Quality Assurance Guidance Manual

Environmental Protection Agency

Mid-Atlantic Region (Region 3) Brownfields & Redevelopment Section

Version 1.0 September 2025

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Acronyms

ACM	Asbestos Containing Material
ASQAB	Applied Science and Quality Assurance Branch
CA	Cooperative Agreement
CAR	Cooperative Agreement Recipient
CFR	Code of Federal Regulations
DC	District of Columbia
DNREC	Delaware Department of Natural Resource and Environmental Control
DOEE	Washington DC Department of Energy and Environment
EPA	United States Environmental Protection Agency
FSP	Field Sampling Plan
HASP	Health and Safety Plan
HAZWOPER	Hazardous Waste Operations and Emergency Response
LBP	Lead Based Paint
MDE	Maryland Department of Environment
MOA	Memorandum of Agreement
OSHA	Occupational Safety and Health Administration
PADEP	Pennsylvania Department of Environmental Protection
PAQ	Property Approval Questionnaire
PCP	Presumptive Conformance Program
PO	Project Officer
PPE	Personal Protective Equipment
QA	Quality Assurance
QAM	Quality Assurance Manager
QAPP	Quality Assurance Project Plan
QAPrP	Quality Assurance Program Plan
QC	Quality Control
QMP	Quality Management Plan
R3	Region 3 or Mid-Atlantic Region
SAWP	Sampling and Analysis Workplan
SOP	Standard Operation Procedure
VADEQ	Virginia Department of Environmental Quality
VCP	Voluntary Cleanup Program
VRP	Voluntary Remediation Program
WVDEP	West Virginia Department of Environmental Protection

I. Introduction

This guidance manual is intended to provide an overview of the quality assurance (QA) requirements and processes applicable to cooperative agreement recipients (CARs a.k.a "grantees") of the U.S. Environmental Protection Agency (EPA) Mid-Atlantic Region (R3)'s Brownfields and Redevelopment Section (Brownfields Section). QA is an integral component of EPA's mission and the projects it funds through cooperative agreements (CA). Organizations utilizing grant funds provided by the EPA for the purpose of Brownfields redevelopment are required to implement quality systems that conform with the stipulations of the EPA Environmental Information Quality Policy and Procedure, EPA Quality Management Plan Standard, EPA Quality Assurance Project Plan Standard, and the individual grant terms and conditions dictating their scope of work. The purpose of a quality system is to ensure that the environmental information is verifiable, defensible, and appropriate for environmental decision making.

EPA R3's QA policy states that, "***All*** *environmental information* ***collected*** *or* ***used*** *must be of known and documented quality; suitable for their intended use; with all aspects of collection, analyses, or use thoroughly documented; and such documentation being verifiable and defensible*." This policy applies to all environmental information-related activities performed directly by or for R3, including all environmental information from outside sources used by R3, including Federal, State, Tribal and local partners. EPA CARs support this mission by ensuring that the projects conducted using funds from an EPA-awarded grant follow these policies.

This manual will detail the specific options available, and State-specific guidance, for meeting the QA policy requirements of your CA. Refer to the Terms and Conditions of your CA for the specific requirements of your award. If you have further questions, need clarification, or have suggestions to improve this manual, please reach out to your EPA Brownfields Project Officer (PO).

II. Overview of EPA Quality Assurance Documents

EPA uses its Quality System to manage the quality of its environmental information collection, generation, and use. The primary goal of the Quality System is to ensure that our environmental information is of sufficient type, quantity, and quality to support the data's intended use. Organizations collecting environmental information on behalf of or using funds provided by the EPA are required to generate quality systems that comply with stipulations set by R3's Quality System.

EPA's Quality System recognizes a graded approach to QA, acknowledging that one size does not fit all. Organizational and programmatic quality needs vary with their resources and specific objectives.

A good Quality System can provide numerous benefits, including:

- Decisions can be made with confidence,
- Easier to defend the quality of data if challenged/litigated,
- Ensures comparable data,
- Immediate identification of problems and quick corrective action,
- Reduction of significant data loss,

- Provides consistency in operations and is a beneficial tool to train new staff on their responsibilities,
- Provides detailed documentation and allows for efficient audits and assessments,
- Reduces potential for major findings.

Brownfields CARs must have a quality system in place to conduct their projects when environmental information is collected. There are several important documents associated with a successful quality system. Quality system documents that are commonly associated with Brownfield CAs are described in this section. The specific quality documents required for each CA will depend on program or project scope of work, the purpose, and intended use of the data. These documents include:

- Quality Management Plans (QMP),
- Quality Assurance Project Plans (QAPP),
- Quality Assurance Program Plans (QAPrP),
- Field Sampling Plans (FSP),
- Sampling and Analysis Workplan (SAWP),
- Health and Safety Plans (HASP),
- Standard Operating Procedures (SOP).

A. Quality Management Plan

The QMP is an organization or program-specific document; it describes the general practices of an organization or program. Technical assessment related details of individual sites/projects of the organization or program are documented in a QAPP or QAPrP (*see next section for more information on developing QAPPs/QAPrPs*).

Thus, the QMP may be viewed as the "umbrella" document under which individual projects are conducted.

A QMP documents how an organization will manage, plan, implement, and administer continuous improvement over the lifecycle of a project or program to ensure the effectiveness of the Quality System Specifically, it describes how organizations structure their:

- quality program,
- the quality policies and procedures,
- areas of application,
- and roles, responsibilities, and authorities.

EPA released an updated QMP Standard in January of 2023. The new standard more clearly defines the expectations for extramural partners and should be referenced when drafting your QMP. QMPs are valid for up to five years and must be reviewed by the CAR annually to ensure the stakeholders information is still accurate. An organization may use the same QMP for multiple CAs if it has not expired and the stakeholder information is still accurate. A CAR will submit their QMP to their EPA Brownfields PO who will provide a technical review and ultimately coordinate a review by R3's Applied Science and Quality Assurance Branch (ASQAB).

A QMP is required for every CA and this document must be approved by ASQAB before work can proceed. Environmental information collection cannot be initiated until an EPA approved QMP is in place. Project or program activities that do not involve the collection or use of environmental information, such as purchasing, can be initiated prior to QMP approval.

The QMP standard can be found on EPA's webpage by following this link: QMP Standard

B. Quality Assurance Project Plans and Quality Assurance Program Plans

A QAPP or QAPrP is a written document that provides a blueprint for the entire project (QAPP) or program (QAPrP), respectively, and specific tasks to ensure that the project produces reliable and defensible data that can be used to meet the project's overall objectives and goals. EPA requires QAPPs for all projects that collect and use environmental information.

CARs will decide to develop their own site-specific QAPP (one plan for a singular site), a program-specific QAPrP (one plan for multiple sites supported by site-specific field sampling plans) or adopt a pre-approved state QAPrP (one plan for multiple sites in a specific state supported by site-specific field sampling plans). These options are discussed in further detail below in **Section III**.

Refer to R3's *Quality Assurance Document Type Comparison* table in **Appendix A** and consult with your PO to select the most appropriate option for your site(s) or program.

Quality Assurance Project Plan (QAPP)

A QAPP is a formal planning document which describes how projects are planned, implemented, documented, and assessed during the life cycle of a project. QAPPs describe in comprehensive detail the necessary QA/QC requirements and other technical activities that must be implemented to ensure that the results of a project will satisfy the stated performance and acceptance criteria. QAPPs detail the complete spectrum of quality and technical requirements put forth in EPA's QAPP Standard.

QAPP's have a project-level focus and may be used for an individual or one-off project and include field sampling information specific to that project thus eliminating the need for a separate Field Sampling Plan as detailed in Section C. **A QAPP is appropriate when it will be used assessment or cleanup activities at a single site.**

Quality Assurance Program Plan (QAPrP)

A QAPrP is a formal planning document which describes *an organization's* policies regarding planning, implementation, documentation, and assessment that remain constant across different projects within a program and shall be supported by activity- or site-specific supplementary documents. QAPrPs describe the standards and procedures necessary for Quality Assurance and Quality Control (QA/QC) that must be implemented to ensure that the program outputs will satisfy the pre-determined performance and acceptance criteria. **A QAPrP is appropriate when it will be used for programs that conduct multiple projects that have similar and consistent activities and QA elements (i.e., Community-Wide Assessment Grants).** A QAPrP must be supported by activity- or site-specific documentation for each project (i.e., field sampling plan).

The EPA released an updated QAPP standard in July of 2023 that more clearly defines the expectations for external partners and should be referenced when drafting your QAPP or QAPrP. A grantee will submit their QAPP/QAPrP to your EPA Brownfields Project Officer who will coordinate the document's review by EPA's Quality Assurance team and must be approved by EPA before work can proceed.

QAPP or QAPrPs are valid for up to five years and must be reviewed annually by the CAR. Submit a revised QMP to your PO when any significant changes are identified during the annual review.

The QAPP standard can be found on EPA's webpage by following this link: QAPP Standard

QAPP vs. QAPrP Summary

In summary, QAPPs are meant to be project specific documents that contain all necessary information to complete the sampling **at a single specific site** and are most appropriate for Brownfields Cleanup Grants. QAPrPs are meant to support assessment **of multiple sites and must be supplemented by a FSP to document site specific sampling information** (i.e., sampling locations, specific analytes etc.)

C. Field Sampling Plan (FSP)

A FSP is a site- or activity-specific document supported by a higher-level QA document such as a QAPrP, and describes the number, type, and location of samples, the type of analyses, media to be sampled, etc. Since FSPs are supplementary documents to a QAPP/QAPrP, any information that was deferred or otherwise not included in QAPP/QAPrP must be included in the FSP. FSPs should be written so that the reader is able to successfully implement the project. FSPs are valid for the life of the project but should be continually reviewed by the project team and revised if or when the scope of work is changed. A grantee will submit their FSP to an EPA Brownfields PO who will review the document and request revisions or submit it to ASQAB for final approval; **the FSP must have a final approval by ASQAB prior to sampling fieldwork can proceed**.

FSPs should clearly explain the steps taken when planning the project. There should be an easy to follow, logical pathway that links:

- The site history to the contaminants of potential concern,
- The contaminants of potential concern to the sampling methodology,
- The sampling methodology to the analytical procedures,
- The sampling strategy and analytical procedures to data quality objectives of the project.

D. Standard Operating Procedures (SOPs)

A SOP is a set of written instructions that document a routine or repetitive activity followed by an organization to complete a specific task. They document the way activities are to be performed to facilitate consistent conformance to technical and quality system requirements and to support data quality objectives. They may describe, for example, fundamental programmatic actions and technical actions such as analytical processes, and processes for maintaining, calibrating, and using equipment. SOPs are intended to be specific to the organization or facility whose activities are described and assist that organization with maintaining their quality system processes and ensure compliance with governmental regulations. SOPs can be provided as attachments to the QAPP, QAPrP or FSP.

E. Health and Safety Plan (HASP)

A site-specific HASP must be completed prior to implementation of field work. Site-specific project personnel must be added or modified as needed, and the plan must provide a location for emergency services closest to the site. All on-site personnel shall have completed 40-hour health and safety training, with annual refresher, in accordance with 29 CFR 1910.120 **and/or** equivalent training to facilitate the

type of inspections covered in this guidance. Occupational Safety and Health Administration (OSHA) requires the use of personal protective equipment (PPE) to reduce employee exposure to hazards when engineering and administrative controls are not feasible or effective in reducing these exposures to acceptable levels. The HASP should be provided with the QAPP or FSP and a copy must be included in the appendix of the final report.

III. Brownfields Specific Quality Assurance Procedures

This section details the procedures to establish a QA program for your CA. As previously mentioned, CARs must submit their QA related documents including a QMP, QAPP or QAPrP and supporting FSPs to EPA for approval prior to conducting assessment or cleanup activities. The QA document requirements, document review procedures, and document review timeframes agreed upon by the Brownfields Section and ASQAB are memorialized in a memorandum of agreement (MOA) dated February 22, 2022 (**Appendix B**).

EPA R3's QA program allows CARs to adopt state-specific QAPrPs where available. Utilizing these previously approved state QA documents is encouraged and can expedite review periods in most circumstances. These options which are available in your state/district are discussed in further detail in this section below in **Section III.B**.

A. Quality Management Plan (QMP) Reviews

All QMPs will be subject to the standard review period from R3 ASQAB which is 45-days. Draft QMPs should be sent to your Brownfields PO for an initial technical review. Once the comments provided by your PO are addressed (if any), they will submit the QMP to ASQAB for final review and approval using their online submission tool. ASQAB will provide an official review memorandum to the CAR and PO when their review is complete. **Please note that CARs should not submit documents directly to ASQAB. Your Brownfields PO will submit documents when they are ready for ASQAB's review.**

QMPs are valid for five (5) years from the date of EPA approval. The target turnaround time for QMP reviews is 45 days for the initial review and 15 days for subsequent revisions. Document review statuses are discussed further below in **Section III.C**.

B. QAPP/QAPrP/FSP Reviews

There are 3 review options available in R3 which vary based on the state the project is located:

- **Standard Document Review –** A site-specific QAPP or program specific QAPrP with supplemental FSPs are submitted by the PO to ASQAB for standard 45-day review period for each document.
- **Non-Presumptive Conformance Program (Non-PCP) –** CARs provide organizational information and sign a MOA adopting a state-specific QAPrP. Subsequent Site-specific FSPs are submitted to EPA for review and eligible for the expedited 7-day review period.
- **Presumptive Conformance Program (PCP) –** CARs adopt a state QAPrP and meet certain conditions to allow the state to review FSPs. Approvals are provided by your specific state agency. ASQAB does not approve FSPs when using this option.

Review the table below and consult with your EPA PO to select the most efficient and appropriate option for your project.

State / Agency	Standard Review	Non-PCP Review	PCP Review
Delaware / DNREC	✓	✓	** in process*
Maryland / MDE	✓	✓	✗
Pennsylvania / PADEP	✓	✓	✗
Virginia / VADEQ	✓	✓	✗
Washington DC / DOEE	✓	✗	✗
West Virginia / WVDEP	✓	✓	✓

The specific requirements for each state's program are discussed below in **Section V**.

Standard Document Review

The standard document review option is available for all Brownfield's CARs in R3; however, this option is associated with the lengthiest review timeframes. When using the standard review option, the CAR will send their draft documents to their PO for an initial review. The PO will provide any comments or suggested edits to the CAR, if applicable. Once all comments from the PO are addressed, the PO will submit the document to ASQAB for final approval. The standard review timeframe is 45-days for each document.

