chemist conlon.nora@epa.gov
- › Carly Boyd: cboyd@epa.gov
- › Lilly Simmons: simmons.lilly@epa.gov
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VHB

VHB's role is to simplify the Quality Assurance Project Plan (QAPP) development process for awardees and provide quality control by coordinating with awardees to review the initial draft QAPPs against EPA QAPP criteria. The goal of this technical support is to make the QAPP development a predictable and simple process.

Contact: Chelsea Glinka: cglinka@vhb.com

Kaitlynn Morris: kwmorris@vhb.com

Overview of Southeast New England Program for Watershed Implementation Grants: *Margherita Pryor*

The SWIG Program targets integrated approaches to water quality and ecosystem restoration. The SWIG Program recognizes that clean water, healthy habitats, resilient ecosystems, and prosperous communities are closely interconnected, and that strong partnerships offer the most effective means of meeting Southeast New England's environmental challenges. The SWIG Program targets water pollution, habitat degradation, and other high-priority environmental issues to foster sustainable coastal and watershed communities.

Any SWIG-funded projects that include primary or secondary data collection (**environmental information operations**¹) require the development of a QAPP as a condition of the grant.

QAPP Overview: *Chelsea Glinka*

A QAPP is a planning document that describes:

- › **Why** you are conducting the proposed project; briefly provide project background and issue(s) to be addressed.
- › **How** you will address the issues outlined above. The Project should be broken down into specific tasks.
- › **Who** is involved in the project; List project partner organizations and describe the specific roles of everyone involved in the project. Be sure to identify a specific person to serve as the Quality Assurance Manager. Ideally, this person should be different from the overall Project Manager.
- › These first three items should be well-documented in your scope of work.
- › Document how quality assurance and quality control will be applied to environmental information operations and assessment to assure that the results obtained are of the type and quality needed and expected. Think about the steps that will be necessary for you to have confidence in the outcome of the project when it is completed (e.g. comparisons between before and after; maintenance and calibration of instruments, etc.)

The success of the project relies heavily on the quality of data (both primary and secondary) collected to inform the project. Any decisions, assessments, or actions that occur as a result of the project should be based on data with established QA/QC criteria.

Importantly, a QAPP is the first task that should be completed as part of your project. The QAPP essentially is the project "blueprint" that lays out how the project will be completed, and describes in detail the necessary QA/QC requirements and other technical activities that must be implemented to ensure that the results of the work you perform will satisfy the performance acceptance criteria. QAPPs should be referenced when addressing QA/QC issues, should they arise. QAPPs are meant to be "working documents" that are to be updated if new QAPP-worthy project components are added.

Why is a QAPP needed?

EPA policy is based on the national consensus standard, ANSI/ASQC E4-1994, *Specifications and Guidelines for Environmental Data Collection and Environmental Technology Programs*. Part B of this standard, *Collection and Evaluation of Environmental Data*, necessitates the development of project-specific QAPPs. Non-EPA organizations funded by the EPA via Assistance Agreement Programs (AAP) to

¹ Note that "environmental information operations" is the new term for "environmental data collection" used in the updated QAPP Standard; this is a broadened term which captures environmental data as a subset of environmental information.

carry out environmental information operations are required to develop a QAPP per 40 CFR 30, 31, and 35. The SWIG Program is an AAP, therefore a QAPP is required as a condition of the funding.

What type of project requires a QAPP?

A QAPP is needed for any project that involves environmental information operations and/or interpretation with a quantifiable element. This applies to projects that include:

1. **Primary data collection:** environmental information operations collected for the exclusive purpose of the proposed project such as water quality sampling, soil sampling, and any other direct field measurements; and
 - 1.1. **Environmental Information Operations:** A collective term for work performed to collect, produce, evaluate, or use environmental information and the design, construction, operation, or application of environmental technology.
2. **Secondary data collection:** any project that will collect, compile, interpret, and/or otherwise use existing datasets for purposes other than which they were originally collected will need to develop a secondary data QAPP. This is necessary to establish data acceptability criteria and to identify limitations of existing data sets. If your project will use only secondary data, then you may use the updated QAPP template but may omit sections that are not relevant.

How should a QAPP be structured?

Depending on the project, one or more of the following QAPP guidance and standards will apply:

1. **Basic/Primary Data Collection Template:** This template follows the updated QAPP standards and guidance. In addition to the [template](#), there is also a [completion checklist](#) and other [supporting documents](#).
2. **Secondary Data Collection:** This guidance follows [EPA New England QAPP Guidance for Environmental Projects Using Existing \(Secondary\) Data, Revision 2 \(October 2009\)](#).
3. **Modeling Guidance:** Meant for projects that will be developing a new model. Guidance for developing a QAPP that concerns modeling is available at [EPA Guidance for QAPPs for Modeling EPA QA/G-5M \(2002\)](#). This is for new models only. Projects that propose to use established models will use the Update QAPP Template and should address why the model was selected, how the inputs were chosen, and how the outputs will be evaluated.

When the EPA is reviewing the QAPP they are looking to see if your project meets the QAPP criteria and to make sure that they can effect change on a project prior to the environmental information operations process. EPA reviewers may have recommendations for how certain quality assurance measures are followed.

