

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 7 2005

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: OSWER DIRECTIVE 9272.0-17
Implementation of the Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP) at Federal Facility Hazardous Waste Sites

FROM: Thomas P. Dunn
Deputy Assistant Administrator

TO: Regional Administrators, Regions I-X

PURPOSE:

The purpose of this Directive is to transmit the final *Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP)*, and provide guidance to the Regions on this Policy, as appropriate, for all data collection at Federal facility hazardous waste sites.

This Policy is the result of the work of the Intergovernmental Data Quality Task Force (IDQTF), chaired by the Director of the Federal Facilities Restoration and Reuse Office (FFRRO). It reflects significant input from and review by a wide variety of EPA Headquarters offices, by every EPA Regional Office, as well as EPA's partners in this endeavor -- the Department of Defense (DoD) and the Department of Energy (DOE).¹ The Policy is designed to:

¹ The IDQTF includes representatives of the following headquarters offices: OSWER (Office of Superfund Remediation and Technology Innovation, Office of Solid Waste, Federal Facilities Restoration and Reuse Office), Office of Environmental Information (Quality Staff), and Office of Air and Radiation (Office of Radiation and Indoor Air). Although all regions participated on some level, active members of the workgroup came from Regions 1, 2, 3, 5, 6, 7, and 8. In addition, the UFP-QAPP went through two cycles of comprehensive review by all Regions (both Quality Assurance Managers and Hazardous Waste Programs). Finally, all of the military components (Navy, Air Force and Army) participated in the workgroup, as well as representatives from DOE.

- Assure the integration of quality principles in all Federal facility projects that require environmental data collection and use.
- Streamline document preparation, review and approval by:
 - Encouraging involvement of an appropriate multi-disciplinary project planning team in the development of the QAPP
 - Recommending a consistent content and format
 - Establishing an agreed starting point of minimum QA/QC specifications for environmental data collection conducted under CERCLA.
- Save time and money in project execution by assuring that data of appropriate quality are collected to make the decisions required by the project
- Assure consistency with Directives of other federal organizations.

BACKGROUND:

In 1997, a report from the EPA Inspector General (Audit Report No. E1 SKB6-09-004107100132) examined laboratory data quality at a limited number of Federal facility National Priorities List (NPL) Superfund sites. An audit report from the DoD Office of Inspector General (OIG Report 97-098, Laboratory Support Service for Environmental Testing, February 21, 1997) addressed similar issues. These reports found real or perceived inconsistencies and deficiencies in data quality within and across government organizations that resulted in greater costs, time delays, and the potential that some site risks remain unaddressed.

In response to these audit reports related to Federal facilities, at the direction of the Assistant Administrator for OSWER, the Federal Facilities Restoration and Reuse Office convened the first meeting of the IDQTF in the fall of 1997. The focus of the IDQTF is to comprehensively address problems and issues related to the management of environmental data quality at Federal facilities. The consensus mission of the IDQTF is “To document an intergovernmental quality system beginning with the hazardous waste programs.” Two products implement this stated mission.

The first product of the IDQTF - ***Uniform Federal Policy for Implementing Environmental Quality Systems*** (UFP-QS) implements Section 5 of the national consensus standard *Quality Systems for Environmental Data and Technology Programs* (ANSI/ASQ E4) and parallels EPA’s quality system (*Policy and Program Requirements for the Mandatory Agency-wide Quality System, 5360.1.A2, May 2000*). The UFP-QS was signed by the three agencies represented on the IDQTF in January 2003. The second product – ***The Uniform Federal Policy for Quality Assurance Project Plans*** (UFP-QAPP) – implements Section 6 of E4, and was completed by the IDQTF in July 2004. It has been approved by DoD and is consistent with the QAPP requirements outlined in Chapter 5 of EPA Order 5360.1 A2, and EPA’s *Guidance for Quality Assurance Project Plans* (QA/G-5).

Both IDQTF Policies are based on established requirements. The National Technology Transfer and Advance Act and OMB Circular A-119 urge federal departments and agencies to adopt national consensus standards such as ANSI/ASQ E4 when they are suitable. Federal Acquisition Regulation

46.202-4 specifically cites ANSI/ASQ E4 as an acceptable higher level contract quality standard. EPA Order 5360.1 A2 is also based on ANSI/ASQ E4. The Office of the Secretary of Defense is currently in the concurrence process for a DoD Instruction that will require defense components to adopt the UFP-QAPP as the basis for future data collection planning and execution. The DoD Instruction is analogous to an OSWER Directive.

The UFP-QAPP documents were drafted by a subgroup of the IDQTF over the past five years. The point of departure for the UFP-QAPP Manual and associated workbook was the EPA Region 1 QAPP guidance. The UFP-QAPP consists of four related documents.