Non-Presumptive Conformance Program (Non-PCP)

EPA R3 ASQAB recognizes that in instances of considerable overlap between CAR policy and state policy there is a level of expediency that can be achieved by adopting state level EPA-approved QAPrP. Through the Non-PCP process of adoption, efficiency can be enhanced without compromising conformance with EPA's Quality System.

Since no two organizations will function exactly alike, each organization is required to submit their own form of QA documentation. Under this proposal, CARs can adopt their state's procedures and are only required to submit information to EPA on any of the CAR's procedures that vary from those presented by the state.

To enter the Non-PCP, CARs should contact their PO and request a copy of their state's QAPrP to review, and then review the QAPrP Adoption section of this guidance document(**Section III.C**).

Presumptive Conformance Program (PCP)

The Presumptive Conformance Program (PCP) is a voluntary and conditional agreement between EPA and state VCPs/VRPs that utilize EPA grant funds and are enrolled in the program. The program includes a streamlined QA process that permits these organizations, who have enhanced, EPA-approved QAPrPs, to begin work immediately upon submission of site-specific FSPs, related to Brownfield site assessments

and cleanups, without formal EPA approval. Prior to submission of the FSP to EPA, the associated state agency will review the FSP as described in the next section. FSPs submitted under this program are presumed to satisfy EPA's QA requirements without immediate review and verification. However, such presumptions of QA conformance can be rescinded any time based on subsequent reviews and verifications by EPA.

The PCP provides CARs with an additional option to meet their CA's Quality System requirements. The PCP option is currently only available in West Virginia. In addition to the EPA approved QAPrP, the West Virginia Department of Environmental Protection (WVDEP) and EPA have signed a MOA that allows grantees to adopt this QAPrP and enter the PCP if all conditions are met. If accepted into the program, the CAR submits their site-specific FSPs to WVDEP; WVDEP reviews the FSP and provides an approval decision. The approved FSP is then shared with EPA to archive. This process shortens the QA timeframe for CARs by eliminating the development of a QAPP/QAPrP and the state review period is generally shorter than for EPA review. Please note, the time it takes for state review is dependent on their workloads and availability. While the turn-around time for a state review of a FSP is generally shorter, EPA cannot guarantee that state review periods will always happen more quickly.

R3's Brownfields Section and ASQAB are working to bring the PCP option to other states in the region. This manual will be updated when additional options become available.

C. State-Specific QAPrP Adoption

CARs will decide whether to develop their own QAPP/QAPrP or to adopt an existing state-specific QAPrP. If a CAR chooses to adopt a state QAPrP, they will sign a MOA with EPA stating that they agree to adopt and implement the requirements of the state QAPrP. If a state-specific approved QAPrP is adopted, the CAR must comply with all requirements of that QAPrP. While the grantee is then able to follow the EPA approved QAPrP, each FSP must still reference the CAR's QMP as appropriate, as each entity is required to have their own QMP and cannot utilize a state's QMP. In states where an EPA-approved QAPrP is not in place (DC), CARs will need to develop their own site-specific QAPP or program-specific QAPrP with supporting FSPs as needed.

The most appropriate option for your CA will depend on the scope of your project, project schedule, and your ability to comply with the sampling and analysis requirements established in the QAPrP. Consult with your Brownfields PO to make the most appropriate selection for your project. If a CAR is interested in adopting a state QAPrP, they must request approval from the state to add their project to the QAPrP. If the state agrees, the CAR will sign a MOA with EPA.

Additional details of the PCP and Non-PCP are included in the MOAs which are provided in the following Appendices:

Appendix C – Non-Presumptive Conformance Program Memorandum of Agreement. July 6, 2023.

Appendix D – Presumptive Conformance Program - Memorandum of Agreement between the State VCPs and 104(k) Grant Fund Recipients for Adoption of Quality Assurance Program Plan. July 10, 2023.

Appendix E – Presumptive Conformance Program for Section 128(a) Grant-funded FSPs. July 10, 2023.

D. QA Document Review Status

Following the submission of a QA document to EPA, an official review memorandum will be provided to the submitter after an initial review of the document has been completed. The memorandum will indicate whether the document has been approved, conditionally approved, or requires resubmission:

- **Approval** – Environmental information operations may occur as documented with signed memorandum and QA document.
- **Conditionally approved** – Environmental information operations may begin while minor deficiencies are being resolved. The document must be resubmitted to address the minor deficiencies within the timeframe noted in the memo, typically within 30 days of receiving the conditionally approved memorandum.
- **Resubmission Required** – No environmental information operations may begin. The document must be revised and resubmitted and be either approved or conditionally approved before operations can begin.

When a QA document has been approved, the CAR should:

- Distribute the document to project personnel as outlined in the QMP and QAPP
- Ensure the QAPP is accessible during project activities, including field work.
- Retain the original as an official record.
- Remember to document data collection and project activities.

State-specific QA options and estimated timeframes for reviews are discussed further in **Section V**.

IV. Quality Assurance Guidance for Hazardous Building Materials

Additional policies have been developed for asbestos, lead, and radon site assessments as detailed below.

A. Assessing for Hazardous Materials in Building Structures

This environmental assessment activity memorandum provides CARS with guidance on quality assurance requirements for conducting asbestos containing material (ACM) surveys, lead-based paint (LBP) inspections, mold contaminated materials surveys, and radon testing within building structures at sites that are being evaluated for redevelopment. These procedures support future redevelopment plans by providing CARs with accurate cost estimates for addressing hazardous building materials, mold, and radon in preparation for redevelopment activities.

While a formal EPA-approved FSP is not required for these assessments, CARs must follow all applicable federal, state, or local regulations, policies, and guidelines. Should contamination requiring remediation be identified during initial surveys, an EPA-approved QAPP is required before continuing further activities. The memorandum only applies to assessment of hazardous building materials, mold, and radon. It does not apply to assessment of other media (e.g., soil, groundwater, sediment, etc.).

CARs must also submit a "Property Approval Questionnaire (PAQ) for Hazardous Substances" to the EPA PO before starting site-specific assessments to ensure that the planned work is documented and compliant with regulations. The CAR should note in the form that these surveys or inspections will be conducted in addition to other environmental site assessment or planning efforts at the site.

CARs are required to prepare a site-specific HASP before conducting fieldwork. These plans must include emergency response protocols, personnel roles, and OSHA training and equipment requirements, including 40-hour HAZWOPER training with annual refresher and proper use of personal protective equipment (PPE).

All activities performed with federal funds must be properly documented in a final report submitted to EPA Region 3, with a copy of the HASP included in the appendix of the report.

Asbestos Survey

- Surveys must conform to all applicable regulations pertaining to asbestos demolition surveys, including: 40 CFR Part 61, 29 CFR 1926.1101, and **all applicable State and Local Regulations**

- A state-licensed asbestos inspector must conduct the survey in accordance with EPA methods and Occupational Safety and Health Administration (OSHA) regulations as well as any additional state requirements.

- Additional information about asbestos, training, and finding certified labs can be found on EPA's asbestos webpage: EPA Asbestos

Lead Inspections

- Lead-Based Paint (LBP) Inspections must conform to the Work Practice Standards for Conducting Lead-Based Paint Activities

- A state-licensed lead inspector must conduct the survey in accordance with EPA methods and state regulations.

- Additional information regarding lead hazards can be found on EPA's lead webpage: EPA Lead

Mold Survey

- Buildings are typically surveyed by experienced environmental field sampling technicians/personnel for visible mold growth. A CAR should consult with state and local authorities regarding requirements for training and certification of mold investigators.

- Mold investigations are an eligible EPA Brownfield activity for sampling and remediation, and a grantee can consult EPA's website EPA Mold for additional information

- The OSHA guidance document, "A Brief Guide to Mold in the Workplace" provides recommended guidelines when working with mold contaminated materials. The full document can be found on OSHA's webpage: A Brief Guide to Mold in the Workplace

Radon Testing

- Testing follows the protocols set by the American Association of Radon Scientists and Technologists, "Protocol for Conducting Radon and Radon Decay Product Measurements in Multifamily Buildings" (ANSI-AARST MAMF-2012, Section III, or similar section in the most recent addition). Radon Testing must be performed under the direct supervision of a Radon Professional, certified by the American Association of Radon Scientists and Technologists (http://aarstnrpp.com/wp/) National Radon Proficiency Program or the National Radon Safety Board (http://www.nrsb.org/).

- A state-licensed radon tester must conduct the survey in accordance with any EPA methods and state regulations.

- Additional information regarding radon can be found at EPA Radon.

B. Process

1. Submit a **Property Approval Questionnaire (PAQ) for Hazardous Substances** to the EPA Project Officer before initiating any site-specific assessments.

2. Prepare a site-specific HASP in compliance with OSHA standards. Include the HASP as an appendix in the final report.

3. Ensure all activities comply with federal, state, and local regulations, and document all work in the final report submitted to EPA.

V. State Specific Guidance

The state environmental agencies within the Mid-Atlantic Region have differing policies and options established which will ultimately determine the review options for your QA documents. The state-specific policies and options are detailed in this section.

A. Delaware

The currently available QA review options for Delaware include:

- Standard
- Non-PCP

A flow chart summarizing the process is available in **Appendix G1**.

Standard Program: The standard program involves submitting all QA-related documents to the PO. The PO will submit the document to ASQAB for review and approval. . The review period for each document is 45-days. Please note that a QMP must be submitted to ASQAB prior to any QAPP/QAPrP/FSP can be submitted. These documents can be reviewed concurrently; however, sampling may not proceed until both the QMP and associated QAPP/QAPrP/FSP(s) are approved. Exceptions may be granted for cleanup sites involving hazardous building materials only and/or sites without extensive sampling requirements.

Non-PCP: Request a copy of Delaware's QAPrP and the adoption MOA from your PO to begin using the Non-PCP option in Delaware. Review the documents to ensure your organization is able meet the requirements. Sign the MOA, attach the program specific information requested, and send to your state contact (see below) for signature. Email the fully executed MOA to your PO. The program-specific information that should be added to the agreement, at minimum, includes:

- Organizational information and personnel responsibilities,
- Organizational distribution list,
- Communication pathways and lines of reporting,
- Organization specific reporting requirements.

Once the MOA is signed you will submit site-specific FSPs to your PO for submission to ASQAB. The review period for Non-PCP FSPs is seven (7) days.

DNREC Contact Information: Qazi Salahuddin

Qazi.Salahuddin@delaware.gov

B. Maryland

The currently available QA programs options for Maryland include:

- Standard
- Non-PCP

A flow chart summarizing the process is available in **Appendix G1**.

Standard Program: The standard program involves submitting all QA-related documents to the PO. The PO will submit the document to ASQAB for review and approval. . The review period for each document is 45-days. Please note that a QMP must be submitted to ASQAB prior to any QAPP/QAPrP/FSP can be submitted. These documents can be reviewed concurrently; however, sampling may not proceed until both the QMP and associated QAPP/QAPrP/FSP(s) are approved. Exceptions may be granted for cleanup sites involving hazardous building materials only and/or sites without extensive sampling requirements.

Non-PCP: Request a copy of Maryland's QAPrP and the adoption MOA from your PO to begin using the Non-PCP option in Maryland. Review the documents to ensure your organization is able meet the requirements. Sign the MOA, attach the program-specific information requested, and send to your state contact (see below) for signature. Email the fully executed MOA to your PO. The program specific information that should be added to the agreement, at minimum, includes:

- Organizational information and personnel responsibilities,
- Organizational distribution list,
- Communication pathways and lines of reporting,
- Organization specific reporting requirements.

Once the MOA is signed you will submit site specific FSPs to your PO for submission to ASQAB. The review period for Non-PCP FSPs is seven (7) days.

MDE Contact Information: Barbara Krupiarz
barbara.krupiarz2@maryland.gov

C. Pennsylvania

The currently available QA review options for Pennsylvania include:

- Standard

- Non-PCP

A flow chart summarizing the process is available in **Appendix G1**.

Standard Program: The standard program involves submitting all QA-related documents to the PO. The PO will submit the document to ASQAB for review and approval. . The review period for each document is 45-days. Please note that a QMP must be submitted to ASQAB prior to any QAPP/QAPrP/FSP can be submitted. These documents can be reviewed concurrently; however, sampling may not proceed until both the QMP and associated QAPP/QAPrP/FSP(s) are approved. Exceptions may be granted for cleanup sites involving hazardous building materials only and/or sites without extensive sampling requirements.

Non-PCP: Request a copy of Pennsylvania's QAPrP and the adoption MOA from your PO to begin using the Non-PCP option in Pennsylvania. Review the documents to ensure your organization is able meet the requirements. Sign the MOA, attach the program specific information requested, and send to your state contact (see below) for signature. Email the fully executed MOA to your PO. The program specific information that should be added to the agreement, at minimum, includes:

- Organizational information and personnel responsibilities,
- Organizational distribution list,
- Communication pathways and lines of reporting,
- Organization specific reporting requirements.

Once the MOA is signed you will submit site specific FSPs to your PO for submission to ASQAB. The review period for non-PCP FSPs is seven (7) days.

PADEP Contact Information: John R. Gross
johngross@pa.gov

D. Virginia

The currently available QA programs options for Virginia include:

- Standard
- Non-PCP

A flow chart summarizing the process is available in **Appendix G1**.

Standard Program: The standard program involves submitting all QA-related documents to the PO. The PO will submit the document to ASQAB for review and approval. . The review period for each document

is 45-days. Please note that a QMP must be submitted to ASQAB prior to any QAPP/QAPrP/FSP can be submitted. These documents can be reviewed concurrently; however, sampling may not proceed until both the QMP and associated QAPP/QAPrP/FSP(s) are approved. Exceptions may be granted for cleanup sites involving hazardous building materials only and/or sites without extensive sampling requirements.

Non-PCP: Request a copy of Virginia's QAPrP and the adoption MOA from your PO to begin using the Non-PCP option in Virginia. Review the documents to ensure your organization is able meet the requirements. Sign the MOA, attach the program specific information, and send to your state contact (see below) for signature. Email the fully executed MOA to your PO. The program specific information that should be added to the agreement, at minimum, includes:

- Organizational information and personnel responsibilities,
- Organizational distribution list,
- Communication pathways and lines of reporting,
- Organization specific reporting requirements.

Once the MOA is signed you will submit site specific FSPs to your PO for submission to ASQAB. The review period for non-PCP FSPs is seven (7) days.

