

MEMORANDUM FOR – See e-mail distribution list

SUBJECT: DOD/Army/USACE Implementation of the Uniform Federal Policy for Quality Assurance Project Plans

The Assistant Deputy Under Secretary for Defense (Environment, Safety and Occupational Health), Alex Beehler, issued a letter to DOD components on April 11, 2006 regarding implementation of the Uniform Federal Policy for Quality Assurance Project Plans. (See attachment) Following is an excerpt from this letter:

In March 2005, Thomas Dunne, Acting Administrator for the U.S. EPA Office of Solid Waste and Emergency Response (OSWER) joined me in signing the Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP), thereby formally adopting the policy for use at Federal facility hazardous waste sites. Recently, EPA issued a directive and guidance for EPA Regions to require use of the UFP-QAPP for collection of data at Federal facility hazardous waste sites involving CERCLA, RCRA, and Brownfields type projects. The purpose of this memorandum is to request that Components begin immediate implementation of the policy.

Note, once DOD formally adopted the policy in March 2005, the UFP QAPP became mandatory for new QAPP development for DOD. (See attachment) The timing of this mandatory implementation by Army/USACE is all that is left to be clarified. From our understanding as a member of the DOD Environmental Data Quality Workgroup, the letter dated April 11 was the first step in implementation for the Army and USACE. The next step, issuance of a DOD-Instruction followed by issuance of the UFP QAPP as a DOD Manual, was accomplished via DOD Instruction 4715.15 dated 11 December 2006. (See attachment) (Note this Instruction also clarified that implementation of the UFP QAPP applies to the FUDS Program.) A possible additional step will be a DOD/Army request for a specific implementation schedule for the DOD UFP QAPP Manual at the Major Command and program level. At this point it is apparent that an official mandate for USACE implementation is at least some time in the future. However, it should also be noted that EPA Regional staff have also been directed to accept QAPPs from Federal Facilities, produced in accordance with the UFP Guidance as acceptable, and as equivalent to EPA G-5. (see attachment 1 and attachment 2) Based on this knowledge, USACE District PDTs, at the request of an EPA regulator or customer (i.e. EPA Superfund IAGs), may “voluntarily” produce a site/project specific QAPP in accordance with the UFP QAPP Manual.

Since implementation of the UFP QAPP is inevitable, it would be appropriate for USACE PDT members to avail themselves of training currently being offered for the UFP QAPP. Currently there are 1-day (for PMs) and 2-day (for technical staff) courses available, with instruction materials for a ½ day class recently issued. To date the 2-day training has been offered at several EPA Regional headquarters offices. These offerings are free to attendees. This spring, there are plans to offer it in Philadelphia (1/23-24), San

Francisco (2/14-15), Chicago (2/21-22), and Denver (3/27-28). Use the following [weblink](#) for registration information: The 1-day course has been offered in conjunction with a recent DOD EM and DQ Workshop. This and the ½ day course will likely be offered at DOD/Army/USACE meetings in the current fiscal year. Additional information on such offerings will be provided by this office when available.

The POC in this office for the UFP QAPP is Jan Dunker. He can be reached at 402-697-2566. Additional information on the UFP QAPP, including the document itself, can be found at the following [weblink](#).

/s/ Kevin H. Coats
Chief – Environmental Sciences Branch
USACE Hazardous, Toxic, and Radioactive
Waste Center of Expertise



OFFICE OF THE UNDER SECRETARY OF DEFENSE
3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

APR 11 2006

ACQUISITION,
TECHNOLOGY
AND LOGISTICS

MEMORANDUM FOR DEPUTY ASSISTANT SECRETARY OF THE ARMY
(ENVIRONMENT, SAFETY AND OCCUPATIONAL
HEALTH),
DEPUTY ASSISTANT SECRETARY OF THE NAVY
(ENVIRONMENT)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE
(ENVIRONMENT, SAFETY AND OCCUPATIONAL
HEALTH),
DIRECTOR DEFENSE LOGISTICS AGENCY (DSS-E),

SUBJECT: Uniform Federal Policy for Quality Assurance Project Plans

In March 2005, Thomas Dunne, Acting Administrator for the U.S. EPA Office of Solid Waste and Emergency Response (OSWER) joined me in signing the Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP), thereby formally adopting the policy for use at Federal facility hazardous waste sites. Recently, EPA issued a directive and guidance for EPA Regions to require use of the UFP-QAPP for collection of data at Federal facility hazardous waste sites involving CERCLA, RCRA, and Brownfields type projects. The purpose of this memorandum is to request that Components begin immediate implementation of the policy.

