

Region 4
U.S. Environmental Protection Agency
Science and Ecosystem Support Division
Athens, Georgia

OPERATING PROCEDURE

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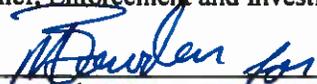
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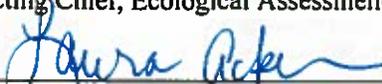
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Revision History

The top row of this table shows the most recent changes to this controlled document. For previous revision history information, archived versions of this document are maintained by the SESD Document Control Coordinator on the SESD local area network (LAN).

History	Effective Date
<p>SESDPROC-003-R5, <i>Report Preparation and Distribution</i>, replaces SESDPROC-003-R4</p> <p>General: Corrected any typographical, grammatical, and/or editorial errors. Throughout the document mention of quality system or SESD quality system was replaced with Field Branches Quality System or FBQS.</p> <p>Cover Page: Changed the Author from Liza Montalvo to Bobby Lewis. Changed the Enforcement and Investigations Branch Chief from Danny France to John Deatrck. Changed the Ecological Assessment Branch Chief from John Deatrck to Acting Chief, Laura Ackerman. Changed the FQM from Bobby Lewis to Hunter Johnson.</p> <p>Revision History: Changes were made to reflect the current practice of only including the most recent changes in the revision history.</p> <p>Section 2.2: Omitted requirement for Field Branches technical reviews of provisional data reports. Added language that allows for electronic transfer of a provisional data report to a customer while still providing a mechanism for documentation in the project file. Included language reiterating “End of Report” requirement</p>	October 23, 2014
SESDPROC-003-R4, <i>Report Preparation and Distribution</i> , replaces SESDPROC-003-R3	January 29, 2013
SESDPROC-003-R3, <i>Report Preparation and Distribution</i> , replaces SESDPROC-003-R2	May 22, 2009
SESDPROC-003-R2, <i>Report Preparation and Distribution</i> , replaces SESDPROC-003-R1	November 1, 2007
SESDPROC-003-R1, <i>Report Preparation and Distribution</i> , Replaces SESDPROC-003-R0	September 24, 2007
SESDPROC-003-R0, <i>Report Preparation and Distribution</i> , Original Issue	February 5, 2007

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1 General

1.1 Purpose

The purpose of this procedure is to describe the approach used by SESD to develop reports for a project, to verify the accuracy of information reported and to determine that the completed work meets the objective(s) agreed upon with the requestor/customer as identified in the project plan or associated records. Employees subject to these requirements may have additional responsibilities outlined in the SESD Operating Procedure for Control of Records (SESDPROC-002).

1.2 Scope/Application

SESD field investigation reports must be developed and reviewed as described in this document. For the purposes of this procedure, a report is defined as a written account prepared to provide specific findings of SESD work. For environmental data collection, a report will describe the results of associated observations, sampling results, measurement results and/or scientific interpretation. In addition, a report will provide specific findings of SESD investigations whether or not environmental data collection is involved (e.g., process descriptions, expert opinions or other work efforts). All findings and results will be reported accurately, clearly and objectively. Mention of trade names or commercial products in this operating procedure does not constitute endorsement or recommendation for use.

1.3 Documentation/Verification

This procedure was prepared by persons deemed technically competent by SESD management, based on their knowledge, skills and abilities and has been tested in practice and reviewed in print by a subject matter expert. The official copy of this procedure resides on the SESD local area network (LAN). The Document Control Coordinator is responsible for ensuring the most recent version of the procedure is placed on the SESD LAN and for maintaining records of review conducted prior to its issuance.

1.4 References

SESD Operating Procedure for Control of Records, SESDPROC-002, Most Recent Version

SESD Operating Procedure for Sample and Evidence Management, SESDPROC-005, Most Recent Version

SESD Review of Field Investigation Reports Form, SESDFORM-018, Most Recent Version

SESD Technical Review of Provisional Data Form, SESDFORM-029, Most Recent Version

USEPA Region 4 Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (EISOPQAM), November 2001

U.S. EPA Science Policy Council Peer Review Handbook, Most Recent Version

2 Field Investigation Report Preparation

2.1 Report Content

At a minimum, the following information will be included in all SESD field investigation reports:

1. a title;
2. name and address of SESD and of the location where the field investigation was conducted;
3. the name and address of the requestor;
4. the date and name, position, and signature or equivalent identification of the person(s) that prepared the report and of the Section Chief or designee authorized to approve and release the report;
5. unique identification of the report on each page; (i.e., project identification number [Project ID]).
6. the page number and the total number of pages (i.e., page x of y) on each page; (If appendices and/or attachments are included in the field investigation report, the total number of pages in each appendix and/or attachment will be accounted for by either following the sequential numbering system of the field investigation report or by numbering each appendix and/or attachment separately (i.e., page x of y) and listing each appendix and/or attachment in the Table of Contents, if applicable. The total number of pages of each appendix or attachment will also be indicated. This can be accomplished in many ways. Two examples are to include the information on the Table of Contents or on a title page for each appendix or attachment.);
7. field measurement and/or analytical results, including the appropriate units of measurement;
8. unique sample identification, date, time, location and description of field sampling and/or field measurements conducted, including diagrams and photographs, as appropriate;
9. identification of the organization(s) that performed the field sampling, field measurement activities, and/or laboratory analyses;
10. reference to the SESD operating procedures used during the investigation;
11. reference the quality assurance project plan, or the other SESD planning document, the investigation was based upon;
12. identification of the laboratory analytical method(s) used;
13. Results of Field Quality Control Samples;
14. a clear identification of the end of the report (i.e., “End of Report” statement at the end of the report).

Where necessary for the interpretation of the results, field investigation reports will also include the following:

15. identification and explanation of any deviations from, additions to and/or exclusions from the field sampling or field measurement procedure;
16. identification and explanation of any deviations from, additions to and/or exclusions from the QAPP or other SESD planning document;
17. information on specific environmental conditions that may have affected a field measurement or sample;
16. where applicable, a statement on the estimated uncertainty of field measurements;
17. where appropriate and needed, opinions and interpretations. Opinions and interpretations will be clearly identified as such and will include a statement which identifies the basis upon which the opinions and interpretations have been made;
18. additional information which may be required by the requestor.

Any supporting information used in the preparation of the field investigation report will be included in the SESD project file.

As appropriate, SESD field investigation reports will contain the following sections based on project objectives, scope and scale:

1. Cover Page
2. Table of Contents, if applicable
3. Introduction
4. Background
5. Summary
6. Discussion
7. Results of Field Quality Control Samples, if applicable
8. Methodology
9. Conclusions
10. References, Attachments and Appendices, if applicable

Reports written for customers within SESD may be prepared in a simplified manner. The sections listed above should be included as appropriate and as agreed upon between the Project Leader and SESD customer.

2.2 Provisional Release of Final Data

Provisional data refers to final analytical and field measurement results that may be subject to further interpretation and/or data assessment by the project leader prior to the issuance of a final field investigation report. Provisional final laboratory or measurement data may be provided to the customer prior to the completion of the SESD field investigation report only if:

1. SESD management approves the release of the information; and,

2. for analytical data, the results have been released as final from SESD's Analytical Support Branch (ASB) for SESD-generated data, and/or the Quality Assurance Section (QAS) for Non-SESD Laboratories.

Final provisional data that are released prior to report issuance will be transmitted by electronic or hard copy with official correspondence (typically a memo) from the Section Chief, or their designee. The correspondence will include language cautioning the customer on the use of final provisional laboratory or field measurement data. An example of the appropriate language is as follows:

“Per your request, data for the subject project are attached prior to release of the final report. Provisionally released data are results that have been produced and verified by the laboratory and provided to the project leader but the project leader has not completed the data assessment or final report. Additional quality concerns may be identified by the project leader during the data assessment which could impact the usability of the data. Distribution of this data outside of the Agency and making decisions based on provisionally released data are not recommended until the data assessment and final report have been completed.”

As required for all SESD reports, the provisional data report will contain a clear identification of the end of the report (i.e., “End of Report” statement at the end of the report).

Once SESD management has signed the official correspondence, the provisional data report may be transmitted electronically to the customer. Any electronic transmission must show the date, the person transmitting the information and the project identification number. The transmittal, along with the provisional data report, must be documented in the SESD project file by the Project Leader.