VADEQ Contact Information: Cortney Marquette
cortney.marquette@deq.virginia.gov

E. Washington, DC

The standard program is currently the only option available in Washington, DC. The standard program involves submitting all QA-related documents to the PO. The PO will submit the document to ASQAB for review and approval. . The review period for each document is 45-days. Please note that a QMP must be submitted to ASQAB prior to any QAPP/QAPrP/FSP can be submitted. These documents can be reviewed concurrently; however, sampling may not proceed until both the QMP and associated QAPP/QAPrP/FSP(s) are approved. Exceptions may be granted for cleanup sites involving hazardous building materials only and/or sites without extensive sampling requirements.

F. West Virginia

The currently available QA programs for West Virginia include:

- Standard
- Non-PCP
- PCP

A flow chart summarizing the process is available in **Appendix G2**.In West Virginia, grantees have additional options to comply with QA requirements of their grant. WVDEP has an EPA-approved QAPrP in place; in addition, WVDEP and EPA have a special Memorandum of Agreement (MOA) that allows grantees to adopt this QAPrP and enter the Presumptive Conformance Program (PCP). This means that a grantee in West Virginia can choose to adopt the WVDEP QAPrP for their project and do not need to create their own. A grantee in West Virginia utilizing the PCP is only required to have the WVDEP review the FSP and the approved FSP will be archived by the USEPA, which will be subject to the standard audit process if selected. However, sampling cannot proceed until the WVDEP approves the FSP.

Standard Program: The standard program involves submitting all QA-related documents to the PO. The PO will submit the document to ASQAB for review and approval. . The review period for each document is 45-days. Please note that a QMP must be submitted to ASQAB prior to any QAPP/QAPrP/FSP can be submitted. These documents can be reviewed concurrently; however, sampling may not proceed until both the QMP and associated QAPP/QAPrP/FSP(s) are approved. Exceptions may be granted for cleanup sites involving hazardous building materials only and/or sites without extensive sampling requirements.

Non-PCP: Request a copy of WVDEP's QAPrP and the adoption MOA from your PO to begin using the Non-PCP option in West Virginia. Review the documents to ensure your organization is able meet the requirements. Sign the MOA, attach the program specific information, and send to your state contact (see below) for signature. Email the fully executed MOA to your PO. The program specific information that should be added to the agreement, at minimum, includes:

- Organizational information and personnel responsibilities,
- Organizational distribution list,
- Communication pathways and lines of reporting,
- Organization specific reporting requirements.

Once the MOA is signed you will submit site specific FSPs to your PO for submission to ASQAB. The review period for non-PCP FSPs is seven (7) days.

PCP: After being accepted into the PCP, the grantee will submit their FSP(s) to WVDEP; WVDEP will review the FSP and provide an approval decision. The approved FSP will be shared with EPA to archive.

This process shortens the QA timeframe for CARs by eliminating the development of a QAPP/QAPrP and the state review period is generally shorter than for EPA review. Please note, the time it takes for state review is dependent on their workloads and availability. Please note that EPA cannot guarantee the length of state review periods.

There are a few conditions that must be met for a grantee in West Virginia to be able to utilize the approved WVDEP QAPrP. These conditions are:

- The site must be enrolled into the state led Voluntary Remediation Program (VRP)
- The grantee QAM, state QAM, and EPA Region 3 ASQAB Representative sign the must sign the PCP MOA
- The grantee must agree to adopt and conform to the state EPA-approved QAPrP
- The state must review and approve the FSP following their own practices
- The FSP must be submitted to EPA for inclusion in the project records

WVDEP Contact Information: Ross Brittain
Ross.A.Brittain@wv.gov

Appendices

Appendix A – R3 Quality Assurance Document Type Comparison Table

Appendix B – Memorandum of Agreement and Quality Assurance Review Guidance for the Land, Chemicals, & Redevelopment Division's Brownfields & Revitalization Branch and the Laboratory Services & Applied Science Division's Applied Science & Quality Assurance Branch. February 28, 2022.

Appendix C – Non-Presumptive Conformance Program Memorandum of Agreement. July 6, 2023.

Appendix D – Presumptive Conformance Program - Memorandum of Agreement between the State VCPs and 104(k) Grant Fund Recipients for Adoption of Quality Assurance Program Plan. July 10, 2023.

Appendix E – Presumptive Conformance Program for Section 128(a) Grant-funded FSPs. July 10, 2023.

Appendix F – ACM, LBP, Mold, Radon Guidance and Quality Assurance Requirements for Asbestos Surveys, Lead-based Paint Inspections, Mold Surveys, and Radon Testing in Building Structures. January 20, 2023.

Appendix G – State-Specific Flow Charts

G1 – Delaware, Maryland**,** Pennsylvania, Virginia Process Charts
G2 - West Virginia Process Flow Charts

Appendix H – Pre-Submittal Quality Assurance Document Review Checklist

Appendix A

R3 Quality Assurance Document Type Comparison Table

EPA Region 3 Quality System

QUALITY ASSURANCE DOCUMENT TYPE COMPARISON TABLE

The purpose of this table is to highlight the contrasts between different document types, thereby informing the preparer what is expected for each, and, by extension, inform which type is best suited to the preparer's needs. The items presented below are taken directly from the EPA's Quality Assurance Project Plan Standard. For more information on the specific requirements for individual elements, please reference the Quality Assurance Project Plan Standard. Upon submission to EPA, the document will be assessed upon the presence and acceptability of the elements for the respective document type as seen below.

Group A: Project Management and Information/Data Quality Objectives	**QAPP**	**QAPrP**	**FSP**
A1 – Title page including the document title, name of organization, date of preparation, name of organization preparing the document (if different from the organization performing the work), period of applicability, and version number.	☑	☑	☑
A2 – Approval page including signature lines for the operations manager, quality assurance manager, EPA project officer, and EPA delegated approving official (DAO).	☑	☑	☑
A3 – Table of contents listing the location of sections, tables, diagrams, charts, and appendixes.	☑	☑	☑
A4 – Project purpose, definition, and background information.	☑	✓[1]	☑
A5 – Project task description which details the work to be performed, the products to be produced, and the schedule for implementation.	☑	×	☑
A6 – Information/Data Quality Objectives and performance/acceptance criteria which address the adequacy of information needed for the project outputs to be acceptable.	☑	✓[2]	☑
A7 – Distribution list listing individuals and their organizations who must receive copies of the approved document and any subsequent information.	☑	☑	☑
A8 – Project organization information detailing the individuals and organizations participating in the project along with their roles and responsibilities.	☑	☑	✓[3]
A9 – Project Quality Assurance Manager independence statement acknowledging the organizational independence of QA from the unit generating the work.	☑	☑	×
A10 – Project organization chart and communications displaying the lines of authority, reporting, and communication both within the organization and between contracted/subcontracted agencies.	☑	☑	✓[4]
A11 – Personnel training/certification information detailing the minimum qualifications, education, training, and knowledge required for the work to be performed.	☑	☑	×
A12 – Documents and records that will be generated in the project and the document retention policy/procedures.	☑	☑	×
Group B: Implementing Environmental Information Operations	**QAPP**	**QAPrP**	**FSP**
B1 – Identification of project environmental information operations to be conducted.	☑	✓[5]	☑
B2 – Methods for environmental information acquisition. Methods are identified by version number and citation.	☑	☑	☑
B3 – Integrity of environmental information to include procedures for sample handling and custody and laboratory identification.	☑	☑	×
B4 – Quality control information including the type, number, and frequency of quality controls sampling.	☑	✓[6]	☑
B5 – Instrument/equipment calibration, testing, inspection, and maintenance types and procedures that will be used in the project.	☑	☑	×
B6 – Inspection/acceptance of supplies and services that will be used in the project.	☑	☑	×
B7 – Environmental information management practices detailing the path of the environmental information from its generation to its final use or storage.	☑	☑	×
Group C: Assessment, Response Actions and Oversight	**QAPP**	**QAPrP**	**FSP**
C1 – Assessments and response actions.	☑	☑	×
C2 – Oversight and reports to management including responsibilities, report type, and report frequency.	☑	☑	×
Group D: Environmental Information Review and Usability Determination	**QAPP**	**QAPrP**	**FSP**
D1 – Environmental information review policies and procedures describing how and when data will be verified and validated.	☑	☑	×
D2 – Useability determination describing how the project outputs will be reconciled with the project goals.	☑	☑	×

KEY: ☑ = Always Required, ✓ = contextually required, × = not required

QA Documents must be approved prior to any data collection work or use, except under circumstances requiring immediate action to protect human health and the environment or operations conducted under police powers.

Quality Assurance Programmatic Plan (QAPrPs) - QAPrPs define and document type and quality of data and methods required for collecting, analyzing, and assessing data to support decisions across recurring or like activities within a single program. QAPrPs shall describe the QA elements that remain constant among the different projects, activities, or sites. Most QAPrPs shall be supported by project-specific, activity-specific, or site-specific documentation (e.g., FSPs, Work Plans, inspection checklists, or equivalent). These documents shall address specific QA elements articulated in EPA's QA/R-5 (QAPP requirements) and QA/G-5 (QAPP guidance) documents and are unique to each project, activity, or site. QAPrPs and supporting documents undergo technical reviews for accuracy, completeness, and compliance with programmatic guidance.

Quality Assurance Project Plan (QAPP) - describe in detail the necessary QA, QC, & other technical activities for projects. R3 policy requires results of the systematic planning process be documented in a QAPP or equivalent QA document approved by authorized personnel (e.g., DAO) prior to implementation. The level of detail found in the QAPP shall be commensurate with the nature of the work being performed and intended use of the data (i.e., graded approach). If a particular QAPP element does not apply to the project, the element must be included and an explanation describing why it does not apply. QAPP requirements apply to all environmental data operations, including existing data, conducted by regional staff or through grants, cooperative agreements, contracts, IAs, and compliance orders.

Field sampling plan (FSP) – project, site or activity specific companion quality document, supported by a quality assurance project plan which describes project objectives, sampling locations and rationales for their selection, sampling methods, analytical methods, preservation, chain-of-custody and shipping requirements. A FSP will contain quality control acceptance criteria for field samples but may or may not contain this information for laboratory analyses. (Note: for FSPs, some items will be missing from this checklist since should be detailed in the programmatic QAPP (i.e., QAPrP, generic QAPP).

R3 Quality Resources
https://www.epa.gov/quality/managing-quality-environmental-data-epa-region-3
https://www.epa.gov/quality

[1] The project purpose and background are generally site specific information. However, programmatic information detailins why the program is being established should still be included.
[2] Data quality objectives and acceptance criteria are inherently site specific criteria. However, the programs policy on how these elements willl be implemented on a site specific basis should still be included.
[3] Required only when the organization performing the work detailed in the FSP differs from the organization that wrote/is described in the QAPrP.
[4] Required only when the organization performing the work detailed in the FSP differs from the organization that wrote/is described in the QAPrP.
[5] The environmental operations planned will differ, potentially greatly, on a site by site basis. However, information should still be included describing the types of operations expected to be performed under the program.
[6] The quality control practices should be catered to suit the needs of the individual projects. However, information should still be included describing the organizations policy pertaining to quality control.

Appendix B

Memorandum of Agreement and Quality Assurance Review Guidance for the Land, Chemicals, & Redevelopment Division's Brownfields & Revitalization Branch and the Laboratory Services & Applied Science Division's Applied Science & Quality Assurance Branch. February 28, 2022.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

DATE: February 28, 2022

SUBJECT: Memorandum of Agreement and Quality Assurance Review Guidance for the Land, Chemicals, & Redevelopment Division's Brownfields & Revitalization Branch and the Laboratory Services & Applied Science Division's Applied Science & Quality Assurance Branch

FROM: Kia Long, EPA Region 3 Quality Assurance Manager, Applied Science & Quality Assurance Branch, Laboratory Services & Applied Science Division (3LS10)

TO: EPA Region 3 Land, Chemicals, & Redevelopment Division, Brownfields & Revitalization Branch (3LD50) and EPA Region 3 Brownfields Cooperative Agreement Recipients

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Introduction

The purpose of this memo is to memorialize the quality assurance (QA) document requirements, document review procedures, and document review timeframes agreed upon by the Brownfields & Revitalization Branch (BRB) and the Applied Science & Quality Assurance Branch (ASQAB a.k.a. ASQA). It also serves as guidance to assist EPA Project Officers, EPA Project Managers, and EPA Region 3 Brownfields Cooperative Agreement Recipients (CAR a.k.a. "grantees") with project planning by detailing QA document requirements and the QA document review process.

Background

Land, Chemicals, & Redevelopment Division (LCRD) Brownfields & Revitalization Branch activities generally fall within four categories for which QA documentation is required:

1. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) § 104(k)
2. CERCLA § 128(a)
3. EPA's Targeted Brownfields Assessment (TBA) program
4. Asbestos Surveys, Lead-based Paint Inspections, Mold Surveys, and Radon Testing for building structures at sites being evaluated for possible brownfield redevelopment

QA Document Requirements and Review Timeframes

For all types of review, a QA Document Review Request Form must be submitted to R3_QA@epa.gov with a pre-submittal checklist and information about any overarching QA documents in place for the project.

1. CERCLA § 104(k)
    a. Grantees must have an EPA-approved Quality Management Plan (QMP), which can be compiled by either the CAR or the CAR's contractor but must be reflective of the CAR's organization. QMPs are valid for 5 years from the date of EPA

approval. The target turnaround time for QMP reviews is 45 days for the initial review and 15 days for subsequent revisions.

b. Project-specific QA documents are required for each site. Project-specific documentation may consist of either a Quality Assurance Program Plan (QAPrP) with Field Sampling Plans (FSPs) for each site or standalone Quality Assurance Project Plans (QAPPs). EPA Region 3 has developed a QAPrP and QAPP template to assist grantees and contractors with document preparation, which ensures completeness and facilitates review. For either option, the requirements for QA plans detailed in *EPA QA/R-5, EPA Requirements for Quality Assurance Project Plans* must be met.

   i. QAPrP & FSPs - In the case of community-wide assessment grants with multiple sites or contractors performing work on behalf of multiple grantees, a QAPrP detailing programmatic QA activities that are the same for every project may be submitted. Once an approved QAPrP is in place, site-specific FSPs detailing the sampling activities for each site may be submitted. The target turnaround time for QAPrP reviews is 45 days for the initial review and 15 days for subsequent revisions. Once approved, the QAPrP is valid for the life of the project, up to five years. After technical review by the Brownfields Project Manager, the target turnaround time for FSPs submitted under an approved QAPrP is 10 business days for FSPs that do not deviate from the QAPrP and 15 business days for FSPs with deviations.

   ii. QAPPs – For projects focusing on one site, or as an alternative to a QAPrP with FSPs for multiple sites, QAPPs may be submitted for each site. The target turnaround time for QAPP reviews is 45 days for the initial review and 15 days for subsequent revisions

2. CERCLA § 128(a)

   a. States must have an EPA-approved Quality Management Plan (QMP). QMPs are valid for 5 years from the date of EPA approval. The target turnaround time for QMP reviews is 45 days for the initial review and 15 days for subsequent revisions.

   b. States must submit site-specific QA plans, either a QAPrP with FSPs or site-specific QAPPs, for EPA review and approval. For either option, the requirements for QA plans detailed in *EPA QA/R-5, EPA Requirements for Quality Assurance Project Plans* must be met. Site-Specific FSPs will undergo technical review by the Brownfields Project Officer using a checklist developed by ASQA. The target turnaround time for QAPrP and QAPP reviews is 45 days for the initial review and 15 days for subsequent revisions. Once approved, QAPrP and QAPPs are valid for the life of the project, up to five years. The target turnaround time for FSPs submitted under an approved QAPrP is 10 business days for FSPs that do not deviate from the QAPrP and 15 business days for FSPs with deviations.

