

Appendix C: Sample Justification for WQX

As mentioned in Chapter 6, a Tribe's justification for waiving submission to EPA's Water Quality Exchange (WQX) should include: a description of the limitation or impediment to water quality data entry directly to WQX (see text box for examples), a proposed plan to address the issue, and a proposed time frame to meet the programmatic reporting requirement. Information in the justification will assist EPA in addressing barriers to data submission to WQX, where possible. Until the Tribe overcomes their limitation or impediment, they will send WQX compatible data and justification details to their EPA Regional Project Officer in accordance with the annual milestone due date in their yearly or multiyear grant work plan.

Justification examples:

- Inadequate internet access.
- Funding limitations.
- Loss of key staff.
- Training needed.

Below is an *example* of what a Tribe's justification might look like. EPA regions and Tribes may use the items below as a template, if applicable.

Name of Tribe: _____

Grant time period: _____

Description of the limitation or impediment to entering water quality data directly to WQX:

My Tribe has lost key staff and our current staff need training. These two barriers prevent us from entering our water quality data directly to WQX.

Proposed plan to address the issue:

We would like to hire key staff to support entering our data to WQX. Training for our staff and the costs for such training opportunities are included in our Section 106 work plan. We will seek training opportunities that are specific to managing water quality data and uploading data to WQX. If we cannot find such training opportunities, we will seek help from our EPA Project Officer.

We will keep our EPA Project Officer updated on any issues. We will also include this topic as part of our program evaluation with our EPA Project Officer at the end of our grant period to discuss our progress toward addressing these issues.

Proposed time frame to meet the programmatic reporting requirement:

As of now, my Tribe will begin addressing the issues outlined above. We propose that we can begin entering our water quality data directly to WQX by the Summer of 20XX.

Until my Tribe overcomes the limitation/impediment described above, we agree to provide water quality data in a WQX compatible format.

Signature of Tribe: _____

Signature of EPA Project Officer: _____

Date: _____