The UFP-QAPP provides project-level guidance for implementing the systematic planning process for environmental data collection, based on the American National Standard ANSI/ASQ E4-2004. It is the product of an extensive, collaborative effort involving EPA, DoD and DOE personnel. Although originally written for hazardous waste programs at federal facilities, it provides guidance suitable for a wide range of environmental data collection activities (e.g. compliance monitoring), and I encourage its use for those purposes.

The UFP-QAPP and associated support tools are available at www.epa.gov/fedfac/documents/qualityassurance.htm. For training course information or technical matters, please contact your Environmental Data Quality Workgroup (EDQW) representative, or Mr. Edward Hartzog, EDQW Chair, in the Navy Laboratory Quality and Accreditation Office, (843) 764-7337, email: hartzogEB@navsea.navy.mil. My office's point of contact is Mr. Ed Miller, (703) 604-1765, email: edmund.miller@osd.mil.

Alex A. Beehler

Assistant Deputy Under Secretary of Defense
(Environment, Safety and Occupational Health)



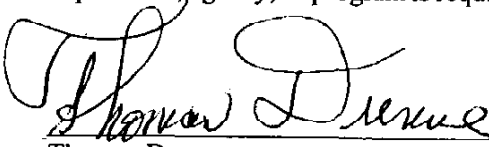
FOREWORD

Part 1 of the Uniform Federal Policy for Quality Assurance Project Plans (the UFP-QAPP Manual) is a consensus document prepared by the Intergovernmental Data Quality Task Force (IDQTF). It provides instructions for preparing Quality Assurance Project Plans (QAPPs) for any environmental data collection operation. The purpose of the UFP-QAPP Manual is to implement the project-specific requirements of ANSI/ASQ E4, *Quality Systems for Environmental Data and Technology Programs - Requirements with guidance for use, Section 6 (Part B)*. The *Uniform Federal Policy for Implementing Environmental Quality Systems (UFP-QS)* was developed by the IDQTF to implement Section 5 (Part A) of ANSI/ASQ E4.

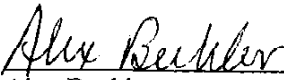
Though the UFP-QAPP Manual is a consensus policy document, it becomes mandatory for new QAPP development for any government department, agency, or program that voluntarily adopts the policy. As is described in the Executive Summary and Introduction, use of the UFP-QAPP Manual will be phased in over time as contracts allow and new QAPPs are required.

Although this UFP-QAPP Manual was initially written for hazardous waste programs and Federal agencies, the IDQTF recognizes that it provides suitable guidance for a wide range of other environmental data collection activities (e.g., permitting, compliance) and anticipates that the policy may be adopted by other programs (e.g., water, air) and by private parties as well as by other Federal agencies, States, and Tribes. Programs and agencies that voluntarily adopt the policy requirements of the UFP-QAPP Manual will be noted on the following Website: http://www.epa.gov/fedfac/documents/intergov_qual_task_force.htm.

Because adoption of the requirements of this UFP-QAPP Manual by Federal departments, agencies, or programs is voluntary, failure to use this guidance is not subject to enforcement action. However, once adopted, the use of this UFP-QAPP Manual and oversight by the adopting Federal department, agency, or program is required to ensure a consistent approach to QAPP development.


Thomas Dunne
Acting Assistant Administrator for Solid Waste and Emergency Response
U.S. Environmental Protection Agency

11/11/04
Date


Alex Beehler
Assistant Deputy Undersecretary of Defense
(Environment, Safety, and Occupational Health)


3/17/05
Date


John Spitaleri Shaw
Acting Assistant Secretary for Environment, Safety and Health
U.S. Department of Energy

Date

REVISION

The *Uniform Federal Policy for Implementing Environmental Quality Systems: Evaluating, Assessing, and Documenting Environmental Data Collection/Use and Technology Programs* (UFP-QS) was originally approved in January 2003. Version 2.0 of this policy includes an additional appendix (Appendix G, Federal Quality Systems Roles and Responsibilities Guidance) which establishes general principles for the roles and responsibilities relating to environmental data collection and use at Federal facilities. Version 2.0 supercedes the Final Version 1 from January 2003.