3. EPA's Targeted Brownfields Assessment (TBA) program

   a. EPA’s contractor has an EPA-approved QMP and QAPrP in place for this program.

   b. Site-Specific FSPs will undergo technical review by the Brownfields Contracting Officer’s Representative (COR) using a checklist developed by ASQA. After technical review, ASQA has a target turnaround time of 10 business days for FSPs that do not deviate from the QAPrP and 15 business days for FSPs with deviations.

4. Asbestos Surveys, Lead-based Paint Inspections, Mold Surveys, and Radon Testing for building structures at sites being evaluated for possible brownfield redevelopment

    a. A formal EPA-approved FSP is not required for these types of assessments. However, all quality assurance and quality control procedures and requirements in any applicable federal, state, or local regulation, policy and guidance must be followed. If any of these initial surveys and inspections reveal contamination that requires subsequent remediation and removal, or if other contaminants of concern are present at the site, then an EPA-approved QAPP is required before the start of any activity. This does not apply to soil-related activities.

    b. Although an EPA-approved FSP is not required for these types of assessments, other documentation including but not limited to Health and Safety Plans and survey/sampling reports is required. For further guidance, please refer to the Brownfields & Revitalization Branch's *Guidance and Quality Assurance Requirements for Asbestos Surveys, Lead-based Paint Inspections, Mold Surveys, and Radon Testing in Building Structures* (January 2022)

Other Considerations

1. Consistent with R3's QMP, only those QA documents from Brownfields grants that involve EPA funds or that utilize secondary data on which EPA recommendations and decisions will be based, will be reviewed by the QA cadre in ASQA. There is no requirement for ASQA to review QA documents from the following:

    a. EPA-funded grants for which no data collection will be undertaken

    b. State brownfields actions wholly funded by non-EPA sources

2. Consistent with the foregoing, ASQA will review and approve all incoming Brownfields QA documents sent to R3 for review.

3. ASQA will not use QA document reviews to leverage a "second look" at grants or QAPPs already approved by EPA, irrespective of which EPA program rendered those approvals.

4. QMPs, QAPrPs, and QAPPs will be subject to a 45-day turnaround time upon QA receipt. FSPs under an approved QAPrP will be subject to a target turnaround time of 10 business days for FSPs that do not deviate from the QAPrP and 15 business days for FSPs with deviations.

5. BRB will perform technical reviews of FSPs for completeness, programmatic compliance and administrative elements before submitting these documents to ASQA for the shortened 10-day review timeframe.

6. ASQA will provide weekly reports to BRB with all reviews in progress and the expected completion date. ASQA will alert BRB of any potentially late reviews

Appendix C

Non-Presumptive Conformance Program Memorandum of Agreement. July 6, 2023.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1600 John F. Kennedy Blvd. Philadelphia, PA 19103-2029			
Subject	Memorandum of Agreement between the State VCPs and 104(k) Grant Fund Recipients for Adoption of Quality Assurance Program Plans	**Internal Document Identification Number**	A0003.0
From	EPA Region 3 Quality Assurance Manager, Applied Science & Quality Assurance Branch, Laboratory Services & Applied Science Division (3LS10)		

Memorandum of Agreement between the State VCPs and 104(k) Grant Fund Recipients for Adoption of Quality Assurance Program Plans

Pursuant to Chief Information Officer (CIO) directive *Environmental Information Quality Policy* pertaining to EPA's Environmental Information Quality Policy, organizations performing work on behalf of or funded by the agency are required to develop, implement, and maintain a quality program. EPA's programmatic requirements as they pertain to quality assurance documentation and reporting are detailed in *EPA Requirements for Quality Assurance Project Plans EPA QA/R-5*. Prior to the initiation of environmental operations that involve the collection or use of environmental information, a written quality assurance plan must be submitted to and approved by the EPA.

In certain circumstances, there may be a large degree of overlap between the policies and procedures of multiple organizations if said organizations are guided by the same set of regulations. Such circumstances may arise in projects performed under CERCLA 104(k) agreements. In order for a site whose contamination has been characterized to enroll in its respective state's voluntary cleanup program (VCP), the site must meet criteria established by state law. Consequently, the guiding principles that are applied to the site, both prior to and following VCP enrollment, may align with state procedures.

EPA R3 Applied Science and Quality Assurance Branch (ASQAB) recognizes that in instances of considerable overlap between 104(k) grantee policy and state policy there is a level of expediency that can be achieved by adopting state level EPA approved quality assurance program plans (QAPrP). Through the process of adoption, redundancy can be reduced without compromising conformance with EPA's quality system.

Since no two organizations will function exactly alike, each organization is required to submit their own form of QA documentation. Under this proposal, 104(k) grantees could adopt their state's procedures, and only submit to EPA the procedures that do not fully align with the state. This agreement and the deviations from state policy

will be documented by completing and signing the memorandum below (Appendix A). Program specific information that should be included in the agreement, at minimum, includes:

- Organizational information and personnel responsibilities
- Organizational distribution list
- Communication pathways and lines of reporting
- Organization specific reporting requirements

This agreement does not remove the requirement for site-specific sampling information to be submitted to EPA R3 for review and approval. It is the responsibility of the grantee to submit site-specific documents that comply with the requirements set forth in *EPA Requirements for Quality Assurance Project Plans EPA QA/R-5* and any stipulated described in the QAPrP they are adopting.

EPA is not involved in the brokerage or maintenance of this agreement. The agreement is between states and 104(k) grantees within their jurisdiction. EPA will recognize and honor the agreement only to the extent that EPA quality requirements are met. Should it be discovered by any means that a 104(k) grantee is not conforming to the procedures that it adopted, EPA ASQAB will no longer acknowledge the agreement, and the 104(k) grantee will be required to draft and submit to EPA for approval their own QAPrP.

This plan does not have any legally binding effect, does not create legal rights or obligations, nor does it alter the requirements for organizations receiving grant funding from the US EPA as they pertain to EPA's quality system.

Appendix A

Memorandum of Agreement between the State VCPs and 104(k) Grant Fund Recipients for Adoption of Quality Assurance Program Plans

This agreement between a state-led voluntary clean-up program (VCP) and an organization that conducts operations involving the collection or use of environmental information which are facilitated by funds received under a 104(k)-grant agreement is intended to expedite the process through which EPA's information quality requirements are addressed by allowing 104(k) grantees to adopt their state's EPA approved quality assurance program plan (QAPrP).

Chief Information Officer (CIO) directive *Environmental Information Quality Policy* (or most recent version) dictates that in order to support EPA's mission to protect human health and the environment and to ensure environmental information operations, products, and services are of known and documented quality for their intended use that all organizations funded by or performing work on behalf of the agency create quality assurance project plans that reflect the output of the systematic planning process.

To remain in compliance with the *Environmental Information Quality Policy* directive (or most recent version), a quality assurance document that addresses all aspects of *EPA QA/R-5 EPA Requirements for Quality Assurance Project Plans* must be produced and approved by EPA R3 Applied Science and Quality Assurance Branch (ASQAB). This document must be specific to the organization and accurately reflect the policies and procedures of the organization as they relate to EPA's quality policies. However, EPA R3 ASQAB recognizes that 104(k) grantee practices often have a high degree of overlap with the policies put in place by their state's VCP.

To expedite the QA process, ASQAB will accept a 104(k) grantee's adoption of their state's QAPrP as a surrogate to the composition, submission, and approval of their own internal QAPrP. For this adoption to be valid, the state whose QAPrP is being adopted must consent to make available to the 104(k) recipient any QA resources (e.g. the QAPrP) that are applicable to the grantee's quality system and to keep the 104(k) grantee apprised of any changes to the state's quality system. The 104(k) grantee who is adopting the QAPrP must attest that they have read and understood what they are adopting, follow the practices of any documents that they are attesting to follow, document and report to EPA any state VCP practices that they don't intend to/fail to comply with, provide to EPA documentation explaining the procedures that are being followed in lieu of the state's procedures should such procedures exist, and that they will continue to prepare and submit site-specific field sampling plans which detail all information required by the EPA quality system that is not included in the adopted QAPrP.

No site-specific environmental information operations can be conducted, regardless of the adoption of a QAPrP, until approval of a site-specific plan is issued by EPA R3 ASQAB. EPA will only recognize this agreement in the circumstances that the aforementioned criteria are upheld. A signed copy of this agreement must be submitted to EPA along with the site-specific plan for it to be applicable. This agreement is only valid from the time that signatures are received from both parties until the expiration of the state's QAPrP or significant change in the state's QAPrP prompts them to resubmit to EPA R3 QA. Failure from either party to honor their respective responsibilities will invalidate this agreement. Should circumstances arise in which the agreement is invalidated, it will be the responsibility of the 104(k) grantee to develop, submit to, and have approved by ASQAB their own internal QAPrP before any further environmental information operations may proceed.

If there are any policies from the state's QAPrP that 104(k) recipient does not intend to comply with, they must be detailed in the space below.

By signing this document, the grantee/VCP is attesting that they have read, understood, and intend to comply with conditions set forth in this agreement.

_____	_____
State VCP Quality Assurance Manager/Date	104(k) Grantee Quality Assurance Manager/Date

Appendix D

Presumptive Conformance Program - Memorandum of Agreement between the State VCPs and 104(k) Grant Fund Recipients for Adoption of Quality Assurance Program Plan. July 10, 2023.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1600 John F. Kennedy Blvd. Philadelphia, PA 19103-2029			
Subject	Presumptive Conformance Program for Section 104(k) Grant-Funded FSPs	**Internal Document Identification Number**	A0002.0
From	EPA Region 3 Quality Assurance Manager, Applied Science & Quality Assurance Branch, Laboratory Services & Applied Science Division (3LS10)		

Presumptive Conformance Program for Section 104(k) Grant-Funded FSPs

INTRODUCTION

This Presumptive Conformance Program (PCP) is a voluntary and conditional agreement for an abbreviated Quality Assurance process which permits delayed verification of consistency of site-specific Field Sampling Plans (FSPs) prepared for Brownfields site assessments and cleanups conducted by communities and stakeholders that utilize EPA's Section 104(k) grant funds who have entered into an agreement with their state-led voluntary cleanup programs (VCPs) to adopt and conform to the state led VCP's EPA-approved Quality Assurance Program Plans (QAPrPs). This proposal would allow 104(k) grant recipients to forego the approval process of their own internal QAPrP provided that they sign an attestation to adopt and conform to the state-led VCP's EPA-approved QAPrP. The proposal would further allow 104(k) grant recipients to submit site-specific Field Sampling Plans for sites enrolled in their state's VCP that are presumed to satisfy EPA's QA requirements to EPA without immediate review and verification. These FSPs will carry rescindable presumptions of conformance with EPA's Quality Policy allowing work to proceed after their receipt by EPA. Such presumptions of QA conformance, however, can be rescinded any time based on subsequent reviews and verifications by EPA.

SCOPE

This PCP applies to any organization utilizing 104(k) grant funding for Brownfields assessments or cleanup who have entered into a formal written agreement with both the US EPA and their state's VCP to adopt and conform to the QAPrP, policies, and procedures of the state's VCP. This PCP does not apply if any party withdraws or fails to provide their consent or if the grantee fails to conform to the stipulations described herein.

ENROLLMENT

Enrollment in the PCP is voluntary and conditional. Following the enrollment of a 104(k) recipient into their state's VCP, the grantee's quality assurance manager (QAM), the state VCP's QAM, and the

EPA Regional Quality Assurance Manager (RQAM) or Delegated Approving Official (DAO) must sign a memorandum of agreement (MOA) (Appendix A) and attestation that all parties understand and consent to participation of the QAPrP subscription, document submission, document review, and document approval processes. Only upon signature from all parties will FSPs be eligible under this agreement. Documents submitted before the agreement is put in place or following the termination are not eligible for this program.

Grantees may remain enrolled in the PCP so long as conformance with the EPA's quality system is maintained and there is no change in the grantee or state quality systems that requires EPA review. Upon the end of a five-year state VCP QAPrP approval period, the PCP will expire along with the QAPrP, and must be renewed along with EPA approval of the resubmitted QAPrP. Approval of the state VCP's QAPrP does not automatically reenroll 104(k) grantees into the program. 104(k) grantees are required to review any changes in the state's QAPrP prior to reenrollment.

PROCEDURE

Grantees are responsible for ensuring work funded by EPA meets EPA's QA requirements. EPA's Quality Policy requires a record of sampling and analysis planned and performed by grantees for funded projects. To qualify for the PCP, 104(k) grantees must be enrolled in their state's VCP. As part of the enrollment, the grantee agrees to adopt and conform to the state's QAPrP, and the state agrees to perform a review and issue approval of the grantee's FSPs following their internal procedures. FSPs that are not for sites enrolled must be submitted to EPA R3 and are subject to the standard review and approval process.

The EPA quality system requires all quality assurance documents to accurately reflect the expected work and QA practices to occur over the lifespan of the project. The grantee is required to read and understand the QAPrP that they are adopting. If the state's QAPrP does not accurately reflect the anticipated practices of the grantee's project, then any deviations must be detailed in the site-specific FSP. If there is a systemic deviation from the QAPrP that is expected to span multiple projects, then those deviations are required to be clearly defined in the PCP enrollment agreement (Appendix A).