- Part 1 - UFP-QAPP Manual provides policy on the preparation and implementation of QAPP documents. It sets out steps that address how a QAPP should be prepared, approved and implemented for all environmental data collection projects. It also provides guidance on how to integrate technical and quality control aspects of a project throughout its life cycle, including planning, implementation, documentation, assessment and corrective actions.
- Part 2 of the UFP-QAPP provides supplementary materials for use with the UFP-QAPP Manual:
 - Part 2A, “QAPP Workbook,” contains recommended worksheets that are designed to assist in the preparation of QAPPs by addressing specific requirements of the Manual.
 - Part 2B, “Quality Assurance/Quality Control (QA/QC) Compendium: Minimum QA/QC Activities,” describes minimum QA/QC specifications recommended for CERCLA environmental investigations, depending upon the use of the data. These minimum recommended specifications are designed to facilitate collaboration at sites by promoting a consistent set of specifications that can be tailored by the project team to meet the quality objectives of individual projects. These specifications may be supplemented by additional parameters based on site-specific needs. The basis for these recommended specifications was extensive information collected from EPA Regions, DoD and DOE on existing written QA/QC policies and analysis of the value added nature of the potential range of QA/QC specifications.
 - Part 2C, “Example QAPPs,” provides several sample QAPPs that demonstrate use of the recommended UFP-QAPP worksheets to prepare a QAPP.

IMPLEMENTATION:

Scope

The documents transmitted with this Directive apply specifically at Federal facilities. The UFP-QAPP documents also may be considered more broadly for data collection projects conducted under CERCLA and RCRA. Regions are strongly encouraged to consider the use of the UFP-QAPP for other purposes.

The UFP-QAPP is designated for use in Federal facility projects where environmental data are collected. It has been designed to be applicable for all environmental data collection related to hazardous waste investigations (e.g., for the purpose of cleanup under the CERCLA program and the RCRA corrective action program), as well as data collection related to the active management of hazardous waste generated by RCRA facilities.

For purposes of this Directive, Federal facility projects include all projects for which a Federal agency (e.g., DoD, DOE) or its components are responsible. It includes all Base Realignment and Closure Act (BRAC) related projects, and those Formerly Used Defense Sites (FUDS) or Formerly Used Sites Remedial Action Program (FUSRAP) related projects where the U.S. Army Corps of Engineers is the lead project manager.

The QA/QC Compendium (Part 2B of the UFP-QAPP) was developed for and should be used for CERCLA actions. In many cases, the decisions being made under the RCRA Corrective Action program should be analogous to the decisions of the CERCLA program, and the QA/QC specifications outlined in the QA/QC Compendium should be suitable for RCRA cleanups, as well as CERCLA.

The EPA Regions are asked to immediately begin implementing as appropriate, the UFP-QAPP Manual and its associated documents. Regions should consider:

- Application of the UFP-QAPP (content, outline, and format) to all new QAPPs and substantially revised QAPPs.
- Application of the minimum QA/QC specifications to CERCLA actions
- Encouragement of the use of the UFP-QAPP tools to facilitate and streamline review of QAPPs.

Compliance with the UFP-QAPP (form, content, and minimum QA/QC specifications) will be considered to be adequate conformance with EPA's QA/G-5 and any Regional guidance on the preparation of QAPPs. The UFP-QAPP supersedes existing Region-specific QAPP guidance for Federal facility hazardous waste activities. The Regional EPA office remains responsible for ensuring that the content of the QAPP provides a quality of data suitable to the needs of the specific project for which it was prepared.

The UFP-QAPP is a voluntary standard that has been approved by the Department of Defense. The Department of Energy is in the process of considering formal adoption and FFRRO will encourage other agencies to use the UFP-QAPP. Implementation of the UFP-QAPP is the responsibility of those Departments upon adoption and is not subject to notices of violation (NOV). Implementation will be phased in by the other Departments depending on the requirements of procurement actions and other factors.

FFRRO will be evaluating implementation of the UFP QAPP. Performance evaluation measures and tools will be transmitted to Regional Superfund and RCRA Division Directors in the near future by the Director of FFRRO.

Implementation Assistance:

Several tools have been jointly developed by EPA and DoD to assist in the implementation of the UFP-QAPP. A training program on the UFP-QAPP has been developed and pilot tested at four EPA Regions. It will be offered periodically (see the FFRRO Web site for future opportunities). Electronic worksheets to facilitate preparation of QAPPs based on the UFP-QAPP are available on the FFRRO Web site http://epa.gov/fedfac/documents/intergov_qual_task_force.htm, as are all the documents referenced in this Directive.

CONCLUSION:

The UFP-QAPP is the product of an extensive collaborative effort by management and working level EPA, DoD and DOE personnel. It was created to address the real and perceived inconsistencies and deficiencies in data quality that result in greater costs, time delays, and the potential for response actions that result in unaddressed risk. The UFP-QAPP employs a graded approach designed to encourage a level of detail consistent with the scope and complexity of the project. It is a tool that can be used cost-effectively for many different projects.

If you have any questions about the UFP-QAPP or its implementation, please contact:

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Attachment

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