Thomas Dunne 11/1/04
Date
Acting Assistant Administrator for Solid Waste and Emergency Response
U.S. Environmental Protection Agency


Alex Beehler 3/17/05
Date
Assistant Deputy Undersecretary of Defense
(Environment, Safety, and Occupational Health)

John Spitaleri Shaw Date
Acting Assistant Secretary for Environment, Safety and Health
U.S. Department of Energy



Department of Defense

INSTRUCTION

NUMBER 4715.15
December 11, 2006

USD(AT&L)

SUBJECT: Environmental Quality Systems

- References:
- (a) Deputy Secretary of Defense Memorandum, "Ensuring the Quality of Information Disseminated to the Public by the Department of Defense," February 10, 2003
 - (b) DoD Directive 4715.1E, "Environment, Safety, and Occupational Health," March 19, 2005
 - (c) DoD 5025.1-M, "DoD Directives System Procedures," March 2003
 - (d) ANSI/ASQ E4-2004, "Quality Systems for Environmental Data and Technology Programs – Requirements with guidance for use"¹
 - (e) ISO/IEC 17025:1999, "General Requirements for the Competence of Testing and Calibration Laboratories," December 1999²
 - (f) Federal Register, Volume 67, page 8452, February 15, 2002

1. PURPOSE

This Instruction:

1.1. Establishes and implements policy for establishing environmental quality systems for DoD activities and programs involving the collection, management, and use of environmental data, in accordance with References (a) and (b).

1.2. Assigns responsibilities for implementing Reference (a) and provides for a DoD Environmental Data Quality Workgroup (EDQW).

1.3. Authorizes the publication of DoD 4715.RR-M-1 "Department of Defense Quality Systems Manual for Environmental Laboratories," DoD 4715.RR-M-2, "Uniform Federal Policy for Implementing Environmental Quality Systems," DoD 4715.RR-M-3 "Uniform Federal Policy for Quality Assurance Project Plans," and other issuances supporting this Instruction and consistent with Reference (c).

¹ Published by the American National Standards Institute, www.ansi.org

² Published by the International Organization for Standardization, www.iso.org

2. APPLICABILITY AND SCOPE

2.1. This Instruction applies to:

2.1.1. The Office of the Secretary of Defense (OSD), the Military Departments, the Chairman of the Joint Chiefs of Staff, the Combatant Commands, the Office of the Inspector General of the Department of Defense, the Defense Agencies, the DoD Field Activities, and all other organization entities within the Department of Defense (hereafter referred to collectively as the “DoD Components”).

2.1.2. Activities and programs involving the collection, management, and use of environmental data, supporting all applicable laws and regulations, at DoD operations, activities, and installations worldwide, including Government-owned/contractor-operated facilities and formerly-used defense sites (FUDS).

2.2. This Instruction does not apply to:

2.2.1. Contractor-owned and contractor-operated facilities that are not on real property owned and controlled by the Department of Defense.

2.2.2. Radiological data collected under the Naval Nuclear Propulsion Program.

3. DEFINITIONS

Terms used in this Instruction are defined in Enclosure 1.

4. POLICY

It is DoD policy to:

4.1. Comply with the DoD Information Quality Guidelines in accordance with Reference (a).

4.2. Work with all appropriate regulatory authorities and land management agencies, including those representing the Federal Government, and State, Indian tribal, and local governments, to improve the planning, collection, and use of environmental data.

4.3. Implement environmental data quality systems for the collection and use of environmental data consistent with the American National Standards Institute (ANSI)/American Society for Quality (ASQ) standard E4-2004 (Reference (d)) and the International Organization for Standardization (ISO)/International Electrotechnical Commission (IEC) standard 17025 (Reference (e)).

5. RESPONSIBILITIES

5.1. The Deputy Under Secretary of Defense for Installations & Environment (DUSD(I&E)), under the Under Secretary of Defense for Acquisition, Technology, and Logistics, shall:

5.1.1. Ensure the use of quality environmental data for the environmental, safety, and occupational health programs.

5.1.2. Develop such DoD issuances as necessary to implement environmental quality systems.

5.2. The Assistant Deputy Under Secretary of Defense for Environment, Safety, and Occupational Health (ADUSD(ESOH)), under the DUSD(I&E), shall:

5.2.1. Provide coordination and oversight to promote the consistent implementation of environmental quality systems within the Department of Defense.

5.2.2. In consultation with the affected Military Department(s), represent the Department of Defense in resolving intergovernmental and interdepartmental policy disagreements concerning environmental data quality issues.

5.2.3. Review and submit DoD budget requests to implement this Instruction.

5.2.4. In accordance with Reference (c), prepare DoD issuances for the approval of DUSD(I&E).

5.2.5. Include environmental data quality in periodic management reviews.

5.2.6. Oversee management of the DoD EDQW, issue its charter, and appoint its chair.

5.3. The Heads of the DoD Components shall:

5.3.1. Comply with this Instruction.

5.3.2. Implement environmental quality systems for DoD Component-level activities and operations related to environmental data collection and use.