In order for the PCP to be applicable, the grantee must submit all FSPs for sites enrolled in the VCP for which delayed verification of consistency is requested to their state for review and approval. Upon state approval, the EPA project officer will submit the FSP to R3 QA along with a copy of the state's approval memo and a copy of the MOA signed by the grantee, state, and EPA. Any FSPs for non-

VCP sites submitted directly to the EPA without state review will be reviewed by EPA within the standard review period of 45 days.

All FSPs submitted under this program that are consistent with the foregoing will be submitted to EPA. The decision to review immediately upon receipt will be made at the discretion of regional quality assurance manager and Applied Science and Quality Assurance Branch (ASQAB) of EPA Region 3. FSPs not immediately reviewed by EPA would be presumed to be consistent with EPA's Quality System. EPA would issue receipt confirmation memo with document title and QA document control number (DCN) by email within two business days. EPA's receipt of an FSP would not equate to EPA approval, but after receiving EPA's confirmation memo, the grantee could proceed with work covered by the FSP.

At its discretion, EPA will regularly review any or all submitted FSPs under the PCP to monitor conformity with EPA's Quality System. If these assessments reveal systemic or gross nonconformance with EPA's QA requirements, EPA will require corrective measures and the state VCP in question could be withdrawn from the program.

Findings during the review of a document will be classified as either a major finding or minor finding. Major findings are defined as any deficiency that could adversely affect data quality. Examples include failure to include data quality objectives (DQOs) that sufficiently supplement the generalized DQOs from the QAPrP, failure to include DQOs at all, missing or inappropriate quality control, or the selection of an inappropriate analytical method. Minor findings are described as deficiencies that will not reasonably affect data quality. Examples include omissions of R-5 required elements such as a table of contents, distribution list, or policies on secondary data for projects that don't utilize secondary data.

The grantee and the state will be notified of all findings regardless of classification. Upon notification, the grantee will be required to implement a corrective action and preventive action (CAPA). The scale of the CAPA should be proportional to the finding. An open line of communication will be maintained between the EPA and the grantee to facilitate this process and to help ensure nonconformities do not reoccur. The grantee and the state maintain the right to appeal any findings uncovered during an audit. No action towards removal from the program shall occur until the appeal is resolved. Should the appeal demonstrate that the finding was incorrect or otherwise inconducive towards ensuring quality under the PCP, then no further action will be required by the grantee. Should the appeal fail to demonstrate the forementioned, then corrective and preventative actions will need to be

implemented. Failure to adequately implement a corrective or preventative action is grounds for removal from the PCP.

Upon the discovery of a finding, a retrospective programmatic investigation, which may include comprehensive review of any or all other documents submitted by the grantee in question, will be initiated to delineate the scale and magnitude of the problem. If the finding is determined to be severe or widespread enough that multiple projects have been affected by it, and the scale of said finding(s) are such that they cannot be addressed through corrective action, then the PCP will be rescinded for the grantee in question. States will receive notification if a grantee who adopted their QAPrP is removed from the program. If the finding is isolated to a single project, then response will depend upon the finding’s severity. If the finding is minor, the grantee will be notified, but no further action will occur unless the attempted corrective action and preventative actions prove insufficient to address the problem.

Appendix A

Region 3 Quality System

EPA Region 3

Laboratory Service and Applied Science Division
Applied Science and Quality Assurance Branch

Memorandum of Agreement between the U.S EPA and 104(k) Grant Fund Recipients for Enrollment into the Presumptive Conformance Program

This presumptive conformance program (PCP) is an agreement between the U.S. EPA Region 3 Quality Assurance and Applied Sciences Branch (ASQAB), a state-led voluntary cleanup program (VCP), and organizations that conduct operations involving the collection or use of environmental information which are facilitated by funds received under a 104(k) grant agreement. The program allows for the archival of Field Sampling Plans (FSPs) through the rescindable presumption of conformance with EPA's Quality Policy in the circumstance that the grant recipient adopts and conforms to their state's VCP quality assurance program plan (QAPrP) and the state VCP agrees to oversee the grantee's environmental operations quality assurance following their own established practices. Only organizations that meet the aforementioned criteria are eligible to enroll in this PCP.

EPA's *Environmental Information Quality Policy* dictates that in order to support EPA's mission to protect human health and the environment and to ensure environmental information operations, products, and services are of known and documented quality for their intended use that all organizations funded by or performing work on behalf of the agency create quality assurance project plans that reflect the output of the systematic planning process.

To remain in compliance with EPA's *Environmental Information Quality Policy*, a quality assurance document that addresses all aspects of *EPA QA/R-5 EPA Requirements for Quality Assurance Project Plans* must be produced and approved by EPA R3 ASQAB. In order to expedite the review and approval process of FSPs, presumption of conformance is extended to FSPs written as supplementary documents to enhanced Quality Assurance Program Plans (QAPrPs) that have been adopted from the state as detailed in the PCP. Should presumption of conformance occur, a comprehensive document review may not be performed immediately upon submission. Following EPA's receipt of the FSP, a memorandum allowing work to begin will be forwarded to the grantee. The EPA reserves the right to audit plans that previously received rescindable presumption of conformance. In the instance that systemic or gross non-compliance with EPA quality policy be discovered via this audit, or by any other means, then the presumption of conformance will be rescinded. Should this occur, it is the responsibility of the grantee and their state to evaluate the usability of the project data and respond accordingly following their internal procedures.

By entering into this agreement, the state attests that they:

- Have entered into an agreement with the 104(k) grantee to oversee the grantee's quality program.
- Will make available any QA resources (e.g. the QAPrP) that are applicable to the grantee's quality system.
- Will review all site-specific FSPs produced by the grantee before work can be performed.
- Will submit all site-specific FSP approval memorandums to the EPA.
- Will keep the grantee apprised of any changes to the state's quality system.

By entering into this agreement, the 104(k) grantee attests that they:

- Will adopt and conform to their state's QAPrP.
- Will prepare and submit to their state a site-specific FSP before any work is performed.
- They will document any deviations from the quality assurance program plan.

By adopting the state VCP's QAPrP, the grantee is attesting that they have read, understood, and intend to comply with the policies and procedures described in the "Presumptive Conformance Program for Section 104(k) Grant-Funded FSPs" with the following exceptions:

By signing this document, the grantee/VCP is attesting that they have read, understood, and intend to comply with conditions set forth in the "Presumptive Conformance Program for Section 104(k) Grant-Funded FSPs."

_____ _____

EPA Region 3 ASQAB Representative/Date

State VCP Quality Assurance Manager/Date

_____ _____

104(k) Grantee Quality Assurance Manager/Date

Appendix E

Presumptive Conformance Program for Section 128(a) Grant-funded FSPs. July 10, 2023.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1600 John F. Kennedy Blvd. Philadelphia, PA 19103-2029			
Subject	Presumptive Conformance Program for Section 128(a) Grant-funded FSPs	**Internal Document Identification Number**	A0001.0
From	EPA Region 3 Quality Assurance Manager, Applied Science & Quality Assurance Branch, Laboratory Services & Applied Science Division (3LS10)		

Presumptive Conformance Program for Section 128(a) Grant-funded FSPs

INTRODUCTION

This Presumptive Conformance Program (PCP) is a voluntary and conditional agreement for an abbreviated Quality Assurance (QA) process that permits delayed verifications of consistency with EPA Region 3's (EPA) Quality System of site-specific Field Sampling Plans (FSPs) prepared for Brownfields site assessments and cleanups conducted by state-led voluntary cleanup programs (VCPs) that utilize EPA's Section 128(a) grant funds. This PCP proposal would allow state VCPs enrolled in the program with revised, enhanced, and EPA-approved Quality Assurance Program Plans (QAPrPs) to begin work upon EPA's receipt of site-specific Field Sampling Plans (FSPs). FSPs under this program are presumed to satisfy EPA's QA requirements without immediate review and verification. Such presumptions of QA conformance, however, can be rescinded any time based on subsequent reviews and verifications by EPA.

SCOPE

The PCP applies to all enrolled state-led VCPs that utilize EPA's Section 128(a) grant funds that remain in active conformance to all stipulations described herein. The PCP is applicable in circumstances where additional grant funding, to include 104(k) grants and CWAGST grants, is being utilized in conjunction with 128(a) funds provided that all work conducted under the supplemental grant agreement is performed by the state-led VCP and remains in conformance with the stipulations described herein.

ENROLLMENT

Enrollment in the PCP is voluntary and conditional. Following the approval of a QAPrP containing the elements described herein, an enrollment letter (Appendix A) attesting that the grantee will uphold the terms of the PCP must be signed by the grantee's Quality Assurance Manager (QAM) and countersigned by the Regional Quality Assurance Manager (RQAM) or a Delegated Approving Official (DAO) from the Region 3 Applied Science & Quality Assurance Branch (ASQAB). Only upon

signature from both parties will FSPs be eligible under this agreement. Documents submitted before the agreement is put in place or following the termination are not eligible for this program.

Grantees may remain enrolled in the PCP so long as conformance with the EPA's quality system is maintained and there is no change in the grantee's quality system that requires EPA review. Upon the end of a five-year QAPrP approval period, the PCP will expire along with the document, and must be renewed along with EPA approval of the resubmitted QAPrP.

PROCEDURE

Grantees are responsible for ensuring work funded by EPA meets EPA's QA requirements. EPA's Quality Policy requires a record of sampling and analysis planned and performed by grantees for funded projects. To qualify for the PCP, QAPrPs must meet all requirements stipulated by EPA information quality procedures, and include the following:

- Data Quality Objectives (DQOs) that cover common activities, data quality goals, and intended use of data for scenarios including but not limited to Phase I and Phase II site assessments, clean-up/removal actions, and information-only sampling; site-specific background and details included in FSPs will supplement the generic DQOs provided in the QAPrP
- Up-to-date SOPs, e.g., field sampling, sample handling and custody, field instrument operation, etc.
- Language attesting that all work must be (or will be) performed in accordance with QAPrP and that any deviations will be documented in site-specific plans and communicated to EPA and programmatic contacts
- Comparison levels for contaminants of concern, which can be included in tables or referenced by hyperlink
- Language detailing the grantee's procedure on the implementation and assessment of corrective actions in the instance that a quality assurance finding calls into question the validity of the environmental information collected during environmental operations covered by this agreement

All FSPs tiered from a QAPrP consistent with the foregoing will be submitted to EPA. The decision review immediately will be made at the discretion of the RQAM and ASQAB of EPA Region 3. FSPs not immediately reviewed by EPA would be presumed to be consistent with EPA's Quality System. EPA would issue a receipt confirmation memo with document title and QA document control number (DCN) by email within two business days. EPA's receipt of an FSP would not equate to EPA

approval, but after receiving EPA's confirmation memo, the grantee could proceed with work covered by the FSP.

At its discretion, EPA will regularly review any or all submitted FSPs under the PCP to monitor conformity with EPA's Quality System. If these assessments reveal systemic or gross nonconformance with EPA's QA requirements, then EPA will require corrective measures and the state VCP in question could be withdrawn from the program.

Findings during the review of a document will be classified as either major or minor. Major findings are defined as any deficiency that could adversely affect data quality. Examples include lack of DQOs, missing or inappropriate quality control, or the selection of an inappropriate analytical method. Minor findings are described as deficiencies that will not reasonably affect data quality. Examples include omissions of R-5 required elements such as a table of contents, distribution list, or policies on secondary data for projects that don't utilize secondary data.

The grantee will be notified of all findings regardless of classification. Upon notification, the grantee will be required to implement a corrective action and preventive action (CAPA). The scale of the CAPA should be proportional to the finding. An open line of communication will be maintained between the EPA and the grantee to facilitate this process and to help ensure nonconformities do not reoccur. The grantee maintains the right to appeal any findings uncovered during an audit. No action towards removal from the program shall occur until the appeal is resolved. Should the appeal demonstrate that the finding was incorrect or otherwise inconducive towards ensuring quality under the PCP, then no further action will be required by the grantee. Should the appeal fail to demonstrate the forementioned, then corrective and preventative actions will need to be implemented. Failure to adequately implement a corrective or preventative action is grounds for removal from the PCP.

Upon the discovery of a finding, a retrospective programmatic investigation, which may include comprehensive review of any or all other documents submitted by the grantee in question, will be initiated to delineate the scale and magnitude of the problem. If a finding is determined to be severe or widespread enough that multiple projects have been affected by it, and the scale of said finding(s) are such that they cannot be addressed through corrective action, then the PCP will be rescinded for the grantee in question. If the finding is isolated to a single project, then response will depend upon the finding's severity. If the finding is minor, the grantee will be notified, but no further action will occur unless the attempted corrective action and preventative actions prove insufficient to address the problem.

Appendix A

Region 3 Quality System

EPA Region 3

Laboratory Service and Applied Science Division
Applied Science and Quality Assurance Branch

Memorandum of Agreement between the U.S EPA and 128(a) Grant Fund Recipients for Enrollment into the Presumptive Conformance Program

This presumptive conformance program (PCP) is an agreement between the U.S. EPA Region 3 Quality Assurance and Applied Sciences Branch (ASQAB) and a state-led voluntary cleanup program (VCP) that conduct operations involving the collection or use of environmental data which are facilitated by funds received under a 128(a) grant agreement. The program allows for the archival of Field Sampling Plans (FSPs) through the rescindable presumption of conformance with EPA's Quality Policy. Only organizations that meet the aforementioned criteria are eligible to enroll in this PCP.

EPA's *Environmental Information Quality Policy* dictates that in order to support EPA's mission to protect human health and the environment and to ensure environmental information operations, products, and services are of known and documented quality for their intended use that all organizations funded by or performing work on behalf of the agency create quality assurance project plans that reflect the output of the systematic planning process.

To remain in compliance with EPA's *Environmental Information Quality Policy*, a quality assurance document that addresses all aspects of *EPA QA/R-5 EPA Requirements for Quality Assurance Project Plans* must be produced and approved by EPA R3 ASQAB. In order to expedite the review and approval process of FSPs, presumption of conformance with the R-5 is extended to FSPs written as supplementary documents to enhanced Quality Assurance Program Plans (QAPrPs) as detailed in the PCP. Should presumption of conformance occur, a comprehensive document review may not be performed immediately upon submission. Following EPA's receipt of the FSP, a memorandum allowing work to begin will be forwarded to the grantee. In the instance that systemic or gross non-compliance with EPA quality policy be discovered by any means, then the presumption of conformance will be rescinded. Should this occur, it is the responsibility of the grantee to evaluate the usability of the project data and respond accordingly following their internal procedures.

