

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

SUBJECT: Clarification to Region III Policy on Program QAPPs

FROM: Terry Simpson, Regional QA Manager
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TO: Region III Quality Assurance Coordinators

Purpose

This memorandum serves to clarify Region III policy with respect to Quality Assurance Project Plans (QAPPs), as presented in the [Region III Quality Management Plan](#), Sections B.3.b. and B.3.c.

Background

[EPA CIO Policy 2105.0](#) requires that a QAPP be prepared and approved for all environmental data activities performed by or on behalf of EPA prior to the initiation of those data activities (see Section 6.a.7.). Quality specifications for non-EPA organizations are defined in the Code of Federal Regulations and EPA has published documents which provide information on satisfying the Federal Regulations for organizations receiving financial assistance from EPA through extramural agreements (e.g., contracts, grants, cooperative agreements, and interagency agreements). These documents are entitled [EPA Requirements for Quality Assurance Project Plans \(EPA QA/R-5\)](#) and [Guidance for Quality Assurance Project Plans \(EPA QA/G-5\)](#), commonly referred to as R-5 and G-5 respectively. The R-5 document provides the specifications for satisfying the requirements set forth in EPA regulations (the what) and the G-5 document provides guidance for implementing the requirements (the how).

Clarification of Region III Quality Assurance Policy

Region III supports the use of two types of QAPPs, as defined in the [Region III Quality Management Plan](#); project-specific QAPPs (Section B.3.b) and Program QAPPs (also referred to as QAPrPs) (Section B.3.c). The Region encourages the use of Program QAPPs whenever practicable and are typically used to describe QA/QC procedures across recurring or like activities within a single program. The Program QAPP shall describe the quality assurance (QA) elements that remain constant among the different projects, activities, or sites. Most Program QAPPs shall be supported by project-specific, activity-specific or site-specific documentation (e.g., Field Sampling Plans, Sampling and Analysis Plans, Work Plans, inspection checklists, or equivalent). These documents shall address the specific QA elements that are articulated in EPA's R-5 and G-5 guidance documents and are unique to each project, activity, or site.



One such EPA program, the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), has developed specific guidance to assist with the development of QAPPs for the conduct of FIFRA pesticide programs. The [Guidance for Quality Assurance Project Plan Development for EPA Funded Cooperative Agreements with State and Tribal Agencies for the Conduct of FIFRA Pesticide Programs](#) is an Agency product developed from a need identified by states and tribes because the Agency's R-5 and G-5 guidance did not fit well with FIFRA program activities. The R-5 and G-5 documents are consistently phrased in terms of "projects", where FIFRA program activities are smaller in nature and consist of on-going or recurring enforcement and compliance responsibilities (i.e., inspections and investigations).

Region III supports the development of Program QAPPs for FIFRA activities conducted by the States and Tribes as long as they comply with the [Guidance for Quality Assurance Project Plan Development for EPA Funded Cooperative Agreements with State and Tribal Agencies for the Conduct of FIFRA Pesticide Programs](#). It is our view that QAPPs developed in accordance with this guidance document and supplemented with project-specific, activity-specific or site-specific documentation as described above equates to compliance with the Agency's R-5 and G-5 documents. Region III has reached this conclusion because the FIFRA QAPP guidance specifically calls out each QA requirement, as stated in the R-5 document, and then provides suggestions and examples to include in the Program QAPP in order assist state and tribal organizations with direction that satisfies the stated requirement. Under these circumstances, Region III believes that a state or tribal pesticide program should be able to produce a single Program QAPP along with the project-specific, activity-specific or site-specific supporting documentation that will cover its recurring data gathering activities.

It should be noted here, that the FIFRA QAPP guidance applies only to pesticides programs. Other programs, such as but not limited to RCRA Subtitle C – Hazardous Waste Programs, RCRA Subtitle I - Underground Storage Tanks and Leaking Underground Storage Tanks, TSCA Lead and PCB Monitoring, CAA Asbestos NESHAP requirements and Brownfields may also benefit from single Program QAPPs; however, program-specific guidance should be used to develop such QAPPs. Links to EPA-approved program-specific guidance mentioned herein are listed below for your reference. Consultation with the Division/Office QA Coordinator and/or the Regional Quality Assurance Manager before instructing any Region III state or tribal entity to develop a Program QAPP is strongly encouraged.

This clarifying information is being provided for your general QA awareness and that of the project managers/officers in your Divisions/Offices. Please share this information with those individuals that may be affected by this guidance.

This memorandum will be appended to the existing Region III Quality Management Plan, until such time as it is revised and resubmitted for Agency approval. At that time, this information will be incorporated into the appropriate Sections B.3.b. and B.3.c.

As always, I am available anytime for questions or concerns.



References

Generic Quality Assurance Project Plan for a State RCRA Subtitle C or LUST or UST Program

Get the Lead Out – EPA Region III Guidance for Preparing Lead-Monitoring Project Plans
Asbestos Inspector's Guidance Library

Region III Interim Final Brownfields Quality Assurance Project Plan Template

EPA Region 9 Guidance for Quality Assurance Program Plans - R9 QA/03.2