EPA QAPP Standards and Guidance Documents: *Nora Conlon*

The EPA maintains its most current standards and guidance documents concerning QAPP development on the [EPA Quality Directives](#) page. The following documents are most pertinent to the QAPP development for the SWIG Program:

- › [QAPP Standards – CIO 2105-S-02.1](#), updated on August 21, 2023 – Provides detail about the minimum requirements for QAPPs prepared by and for EPA. This Standard replaces the longstanding EPA Requirements for Quality Assurance Project Plans (EPA QA/R-5). Much of the Standard's content and requirements for QAPPs has not changed, including core requirements. All new QAPPs must adhere to these new standards, and revisions to existing QAPPs for new work must incorporate these new standards as well.

- › **EPA Region 1 QAPP Guidance** – This document provides specific guidance for the EPA Region 1 QAPP Program and includes a detailed discussion of how guidance has changed. The document outlines the components of the EPA Region 1 QAPP Program, including roles and responsibilities, submission and approval process, and updates/revisions to QAPPs. It also provides an overview of the 23 QAPP Standard elements including specific requirements for projects implemented in EPA Region 1. Finally, the revised guidance includes references, examples, and other resources to assist with project planning and QAPP development. The QAPP templates follow this guidance.

These reference documents and templates are also included within the [SharePoint](#) site and [RAE SWIG](#).

Frequently Asked Questions: *Chelsea Glinka*

Can I use existing QAPPs?

If a project has an existing QAPP (approved within the last five years)² and there have been very minor changes (e.g. funding, schedule) then an amendment to the existing QAPP is acceptable. Reference the QA Tracker number of the existing QAPP that is being amended. If a project has an existing QAPP and there are more extensive changes to the project (such as new team members, project locations, new tasks) then a new QAPP should be developed because it is preferable to have all project updates in one comprehensive document. Refer to [Appendix A of the new QAPP Guidance Document](#) for a Crosswalk between the former QA/R-5 Standards and the new QAPP standards.

If you or a project partner have an existing QAPP that addresses a specific project task (e.g. water sampling) then relevant sections from the existing QAPP can be copied into your new project QAPP. Relevant standard operating procedures (SOPs) from existing QAPPs should be incorporated into the appendix section of your new project QAPP. Overall, these existing pieces should be used as a supplement to your project specific QAPP and not as a replacement.

What if my project includes time-sensitive tasks (e.g. seasonal field work) that needs to be completed before we have a chance to complete the full project QAPP?

If a project spans several tasks you may incorporate them all into one comprehensive QAPP³ or break them up into smaller task-specific QAPPs or sometimes SOP documents. The latter may be appropriate when tasks need to be prioritized according to projected timelines (e.g. projects that will require baseline sampling first).

What if you are incorporating new/additional project activities that are not funded through the SNEP grant?

EPA QAPP requirements apply for environmental information operations funded both by EPA *and* as part of any match to the funded project. If a grantee is going above and beyond the activities described in their funded project, including the match for those activities, the QAPP requirement does not apply to the additional suite of efforts.

When is a QAPP NOT needed?

- › Projects that have only qualitative components (e.g. outreach and education).
- › Typically, if a project is funding only the construction phase (the initial project design likely required a QAPP).

² QAPPs are approved for up to 5 years or the life of the project (if the Project is completed in under 5 years).

³ Projects that include both primary and secondary data collection may be combined into one QAPP under the Primary QAPP template.

- › Sometimes established SOPs may be sufficient if a proposed task is a routine activity for a project proponent – this should be discussed on a case-by-case basis.

QAPP Review Process and Timeline: *Chelsea Glinka*

You should factor in a QAPP review **timeline of 2.5 – 3 months**; the EPA should have the QAPP draft in hand at least 60 days prior to the start of the data collection. The timeline also needs to account for preliminary review by VHB prior to submission to the EPA.

1. Submit draft QAPP to VHB to perform the initial review to check against the [EPA Region 1 QAPP Guidance](#) (May 2024) criteria. Contact: cglinka@vhb.com and kwmorris@vhb.com
2. VHB will review and provide comments and recommended edits generally within two weeks of the receipt of the draft QAPP.
3. Update QAPP and submit revised version to EPA for final review and approval. Submit to Margherita Pryor (Pryor.Margherita@epa.gov) and to R1QAPPs@epa.gov, where it will be assigned to a quality assurance reviewer. Keep Chelsea and Tom cc'd on correspondence. EPA generally takes up to 30 days to perform this initial review, however, EPA policy states that they should have the QAPP in-hand for a minimum of 60 days prior to the start of data collection. This timeline accounts for the time needed by the grantee to address edits prior to finalization and signature collection.
 - 3.1. Important: do not have your project team sign the QAPP before submitting to EPA for final review – signatures should be collected after grantee has addressed edits from EPA.
4. EPA will provide any additional requested edits and will let you know when you should collect signatures from your project team. EPA will be the last to sign to the QAPP.
5. Circulate the final approved QAPP with signatures to your project team, the relevant EPA contacts, Tom Ardito from RAE, and Chelsea Glinka & Kaitlyne Morris from VHB. RAE keeps records of every final QAPP.
 - 5.1. Include updates on QAPP approval process to RAE in your grant progress reports.