By signing this document, the grantee is attesting that they have read, understood, and intend to comply with conditions set forth in the "Presumptive Conformance Program for Section 128(a) Grant-funded FSPs."

_____ _____

EPA Region 3 ASQAB Representative/Date 128(a) Grantee Quality Assurance Manager/Date

Appendix F

ACM, LBP, Mold, Radon Guidance and Quality Assurance Requirements for Asbestos Surveys, Lead-based Paint Inspections, Mold Surveys, and Radon Testing in Building Structures. January 20, 2023.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

DATE: January 20, 2022

SUBJECT: Guidance and Quality Assurance Requirements for Asbestos Surveys, Lead-based Paint Inspections, Mold Surveys, and Radon Testing in Building Structures

FROM: Brownfields & Revitalization Branch (3LD50)

THRU: Kia Long, EPA Region 3 Quality Assurance Manager
Laboratory Services & Applied Science Division (3LS10)

TO: EPA Region 3 Brownfields Cooperative Agreement Recipients and
EPA Region 3 Land, Chemicals, and Redevelopment Division

The purpose of this memo is to clarify quality assurance requirements and provide guidance to EPA Region 3 Brownfields Cooperative Agreement Recipients (CAR a.k.a. "grantees") regarding Asbestos Surveys, Lead-based Paint Inspections, Mold Surveys, and Radon Testing for building structures at sites that are being evaluated for possible brownfield redevelopment. The purpose of these surveys and inspections is to identify hazardous materials such as asbestos containing materials (ACM), lead based paint (LBP), mold contaminated materials, and radon located in and on buildings. These surveys and inspections support future redevelopment plans to renovate or demolish the structure and provide the necessary cost estimates to address these issues.

A formal EPA approved Field Sampling Plan (FSP) is not required for these types of assessments. However, all quality assurance and quality control procedures and requirements in any applicable federal, state, or local regulation, policy and guidance must be followed. If any of these initial surveys and inspections reveal contamination that requires subsequent remediation and removal, or if other contaminants of concern are present at the site, then an EPA approved Quality Assurance Project Plan (QAPP) is required before the start of any activity. This memo does not apply to soil related activities.

Cooperative Agreement Recipients (CARs) are requirement to submit a "Property Approval Questionnaire for Hazardous Substances" for approval from the EPA Project Officer (PO) prior to initiating any site-specific assessment work. The CAR should note in the form that these surveys or inspections will be conducted in addition to other environmental site assessment or planning efforts at the site. However, due to the nature of the location and varying site conditions regarding the subject contaminants, the generation of a formal Field Sampling Plan prior to initiating the surveys and/or inspections of the subject contaminants will not be required provided that all work is performed in accordance with federal, state, and local requirements and

that all activities performed with federal funds are properly documented in a final report submitted to EPA Region 3 at the conclusion of assessment.

A site-specific Health and Safety Plan (H&S) Plan must be completed prior to implementation of field work. Site-specific project personnel must be added or modified as needed, and the plan must provide a location for emergency services closest to the site. All on-site personnel shall have completed 40-hour health and safety training, with annual refresher, in accordance with 29 CFR 1910.120 and/or equivalent training to facilitate the type of inspections covered in this guidance. OSHA requires the use of personal protective equipment (PPE) to reduce employee exposure to hazards when engineering and administrative controls are not feasible or effective in reducing these exposures to acceptable levels. Employers are required to determine if PPE should be used to protect their workers, and the cost of PPE must be included in the Vendor's cost for any line item that may expose the worker to any such hazards. **(**https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765**).** A copy of the site-specific health and safety plan must be included in the appendix of the final report.

1. ASBESTOS-CONTAINING MATERIALS SURVEY

a. Asbestos Surveys must conform to all applicable regulations pertaining to asbestos demolition surveys, including 40 CFR Part 61 (https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr61_main_02.tpl), 29 CFR 1926.1101 (https://www.govinfo.gov/app/details/CFR-2011-title29-vol8/CFR-2011-title29-vol8-sec1926-1101), and applicable state and local regulations.
b. A state-licensed asbestos inspector must conduct the survey in accordance with EPA methods and Occupational Safety and Health Administration (OSHA) regulations as well as any additional state requirements.
c. Additional information about asbestos, training, and finding certified labs can be found at https://www.epa.gov/asbestos.

2. LEAD-BASED PAINT SURVEY

a. Lead-Based Paint Inspections must conform to the Work Practice Standards for Conducting Lead-Based Paint Activities (https://www.govinfo.gov/app/details/CFR-1999-title40-vol23/CFR-1999-title40-vol23-sec745-227).
b. A state-licensed lead inspector must conduct the survey in accordance with EPA methods and state regulations.
c. Additional information regarding lead hazards can be found at https://www.epa.gov/lead.

3. MOLD INVESTIGATION

a. Buildings are typically surveyed by experienced environmental field sampling technicians/personnel for visible mold growth. A CAR should consult with state and local authorities regarding requirements regarding training and certification of mold investigators.

b. Mold investigations are an eligible EPA Brownfield activity for sampling and remediation, and a grantee can consult EPA's website for https://www.epa.gov/mold/mold-testing-or-sampling for additional information. The OSHA guidance document, "A Brief Guide to Mold in the Workplace" provides recommended guidelines when impacting mold contaminated materials. The full document can be found at https://www.osha.gov/publications/shib101003.

4. RADON TESTING

a. Testing follows the protocols set by the American Association of Radon Scientists and Technologists, Protocol for Conducting Radon and Radon Decay Product Measurements in Multifamily Buildings (ANSI-AARST MAMF-2012, Section III, or similar section in the most recent addition). Radon Testing must be performed under the direct supervision of a Radon Professional, certified by the American Association of Radon Scientists and Technologists (http://aarst-nrpp.com/wp/) National Radon Proficiency Program or the National Radon Safety Board (http://www.nrsb.org/).
b. A state-licensed radon tester must conduct the survey in accordance with any EPA methods and state regulations.
c. Additional information regarding radon can be found at https://www.epa.gov/radon.

At a minimum, field procedures for survey/sampling should include:

- Review any existing information about the structure including design drawings, as-built drawing, project specifications, and any existing survey and/or laboratory information.
- Utilize the proper equipment to examine all accessible spaces (i.e., ladders, flashlights, etc.).
- Confirm with the Owner or Owner's Representative the exact nature of the investigation, demolition/renovation and identify all materials that will be disturbed or accessed.
- Determine the extent to which the building will be renovated and/or demolished.
- Determine and investigate each building's structural, mechanical, electrical, and roofing systems.
- Perform a comprehensive investigation of areas to identify materials to be sampled and/or assumed to contain asbestos, lead based paint, mold, or radon.
- Clearly note uninspected areas and explain why they were not surveyed (i.e., "confined space," buried material, restrictions generated by the property owner, etc.).
- Create sampling plan based on suspect materials present and requirements of 40 CFR 763-85 & 763.86.
- If permitted, destructive sampling/investigation will be performed to look for hidden materials.

- Collect bulk samples of all suspect materials that will be disturbed and submit to a certified laboratory for analysis. Ensure that each individual sample is allotted a specific identification number which shall be transcribed onto a chain of custody form for submittal to the analytical laboratory.
- Document where asbestos material exists and record their approximate location, condition, and approximate quantity. This information should be presented in a format allowing for cost estimates to be generated for remediation purposes.

At a minimum, survey/sampling reports should include:

1. Scope of Work:
    - Date(s) of field inspection
    - Date of report submittal
    - Building address
    - Building Owner including address and contact person
    - Description of area surveyed including any exclusions or limitations
    - Name or report writer(s) and reviewer(s) including all applicable accreditation, certification, and licensing information
2. Building Description:
    - Building name, if applicable
    - Type of building (e.g., commercial, warehouse, retail, residential, etc.)
    - Specific features of building
    - Type of business
    - Approximate age of structures and dates of past renovations
    - Building Systems such as structural system, mechanical system, roofing system, non- structural systems, miscellaneous information, etc...
3. Building Inspector / Firm Affiliation / Laboratory Information:
    - Names(s) of Building Inspector(s) including certification/licensing number and expiration date
    - Inspector firm information including name, address, and phone number
    - Laboratory name and certification
    - Special instructions regarding type of analysis requested
4. Survey Methodology:
    - Description of inspection procedure, including scope of survey. Inspection must be in accordance with the sampling protocol required by federal, state, and local regulations.
    - If hidden or inaccessible areas are to be disturbed or are likely to be disturbed, a destructive investigation must be performed. Provide a detailed description of the procedure used to find hidden suspect materials. For example, if asbestos pipe insulation is suspected in a wall cavity, describe by location where the wall was opened for examination. It is recommended that each building and non-structural system suspected of having asbestos materials be sampled at minimum of three locations.

- Description of sampling methods

5. Asbestos Identification Process:
    - Prepare sample and suspect asbestos material location plan.
    - List all material sampled and tested.
    - List all material assumed to contained asbestos.
    - Indicate type and amount of material sampled, be specific.
    - Describe suspect material location, friability, and approximate location.
    - List all materials not sampled and state why they were not sampled.

A copy of the H&S Plan shall be submitted in the appendix of report submission and shall be completed in conformance of federal, state, and local regulations and practices. Safety is the primary responsibility of the CAR and their consultant. Typical information contained in a H&S Plan include:

1. Organizational Structure
    - Roles and responsibilities
    - Identification of other site contractors
    - Other local/state/federal agency representatives and their roles responsibilities
2. Job Hazard Analysis
    - Site history
    - Job hazard analysis
    - Employee notification of hazards and overall site information program
3. Site Control
    - Site map
    - Site access
    - Site security
    - Buddy system
    - Site communications
    - Emergency medical assistance
4. Training Program
    - Training elements to be covered for site workers
    - Site-specific briefings for visitors
    - H&S Plan information and site-specific briefings for workers
    - Initial training
    - Management and supervisor training
    - Qualification of trainers
    - Training certification
    - Refresher training
5. Medical surveillance

- Site medical surveillance program
- Communication between the site, physicians, and workers
- Medical recordkeeping procedures
- Program review

6. Personal Protective Equipment
- PPE selection criteria
- Use of PPE
- Training
- Respiratory protection
- Hearing conservation
- PPE maintenance & storage
- Evaluation of PPE program

7. Exposure Monitoring
- Air monitoring
- Surface sampling
- Equipment calibration and maintenance
- Handling and maintenance of monitoring data

8. Emergency Procedures
- Local emergency phone numbers
- Emergency contacts
- Medical facility w/map/directions

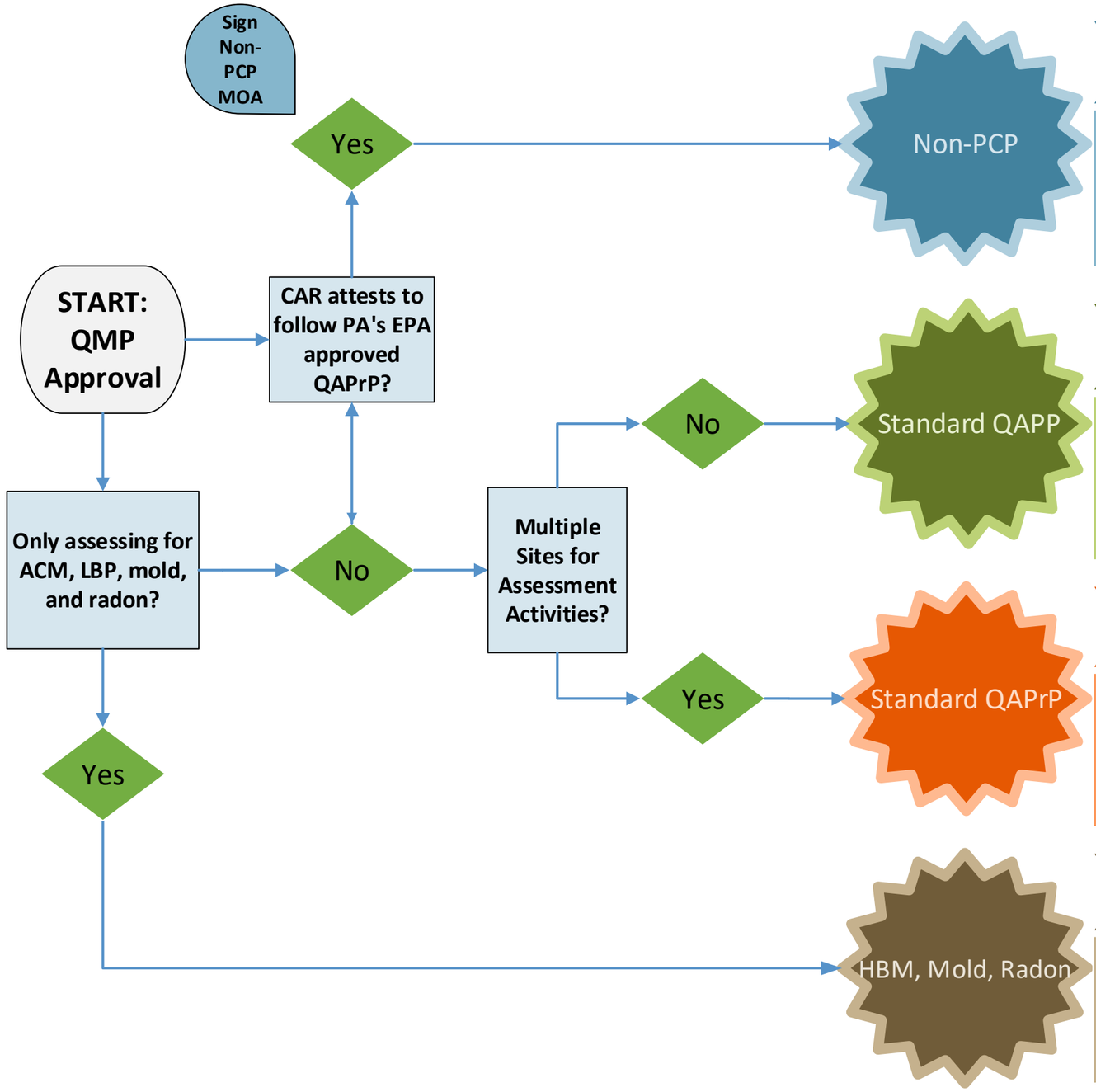
Appendix G1

Delaware, Marland, Pennsylvania, Virginia Process Charts

Region 3 - Brownfields & Redevelopment Section

Quality Assurance Guidance Manual

G1 - Delaware, Maryland, Pennsylvania, and Virginia QA Process Overview Flow Chart



Non-PCP	Need a QAPP/ QAPrP?	Approving agency?	Timing	No VRP Required	Costs
	No, follow your state's QAPrP.	EPA approves the FSP.	Approx. 10 days.	Will **NOT** receive relief of liability unless the site enters the state's VRP/VCP.	No QAPrP writing costs. Only FSP generation costs.