5.3.3. Establish programs to monitor and achieve progress toward the implementation of environmental quality systems.

5.3.4. Plan, program, and budget for the implementation of environmental quality systems, consistent with environmental laws and regulations, DoD guidance, and fiscal policies.

5.3.5. Conduct quality assurance surveillance and include environmental data quality in periodic management reviews as required by DUSD(I&E).

5.3.6. Implement any necessary corrective action identified during quality assurance surveillance activities and management reviews.

5.4. The Director of the Defense Logistics Agency, under the authority, direction, and control of the USD(AT&L), and the Secretaries of the Military Departments, in addition, shall:

5.4.1. Provide Component Principals (senior military or civilian government officials) with the authority to recommend resources and policy to their respective Components to support the EDQW.

5.4.2. Provide one or more offices or organizations to participate in the EDQW and in the development and maintenance of DoD publications authorized by this Instruction.

5.5. The Secretary of the Navy, in addition, shall:

5.5.1. In coordination with the Heads of DoD Components, develop for approval by the ADUSD(ESOH) a charter outlining functions and responsibilities for the EDQW and nominate an EDQW chair to the ADUSD(ESOH).

5.5.2. Plan, program, and budget for activities necessary to support operation of the EDQW.


5.5.3. Manage DoD Component coordination of proposals by the EDQW, before presentation to the ADUSD(ESOH).

5.5.4. Raise emerging DoD environmental data quality, sampling, and testing issues with the appropriate DoD Components.

5.5.5. Provide Measures of Merit for monitoring progress in implementing environmental quality systems, in accordance with Enclosure 2.

6. EFFECTIVE DATE

This Instruction is effective immediately.



Kenneth J. Krieg
Under Secretary of Defense for
Acquisition, Technology, and Logistics

Enclosures – 2

E1. Definitions

E2. Measures of Merit

E1. ENCLOSURE 1

DEFINITIONS

E1.1. Environmental Data. Any measurement or information that describes environmental processes, locations, or conditions; ecological or health effects and consequences; or the performance of environmental technology (Reference (d)).

E1.2. Quality. An encompassing term, of which utility, objectivity, and integrity are the constituents. Utility refers to the usefulness of the information to the intended users. Objectivity focuses on whether the disseminated information is being presented in an accurate, clear, complete, and unbiased manner, and as a matter of substance, is accurate, reliable, and unbiased. Integrity refers to security – the protection of information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification (67 FR 8452) (Reference (f)).

E1.3. Quality System. A structured and documented management system describing the policies, objectives, principles, organizational authority, responsibilities, accountability, and implementation plan of an organization for ensuring quality in its work processes, products (items), and services (Reference (d)).

E1.4. State. Includes the 50 states and the District of Columbia, the Commonwealth of Puerto Rico, Guam, the Virgin Islands, and American Samoa.

E2. ENCLOSURE 2

MEASURES OF MERIT

E.2.1. Ensure that milestones established in DoD Component quality systems implementation plans are met.

E.2.2. Ensure that DoD procurement actions require compliance with the DoD Quality Systems Manual.

E.2.3. Ensure environmental restoration and compliance programs conduct sampling and testing according to the documents authorized by this Instruction.

E.2.4. Ensure appropriate and adequate Quality Management Plans are developed as authorized by this Instruction.

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

JUN 7 2005

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

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

FROM: Thomas P. Dunn
Deputy Assistant Administrator

TO: Regional Administrators, Regions I-X

PURPOSE:

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

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

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

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

BACKGROUND:

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

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

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

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

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

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

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

IMPLEMENTATION:

Scope

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

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

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

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

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

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

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

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

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

Implementation Assistance:

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

CONCLUSION:

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

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

Mike Carter
Federal Facilities Restoration and Reuse Office
703-603-0046
carter.mike@epa.gov

Attachment

cc w/o attachment: Kim Nelson, OEI
 Tom Skinner, OECA
 Jeff Holmstead, OAR
 Ben Grumbles, OW
 Kathy Callahan, Region 2
 RS&T Directors
 Federal Facilities Leadership Council
 Regional QA Managers
 Superfund National Program Managers (Regions I-X)
 RCRA National Program Managers (Regions I-X)
 IDQTF Members



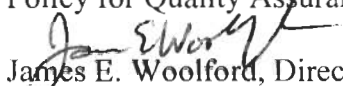
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460


DEC 21 2005

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: OSWER Guidance 9272.0-20: Applicability of the Uniform Federal Policy for Quality Assurance Project Plans (EPA 505-04-900A)

FROM: 
James E. Woolford, Director
Federal Facilities Restoration and Reuse Office

Reggie Cheatham, Director 
Quality Staff
Office of Environmental Information

TO: Regional Science and Technology Directors

The Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP) has been approved by the Office of Solid Waste and Emergency Response (OSWER) and the Department of Defense (DoD) for use at federal facility hazardous waste sites. The purpose of this Memorandum is to inform you that Quality Assurance Project Plans prepared and approved according to the UFP-QAPP meets all the requirements of *EPA Requirements for Quality Assurance Project Plans, (QA/R-5)* issued by the Quality Staff of the Office of Environmental Information.