If it was stated in the Quality Assurance Project Plan the data and information to be reported is considered confidential enforcement related, all Email correspondence, correspondence sent by regular mail (such as transmittal memo) and fax cover sheets transmitting enforcement documents are clearly marked at the beginning of the document with: ****CONFIDENTIAL ENFORCEMENT-RELATED CORRESPONDENCE. DO NOT RELEASE UNDER FOIA****. Adding a confidentiality notice at the end of the email and fax cover sheet is advisable. The confidentiality notice may read:

This message is a confidential communication related to an enforcement matter. It is intended exclusively for the individuals or entities to whom or to which it is addressed. This communication may contain information which is proprietary, privileged, confidential, or otherwise exempt from disclosure. If you are not the named addressee, you are not authorized to print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately

by email and delete this message. Neither this communication nor any attached document should be released without first consulting an attorney.

For analytical results that have not been finalized and released by the SESD laboratory or QAS, SESD management will determine whether the analytical results will be provided to the customer.

2.3 Draft Reports

Draft field investigation reports that have completed the initial internal SESD review process may be transmitted to the customer for review. Transmittal may be accomplished via hard copy, FAX or electronic transmission. Copies must clearly identify the field investigation report as a draft report. The project leader must document in the SESD project file that the draft report was transmitted and must show the person(s) to whom the report was transmitted. Additionally, the project leader must inform the receiving parties in writing that all electronic and hard copies of the draft field investigation report are no longer valid once they receive the final report. This must also be documented in the SESD project file.

3 Field Investigation Report Review

SESD will conduct an internal review of all field investigation reports prior to transmitting the final report to the customer. The Project Leader is responsible for providing any needed documentation or information to the assigned Reviewer in order to complete the review.

3.1 Compilation of Project Records

Upon completion of a field investigation, the Project Leader will compile all of the necessary project records required to document and support the results of the investigation. This includes the quality assurance project plan, field logbook(s), field checklist(s), Chain of Custody record, Receipt for Samples form, analytical results and other associated materials, as appropriate (e.g., spreadsheets, computer printouts, strip charts, graphs, narrative tables, references, etc.). The Project Leader is responsible for providing the necessary project records to the assigned Reviewer.

3.2 Internal SESD Review

An internal SESD review consists of an administrative review and a technical review. It is the Project Leader's responsibility to verify, to the best of his/her ability, that all of the information submitted in a field investigation report is correct and meets project objectives.

3.2.1 Administrative Review

An administrative review will be conducted to verify that the information presented in the field investigation report is complete, that it is consistent with the requirements of this operating procedure and there are no grammar, spelling, punctuation or general formatting errors. The administrative reviewer will document the review on the SESD Review of Field Investigation Reports Form (SESDFORM-018). The completed form will become part of the SESD project file.

3.2.2 Technical Review

A technical review will be conducted to ensure that the scientific, technical and/or regulatory interpretations are reasonable, consistent, valid and meet the objectives of the field investigation. It is a check that environmental data collection activities support the findings and conclusions. Scientific and technical interpretations reported must fall within the range of acceptable opinions that could be generated by knowledgeable individuals in the field of environmental science and engineering, or be supported by sufficient scientific data.

The technical review will be conducted by a qualified SESD field branch staff member that is familiar with the type of measurements and/or sampling being

conducted. The Section Chief, in consultation with the Project Leader, will assign a technical reviewer. If possible, the technical review will be conducted by an individual independent of the activity being reviewed.

In order to conduct the technical review, the Reviewer will need to obtain the draft report and the associated project records as described in Section 3.1. The Reviewer is expected to verify a percentage of information/data from the field investigation's project records based on project objectives, scope and scale. The percentage of information/data to be verified will be determined by the Project Leader and communicated to the Reviewer prior to the review. At a minimum, 10% of the information/data will be reviewed. In any case, it is at the discretion of the Reviewer to verify any and all project record information that s/he considers necessary in order to conduct an appropriate review.

The technical review will include, as appropriate: verification of field calibration procedures, verification of transcription of field measurement data and analytical results, verification of calculations and/or data reductions, review of scientific, technical and/or regulatory interpretations and conclusions, and all of the requirements listed in the technical review section of the SESD Review of Field Investigation Reports Form (SESDFORM-018). The completed form will become part of the SESD project file.