Standard QAPP	Need a QAPP/ QAPrP?	Approving agency?	Timing	No VRP Required	Costs
	Yes. A QAPP will be required for each site.	EPA approves the QAPP.	Standard QA Review time. Approx. 45 Days.	Will **NOT** receive relief of liability unless the site enters the state's VRP/VCP.	CAR incurs QAPP generation costs for every site.

Standard QAPrP	Need a QAPP/ QAPrP?	Approving agency?	Timing	No VRP Required	Costs
	Yes, a QAPrP will be supported by individual FSPs per site.	EPA approves the QAPrP and FSP.	Approx. 45 days for QAPrP review and 45 days for FSP review.	Will **NOT** receive relief of liability unless the site enters the state's VRP/VCP.	CAR incurs QAPrP once and FSP costs per site.

HBM, Mold, Radon	Need QAPP/QAPrP?	Approving agency?
	No. Follow the ACM, LBP, Mold, Radon Memo.	EPA does not require a FSP approval.

Revised: April 3, 2025

Region 3 - Brownfields & Redevelopment Section

Quality Assurance Guidance Manual

G1 - Delaware, Maryland, Pennsylvania, and Virginia Standard QAPP Process Flow Chart

Standard QAPP

Route Considerations

Need a QAPP/ QAPrP?	Approving agency?	Timing	No VRP Required	Costs
Yes, one QAPP per site.	EPA approves the QAPP.	Standard QA Review time is approximately 45 days for each QAPP.	Will **NOT** receive relief of liability unless the site enters the state's VRP/VCP.	CAR incurrs QAPP development costs for every site.

Start

1	QMP is approved by EPA.

45 Days

QAPP Submitted

1	Includes site-specific elements.
2	PO sends QAPP to ASQAB.
3	PO sends QAPP to ASQAB.

QAPP Reviewed

1	45 day initial review period.
2	Revision period is 15 days.

QAPP Decision

- **No** — EPA does not approve QAPP. CAR cannot begin field work.
- **Cond** — CAR may start field work with conditional approval. Resubmission due within 30 days.
- **Yes** — EPA approves QAPP.

45 Days

QAPP Revision

QAPP Approval

1	ASQAB sends approval memorandum to PO.
2	PO sends approval memorandum to CAR.
3	Cond. approval revisions signed in 2 days.

QAPP Approved

Region 3 - Brownfields & Redevelopment Section

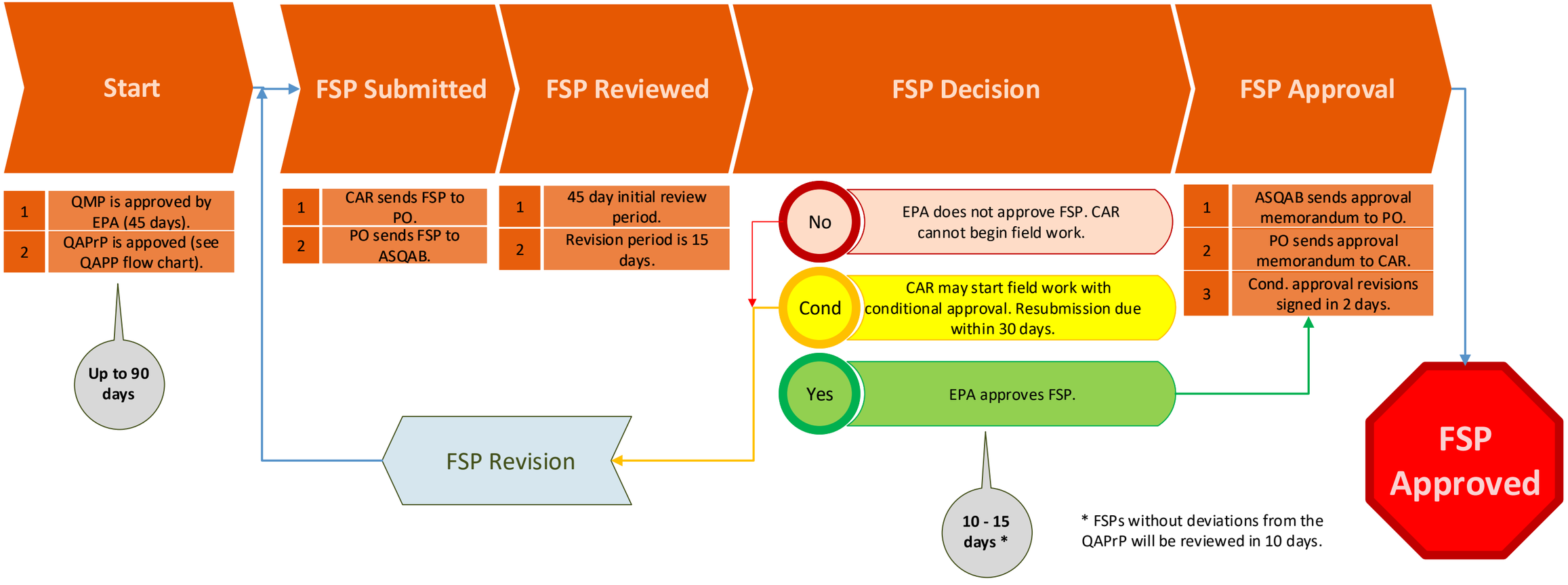
Quality Assurance Guidance Manual

G1 - Delaware, Maryland, Pennsylvania, and Virginia Standard QAPrP Process Flow Chart

Standard QAPrP

Route Considerations

Need a QAPP/ QAPrP?	Approving agency?	Timing	No VRP Required	Costs
Yes, a QAPrP is written to support the program. Subsequently, FSPs are developed for each site that is assessed.	EPA ASQAB approves the QAPrP and subsequent FSP(s).	Standard QA Review time. QAPrP review is approximately 45 days. FSP review is an additional 45 days for every document.	Will **NOT** receive relief of liability unless the site enters the state's VRP/VCP.	CAR will incur QAPrP and FSP generation costs.



Region 3 - Brownfields & Redevelopment Section

Quality Assurance Guidance Manual

G1 - Delaware, Maryland, Pennsylvania, and Virginia Non-PCP Process Flow Chart

Non-PCP

Route Considerations

Need a QAPrP/ QAPP?	Who Approves the FSP?	Timing	No VRP Required	Costs
No, by signing the non-PCP MOA the CAR will follow the EPA approved state QAPrP.	EPA approves the FSP.	Shortened QA Review time by removing the standard EPA QA Review.	Will **NOT** receive relief of liability unless the site enters the state's VRP/VCP.	It is faster and less costly to adopt the state's QAPrP. CAR uses grant funds to pay for FSP development.

Start

1	QMP is approved by EPA.
2	Sign PCP MOA.
3	Follow PA's EPA approved QAPrP.

45 Days

FSP Submitted to EPA

1	CAR sends SAWP to PO.
2	PO posts FSP to SharePoint.

FSP Revision

FSP Reviewed by EPA

1	BF reviews within 7 days.
2	ASQAB decision within 3 days.

FSP Decision

- **No** — EPA does not approve FSP. CAR cannot begin field work.
- **Cond** — CAR may start assessment work with conditional approval. Resubmission due within 30 days.
- **Yes** — EPA approves FSP.

Up to 7 Days

FSP Approval

1	ASQAB approves FSP within 3 days.
2	PO sends approval memo to CAR.
3	CAR may begin field work.

3 Days

FSP Approved

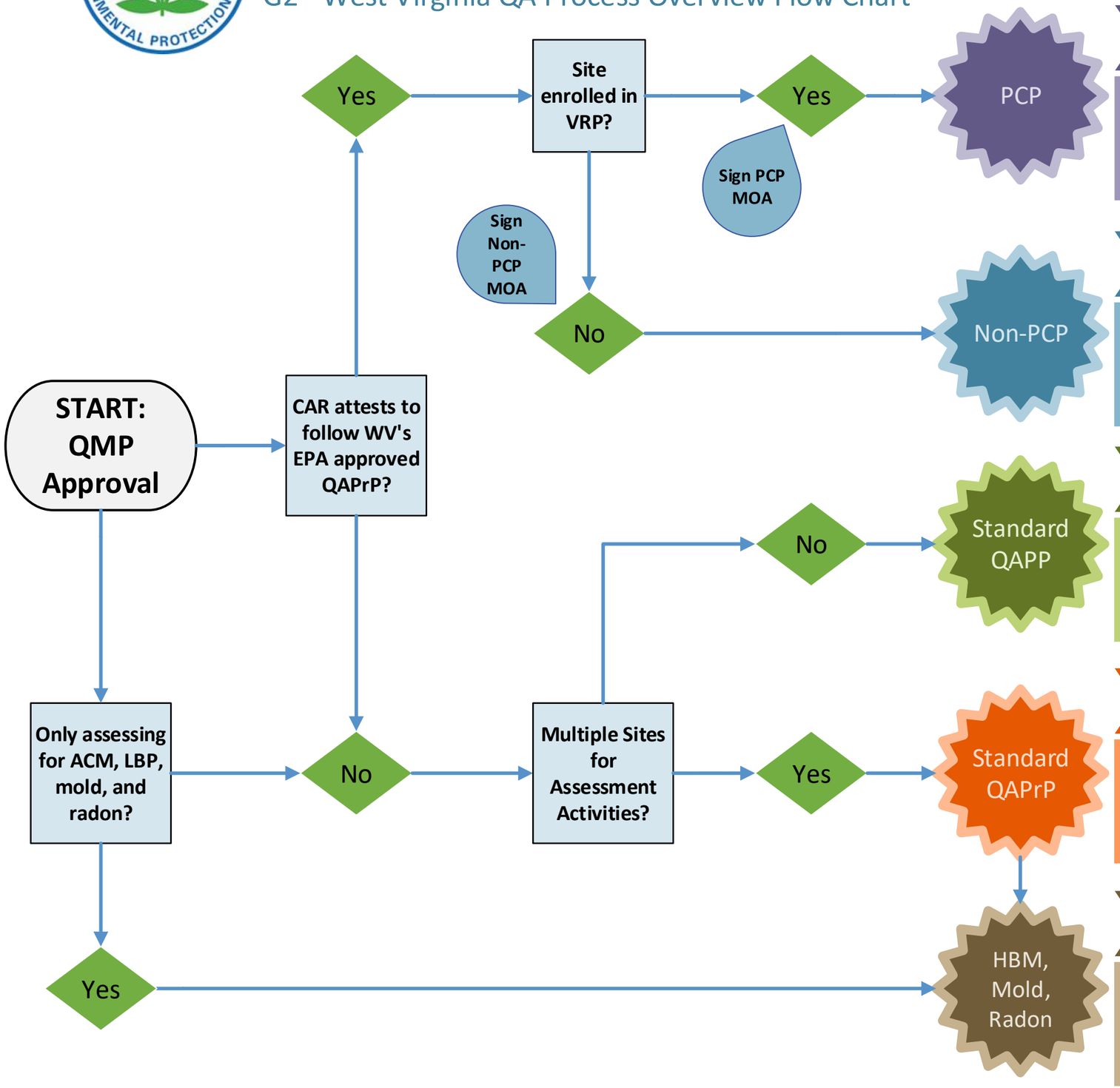
Appendix G2

West Virginia Process Flow Charts

Region 3 - Brownfields & Redevelopment Section

Quality Assurance Guidance Manual

G2 - West Virginia QA Process Overview Flow Chart



Need a QAPP/ QAPrP?	Approving Agency?	Timing	VRP Required	Costs
No, follow the state's QAPrP.	WVDEP reviews and approves the FSP.	Approx. 30 Days.	Must enter and follow requirements of WVDEP's VRP.	VRP costs are reimbursable by the EPA CA. No costs for a QAPrP. FSP generation costs.

Need a QAPP/ QAPrP?	Approving Agency?	Timing	No VRP Required	Costs
No, follow state's QAPrP.	EPA approves the FSP.	Approx. 10 Days.	Will NOT receive a Certificate of Completion from WVDEP.	No QAPrP generation costs. FSP generation costs.

Need a QAPP/ QAPrP?	Approving Agency?	Timing	No VRP Required	Costs
Yes. A QAPP will be required for each site.	EPA approves the QAPP.	Standard QA Review time. Approx. 45 days.	Will **NOT** receive a Certificate of Completion from WVDEP.	QAPP generation costs per site.

Need a QAPP/ QAPrP?	Approving Agency?	Timing	No VRP Required	Costs
Yes, a QAPrP will be supported by SAWPs for each site.	EPA approves the SAWP.	Approx. 45 days for QAPrP review + 45 days for SAWP review.	Will NOT receive a Certificate of Completion from WVDEP.	QAPrP and SAWP costs.

Need QAPP/ QAPrP?	Approving agency?
No. Follow the ACM, LBP, Mold, Radon Memo.	EPA does not require a FSP approval.

Revised: April 3, 2025

Region 3 - Brownfields & Redevelopment Section
Quality Assurance Guidance Manual
G2 - West Virginia PCP Process Flow Chart

PCP

Route Considerations

Need a QAPrP/ QAPP?	Approving agency?	Timing	VRP Requirement	Costs
No, by signing the PCP MOA the 104(k) CAR will follow the EPA approved WVDEP QAPrP.	WVDEP will review & approve the FSP. EPA will archive the FSP when received or perform an audit review.	WVDEP review period is approximately 30 days.	Must enter the State VRP. Recieve a WVDEP Certificate of Completion by following the VRP for cleanup activities.	VRP and FSP development costs are reimbursable expenses. QAPrP costs are significantly reduced by adopting the WVDEP QAPrP.