The Policy is based on the American National Standard *Quality systems for environmental data and technology-Requirements with guidance for use (ANSI-ASQ E4-2004)*, the same National Consensus Standard used for QA/R-5. The UFP-QAPP addresses elements common to all environmental data collection, beginning with identifying environmental decisions that need to be made and determining the type, quantity and quality of data necessary to support those decisions. Environmental decision making can range from proposing a site for addition to the Superfund National Priorities List to determining compliance with a discharge permit. In addition, use of the UFP-QAPP will help to ensure the quality, objectivity, utility and integrity of environmental data as required by the Data Quality Act and Information Quality Guidelines issued by EPA and the Office of Management and Budget¹.

Heretofore, the primary focus of environmental data quality assessment has been the performance of analytical laboratories. The intergovernmental work group that developed

¹ For more information, see <http://www.epa.gov/quality/informationguidelines/index.html>

the UFP-QAPP elected to take on topics that had not been addressed in the past, beginning with the adequacy of sampling plan design, through field sampling activities, to data review, with an emphasis on the quality of data, related to the decision that requires environmental data. The diversity of the workgroup members, from the organizations they represented to their individual technical disciplines meant that, while extra effort was required, the end result is both flexible and robust. The value of the UFP-QAPP and its ancillary features are already apparent.

The UFP-QAPP includes implementation support tools. Implementation tools include worksheets that can provide both a consistent format for QAPPs and assurance that necessary requirements are addressed. The UFP-QAPP is currently in use by several EPA Regions for federal facilities as well as other fund lead and responsible party lead Superfund projects, approach and been demonstrated to be helpful and effective in improving QAPP planning and implementation. Use of this tool makes both preparation and review of QAPPs much more efficient and timely. Another, unique, tool is the Quality Assurance/Quality Control (QA/QC) Compendium. The Compendium provides extensive recommendations on QA/QC measures to support various end uses of data, such as for risk assessment. Suitable QA/QC meta-data is a requirement for both objective data review and to meet Information Quality Guidelines criteria.

OSWER's Federal Facilities Restoration and Reuse Office and the Department of Defense have developed a training curriculum on the use of the UFP-QAPP. The training includes a video describing the role of managers in assuring the development and use of appropriate Quality Assurance Project Plans for environmental data collection. Instruction materials consist of two computer-based modules that provide orientation and are a prerequisite for a two day classroom course. The training is provided by the U.S. Navy under an Interagency Agreement and is open to federal and state employees. Contractors may also participate with sponsorship by government contract managers if the training is directly related to the contract statement of work.

The UFP-QAPP and the associated implementation support tools are available at www.epa.gov/fedfac/documents/intergov_qual_task_force.htm. An OSWER Directive on implementation of the Policy is also available on this site. Information on the training course and the schedule are available at:

<https://www.cecos.navy.mil/coursedetail.cfm?CourseID=76>

While the initial focus of the UFP-QAPP development was on Federal Facility response actions under CERCLA and RCRA, the potential utility to other programs is clear. We strongly encourage all EPA programs to consider the use of the UFP-QAPP and its ancillary support tools for planning and carrying out environmental data collection. The obligations of EPA and the federal government to provide data that meet the need for quality, objectivity, utility and integrity are well served by the use of the UFP-QAPP.

For additional information or questions, feel free to contact Mike Carter of the Federal Facilities Restoration and Reuse Office, 703-603-0046, email carter.mike@epa.gov or the chair of the UFP-QAPP workgroup, Robert Runyon of Region 2, 732-321-6645. email runyon.robert@epa.gov.

cc: Regional Superfund Division Directors
Kevin Phelps, OSWER
Robert Runyon, Region 2
Mike Carter, FFRRO
Esperanza Renard, Quality Staff
Ed Hartzog, DoD/Navy
George Detsis, DOE
Lora Johnson, ORD-NERL-Cincinnati
Tai-Ming Chang, Region 3