

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

## DEC 2 1 2005

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

## **MEMORANDUM**

SUBJECT: OSWER Guidance 9272.0-20: Applicability of the Uniform Federal

Policy for Quality Assurance Project Plans (EPA 505-04-900A)

FROM: James E. Woolford, Director

Federal Facilities Restoration and Reuse Office

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Quality Staff

Office of Environmental Information

**TO:** Regional Science and Technology Directors

The Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP) has been approved by the Office of Solid Waste and Emergency Response (OSWER) and the Department of Defense (DoD) for use at federal facility hazardous waste sites. The purpose of this Memorandum is to inform you that Quality Assurance Project Plans prepared and approved according to the UFP-QAPP meets all the requirements of *EPA Requirements for Quality Assurance Project Plans*, (QA/R-5) issued by the Quality Staff of the Office of Environmental Information.

The Policy is based on the American National Standard *Quality systems for environmental data and technology-Requirements with guidance for use (ANSI-ASQ E4-2004)*, the same National Consensus Standard used for QA/R-5. The UFP-QAPP addresses elements common to all environmental data collection, beginning with identifying environmental decisions that need to be made and determining the type, quantity and quality of data necessary to support those decisions. Environmental decision making can range from proposing a site for addition to the Superfund National Priorities List to determining compliance with a discharge permit. In addition, use of the UFP-QAPP will help to ensure the quality, objectivity, utility and integrity of environmental data as required by the Data Quality Act and Information Quality Guidelines issued by EPA and the Office of Management and Budget<sup>1</sup>.

Heretofore, the primary focus of environmental data quality assessment has been the performance of analytical laboratories. The intergovernmental work group that developed

<sup>&</sup>lt;sup>1</sup> For more information, see <a href="http://www.epa.gov/quality/informationguidelines/index.html">http://www.epa.gov/quality/informationguidelines/index.html</a>

the UFP-QAPP elected to take on topics that had not been addressed in the past, beginning with the adequacy of sampling plan design, through field sampling activities, to data review, with an emphasis on the quality of data, related to the decision that requires environmental data. The diversity of the workgroup members, from the organizations they represented to their individual technical disciplines meant that, while extra effort was required, the end result is both flexible and robust. The value of the UFP-QAPP and its ancillary features are already apparent.

The UFP-QAPP includes implementation support tools. Implementation tools include worksheets that can provide both a consistent format for QAPPs and assurance that necessary requirements are addressed. The UFP-QAPP is currently in use by several EPA Regions for federal facilities as well as other fund lead and responsible party lead Superfund projects, approach and been demonstrated to be helpful and effective in improving QAPP planning and implementation. Use of this tool makes both preparation and review of QAPPs much more efficient and timely. Another, unique, tool is the Quality Assurance/Quality Control (QA/QC) Compendium. The Compendium provides extensive recommendations on QA/QC measures to support various end uses of data, such as for risk assessment. Suitable QA/QC meta-data is a requirement for both objective data review and to meet Information Quality Guidelines criteria.

OSWER's Federal Facilities Restoration and Reuse Office and the Department of Defense have developed a training curriculum on the use of the UFP-QAPP. The training includes a video describing the role of managers in assuring the development and use of appropriate Quality Assurance Project Plans for environmental data collection. Instruction materials consist of two computer-based modules that provide orientation and are a prerequisite for a two day classroom course. The training is provided by the U.S. Navy under an Interagency Agreement and is open to federal and state employees. Contractors may also participate with sponsorship by government contract managers if the training is directly related to the contract statement of work.

The UFP-QAPP and the associated implementation support tools are available at <a href="https://www.epa.gov/fedfac/documents/intergov\_qual\_task\_force.htm">www.epa.gov/fedfac/documents/intergov\_qual\_task\_force.htm</a>. An OSWER Directive on implementation of the Policy is also available on this site. Information on the training course and the schedule are available at:

## https://www.cecos.navy.mil/coursedetail.cfm?CourseID=76

While the initial focus of the UFP-QAPP development was on Federal Facility response actions under CERCLA and RCRA, the potential utility to other programs is clear. We strongly encourage all EPA programs to consider the use of the UFP-QAPP and its ancillary support tools for planning and carrying out environmental data collection. The obligations of EPA and the federal government to provide data that meet the need for quality, objectivity, utility and integrity are well served by the use of the UFP-QAPP.

For additional information or questions, feel free to contact Mike Carter of the Federal Facilities Restoration and Reuse Office, 703-603-0046, email <a href="mailto:carter.mike@epa.gov">carter.mike@epa.gov</a> or the chair of the UFP-QAPP workgroup, Robert Runyon of Region 2, 732-321-6645. email <a href="mailto:runyon.robert@epa.gov">runyon.robert@epa.gov</a>.

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