3.2.3 Records of the Review

The Reviewer will summarize his/her findings on the SESD Review of Field Investigation Reports Form (SESDFORM-018). The Reviewer will address any questions directly with the Project Leader. The Project Leader will resolve the problems, and resubmit the data in question for review if necessary. If the Reviewer and the Project Leader cannot resolve any outstanding issues, then the Project Leader and Reviewer will arrange for the Section Chief, their designee, or a staff expert to assist in resolving the issue.

After the review is completed, the Reviewer will return all project records to the Project Leader.

3.3 External Peer Review

An external peer review may be conducted depending on the nature and complexity of the project as determined by the Project Leader and Section Chief. For the purposes of this operating procedure, an external peer review is considered a review conducted by individuals other than the project requestor and/or outside of EPA Region 4.

If an external peer review is deemed appropriate by the Project Leader and/or Section Chief, the review will be conducted in accordance with the guidance presented in the latest

edition of the EPA Science Policy Council Peer Review Handbook. Externally reviewed draft reports and comments will be included in the SESD project file.

4 Field Investigation Report Approval and Distribution

4.1 Final Report Approval and Distribution

The final report(s) issued for an investigation will be a hard copy version transmitted by official correspondence (typically a memo). The Project Leader is responsible for ensuring that a copy of the final report(s) and transmittal correspondence is retained in the SESD project file.

Final field investigation reports may also be transmitted electronically to customers at any time after the report has completed the internal SESD review process and all signatures are complete on the approval page. The project leader must document in the SESD project file that the report was transmitted electronically and must show the report recipient(s).

If it was stated in the Quality Assurance Project Plan the data and information to be reported is considered confidential enforcement related, Final reports are marked on every page at the top of the document as “ENFORCEMENT CONFIDENTIAL”. Email correspondence, correspondence sent by regular mail (such as transmittal memo) and fax cover sheets transmitting enforcement documents are clearly marked at the beginning of the document with: ****CONFIDENTIAL ENFORCEMENT-RELATED CORRESPONDENCE. DO NOT RELEASE UNDER FOIA****. Adding a confidentiality notice at the end of the email and fax cover sheet is advisable. The confidentiality notice may read:

This message is a confidential communication related to an enforcement matter. It is intended exclusively for the individuals or entities to whom or to which it is addressed. This communication may contain information which is proprietary, privileged, confidential, or otherwise exempt from disclosure. If you are not the named addressee, you are not authorized to print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by email and delete this message. Neither this communication nor any attached document should be released without first consulting an attorney.

Upon completion of the reviews, the Project Leader will transmit the final report to the Section Chief or designee for approval. The Section Chiefs are responsible for ensuring that all reviews are completed, and for approving and authorizing distribution of finalized reports. The Section Chief or designee will distribute the hard copy version of the final report to the customer.

4.2 Amendments or Revisions to Field Investigation Report

If, after the issue of a report, an “amendment” or “revision” is required, they will be issued under the same project identification number. The Section Chief will be responsible for determining if the report will require an amendment or a revision.

A revision is in order if, field sampling or measurement results are found to be invalid, incorrect or inaccurate, and have an impact on the scientific interpretations or decision making process.

An amendment is a correction of portions of the original report that provides additional clarity and does not impact scientific interpretations or the decision making process.

The revision or amendment will be prepared, reviewed and distributed in accordance with this procedure, clearly identified as an revision or amendment, contain a reference to the original that it replaces, includes a revision history, and will be included in the SESD project file. For a revision, the original will be marked as obsolete and maintained in the project file. The revised report will be distributed to all original recipients with a cover memorandum indicating the revised report super cedes the original. In rare cases, if deemed necessary by the Section Chief, a revision may be issued under a new project identification number and must contain a reference to the original that it replaces.

Amendments will be, at the discretion of the Section Chief, reviewed in accordance with this procedure. Amendments will include a revision history and will be distributed in accordance with this procedure. For amendment, the original will be marked as “superseded” and maintained in the project file. The amendment will be distributed to all original recipients with a cover memorandum indicating the amendment super cedes the original.

5 Results Obtained from Sources Outside of SESD's Quality System

When field measurements, sampling activities or laboratory analyses are conducted by sources not covered under the scope of the SESD field branches quality system and are included in SESD field investigation reports, the source of those results will be clearly identified in the report. These organizations may include: SESD's Analytical Support Branch, Contract Laboratory Program (CLP) laboratories, Superfund Technical Assistance and Response Team (START) contactors, States, Regulated Facilities and other Federal Agencies.