Start

1	QMP is approved by EPA.
2	Enroll site into VRP.
3	Sign PCP MAO.
4	Follow WVDEP QAPrP.

45 Days

Submit SAWP to WVDEP

1	SAWP is equivalent to a FSP with a HASP.
2	FSP aligns with WVDEP QAPrP.
3	WVDEP approves the SAWP.

30 Days

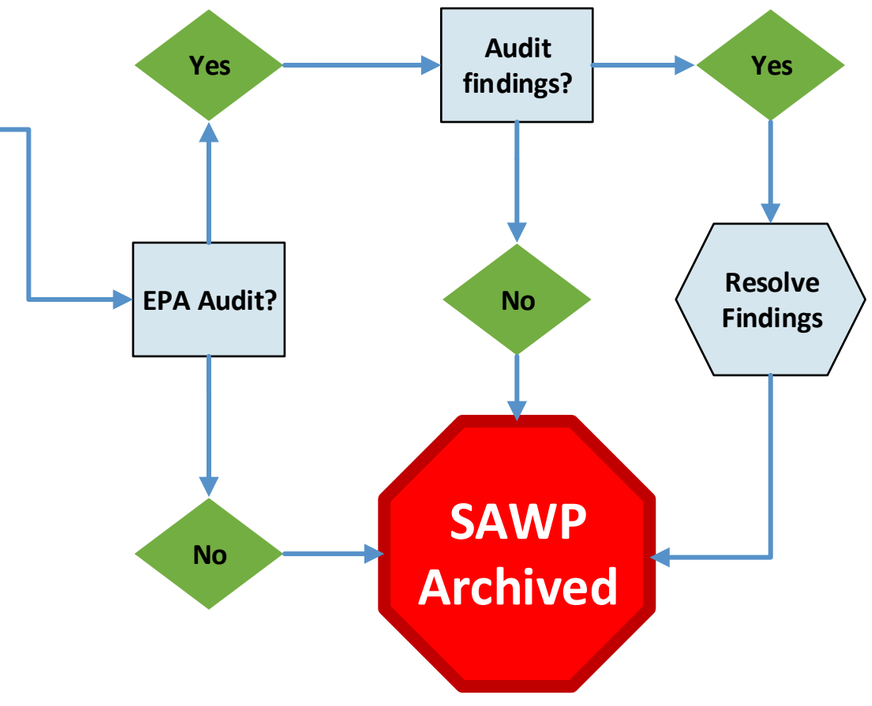
SAWP Submitted to EPA

1	Submit approved SAWP to EPA PO.

SAWP Confirmation by ASQAB

1	PO submits FSP to ASQAB.
2	ASQAB sends DCN within 2 days.
3	Assessments activities may start immediatley.
4	ASQAB will audit for review or archive.

2 Days



Region 3 - Brownfields & Redevelopment Section
Quality Assurance Guidance Manual
G2 - West Virginia Non-PCP Process Flow Chart

Non-PCP

Route Considerations

Need a QAPrP/ QAPP?	Approving agency?	Timing	VRP Requirement	Costs
No, by signing the non-PCP MOA the CAR will follow the EPA approved WVDEP QAPrP.	EPA approves the FSP.	Shortened QA Review time by removing the standard EPA QA Review.	Will **NOT receive** a WVDEP Certificate of Completion from WVDEP VRP unless site is enrolled.	It is faster and less costly to adopt WVDEP's QAPrP. CAR uses grant funds to pay for FSP development.

Start

1. QMP is approved by EPA.
2. Sign PCP MOA.
3. Follow WVDEP QAPrP.

45 Days

FSP Submitted to EPA

1. CAR sends FSP to PO.
2. PO posts FSP to SharePoint.

FSP Reviewed by EPA

1. BF reviews within 7 days.
2. ASQAB decision within 3 days.

FSP Decision

- **No** — EPA does not approve SAWP. CAR cannot begin field work.
- **Cond** — CAR may start assessment work with conditional approval. **Resubmission due within 30 days.**
- **Yes** — EPA approves FSP.

7 Days

FSP Revision

FSP Approval

1. ASQAB approves SAWP within 3 days.
2. PO sends approval memo to CAR.
3. CAR may begin field work.

3 Days

SAWP Approved

Region 3 - Brownfields & Redevelopment Section
Quality Assurance Guidance Manual
G2 - West Virginia Standard QAPP Process Flow Chart

Standard QAPP

Route Considerations

Need a QAPrP/ QAPP?	Approving agency?	Timing	VRP Requirement	Costs
Yes, one QAPP per site.	EPA approves the QAPP.	Standard QA Review time is approximately 45 days.	Will **NOT** receive a WVDEP Certificate of Completion from WVDEP VRP unless site is enrolled.	CAR incurrs QAPP development costs for every site.

Start

1. QMP is approved by EPA.

45 Days

QAPP Submitted

1. CAR sends QAPP to PO.
2. PO sends QAPP to ASQAB.

QAPP Reviewed

1. 45 day initial review period.
2. Revision period is 15 days.

QAPP Decision

- **No** — EPA does not approve SAWP. CAR cannot begin field work.
- **Cond** — CAR may start field work with conditional approval. **Resubmission due within 30 days.**
- **Yes** — EPA approves SAWP.

45 Days

QAPP Revision

QAPP Approval

1. ASQAB sends approval memorandum to PO.
2. PO sends approval memorandum to CAR.
3. Cond. Approval revisions signed in 2 days.

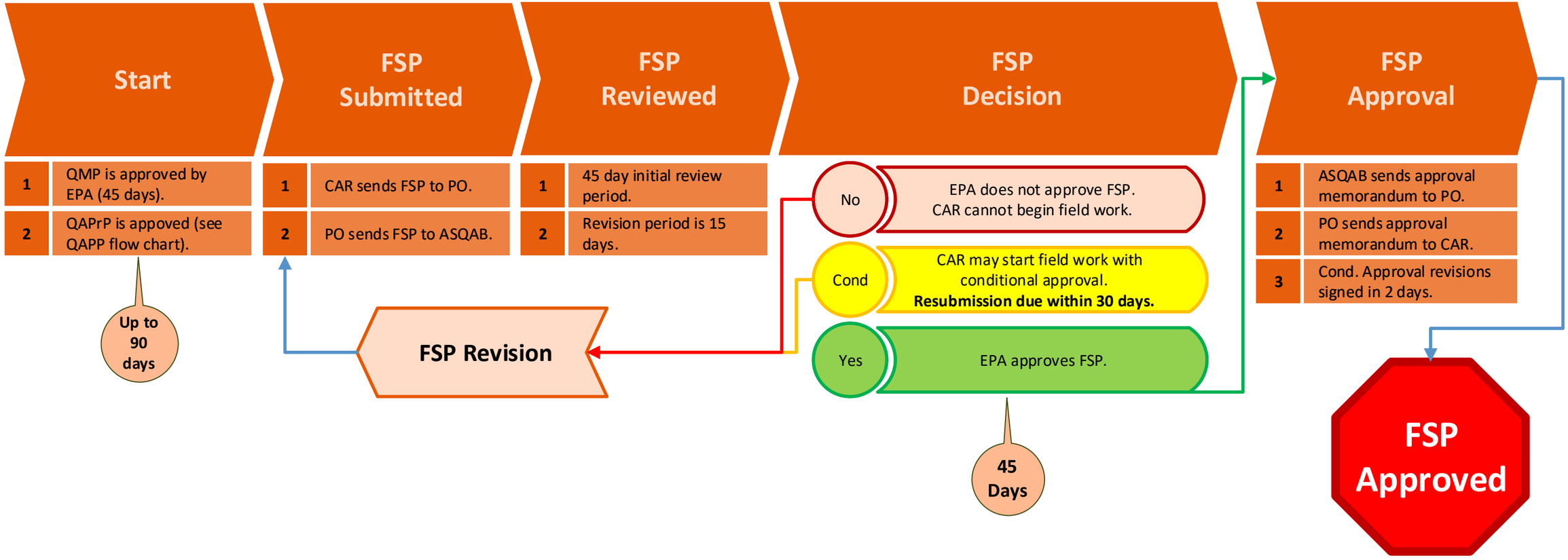
QAPP Approved

Region 3 - Brownfields & Redevelopment Section
Quality Assurance Guidance Manual
G2 - West Virginia Standard QAPrP Process Flow Chart

Standard QAPrP

Route Considerations

Need a QAPrP/ QAPP?	Approving agency?	Timing	VRP Requirement	Costs
Yes, a QAPrP is written to support the program. Subsequently, FSPs are developed for each site that is assessed.	EPA ASQAB approves the QAPrP and subsequent FSP(s).	Standard QA Review time. QAPrP review is approximately 45 days. FSP review is an additional 45 days for every document.	Will **NOT** receive a WVDEP Certificate of Completion from WVDEP VRP unless site is enrolled.	CAR will incur QAPrP once and FSP generation costs for each site.



Appendix H

Pre-Submittal Quality Assurance Document Review Checklist

EPA Region 3 Quality System

PRE-SUBMITTAL QUALITY ASSURANCE DOCUMENT REVIEW CHECKLIST

Document Title:

QA Document Type: Select type... **Completed by:** **Date:**

Preparer's Signature:

The purpose of this checklist is to ensure document completeness (not adequacy) prior to submittal to R3 for quality review and approval. These questions represent common omissions which render a document incomplete in meeting EPA QA requirements. Once all questions are checked, (if N/A, please explain in comments).

Project Management	Yes	N/A	Comments (incl. page # or section)
1) Is there a title, organization name, date, revision number and page numbers?	☐	☐	
2) Are appropriate approval lines and signatures present? Minimum requirements include: *a*, Outside Organization Project Manager *b*. Outside Organization QA Officer *c*. EPA DPM (Designated Project Manager) d. EPA Delegated Approving Official (DAO)	☐	☐	
3) Is there a list of individuals who are to receive a copy of the QA document?	☐	☐	
4) Are roles/responsibilities of staff defined, incl. maintaining the QA document?	☐	☐	
5) Is an organizational chart present with all program/project individuals identified?	☐	☐	
6) Does the description state task(s), purpose(s), work schedule(s), and location?	☐	☐	
7) Does it discuss Data Quality Objectives- performance/measurement criteria (action levels) for information to be collected, including precision, accuracy/bias, representativeness, completeness, comparability, and sensitivity?	☐	☐	
8) Do quantitation limits meet standards (e.g., cleanup goals, permit limits)?	☐	☐	
9) Are training requirements, delivery method, & personnel responsible identified?	☐	☐	
10) Does the documentation & records section accurately represent the program/project needs?	☐	☐	
Data Generation/Acquisition	**Yes**	**N/A**	**Comments**
11) Are sampling design components, including the number of samples collected, locations (e.g., maps), and methods, described?	☐	☐	
12) Are valid hyperlinks or attachments present for referenced methods and SOPs?	☐	☐	
13) For laboratory samples, are sample methods, containers, volumes, collection type (e.g., composited, split), and preservatives listed?	☐	☐	
14) For laboratory samples, is language included regarding lab accreditation?	☐	☐	
15) Is chain of custody included or referenced and does it describe sample handling?	☐	☐	
16) Are procedures identified to follow when failures occur, identifying individual responsible for corrective action and documentation?	☐	☐	
17) Are the laboratory and field quality control activities clearly identified?	☐	☐	
18) Is equipment cleaning, calibration, testing, inspection & maintenance included?	☐	☐	
19) Are critical supplies and consumables identified?	☐	☐	
20) If using existing data (i.e., secondary data, non-direct measurements), does it include data sources and acceptance criteria?	☐	☐	
21) Is the data management scheme described from field to final use?	☐	☐	
Assessment & Oversight	**Yes**	**N/A**	**Comments**
22) Does it describe assessment activities and response action procedures (to include audits, corrective actions, reporting to management)?	☐	☐	
Data Validation and Usability	**Yes**	**N/A**	**Comments**
23) Does it describe criteria for accepting, rejecting, or qualifying data?	☐	☐	
24) Does it describe data verification [verifying performance of field or laboratory operations (e.g., blanks, duplicates, preservation times, chain of custody)], responsible parties for verification, issue resolution process (e.g., limitations on data), and data validation (if necessary, e.g. independent third party)?	☐	☐	

Please submit completed checklist with QA document to EPA DPM (e.g. RPM, OSC, SAM, PO). EPA DPM will then submit QA document package for review to R3 ASQAB Quality staff at R3_QA@epa.gov. QA document package should include:

1. QA document (and if applicable, other supporting documentation)
2. QA Document Review Request Form
3. This pre-submittal Quality Assurance Document Review Checklist

QA Documents must be approved prior to any data collection work or use, except under circumstances requiring immediate action to protect human health and the environment or operations conducted under police powers.

Quality Assurance Programmatic Plan (QAPrPs) - QAPrPs define and document type and quality of data and methods required for collecting, analyzing, and assessing data to support decisions across recurring or like activities within a single program. QAPrPs shall describe the QA elements that remain constant among the different projects, activities, or sites. Most QAPrPs shall be supported by project-specific, activity-specific, or site-specific documentation (e.g., FSPs, Work Plans, inspection checklists, or equivalent). These documents shall address specific QA elements articulated in EPA's QA/R-5 (QAPP requirements) and QA/G-5 (QAPP guidance) documents and are unique to each project, activity, or site. QAPrPs and supporting documents undergo technical reviews for accuracy, completeness, and compliance with programmatic guidance.

Quality Assurance Project Plan (QAPP) - describe in detail the necessary QA, QC, & other technical activities for projects. R3 policy requires results of the systematic planning process be documented in a QAPP or equivalent QA document approved by authorized personnel (e.g. DAO) prior to implementation. The level of detail found in the QAPP shall be commensurate with the nature of the work being performed and intended use of the data (i.e., graded approach). If a particular QAPP element does not apply to the project, the element must be included and an explanation describing why it does not apply. QAPP requirements apply to all environmental data operations, including existing data, conducted by Regional staff or through grants, cooperative agreements, contracts, IAs, and compliance orders.

Field sampling plan (FSP) – project, site or activity specific companion quality document, supported by a quality assurance project plan which describes project objectives, sampling locations and rationales for their selection, sampling methods, analytical methods, preservation, chain-of-custody and shipping requirements. A FSP will contain quality control acceptance criteria for field samples but may or may not contain this information for laboratory analyses. (Note: for FSPs, some items will be missing from this checklist since should be detailed in the programmatic QAPP (i.e., QAPrP, generic QAPP).

Sampling and analysis plan (SAP)* - as outlined in the National Contingency Plan, detail procedures for conducting field activities and have two components, 1. a QAPP or QAPrP and 2. a FSP. *Applicable to CERCLA only

R3 Quality Resources
Internal: https://intranet.epa.gov/r3intran/qa/
External: https://www.epa.gov/quality/managing-quality-environmental-data-epa-region-3