



**United States Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103**

**QUALITY MANAGEMENT PLAN  
FOR THE  
OFFICE OF ENFORCEMENT, COMPLIANCE &  
ENVIRONMENTAL JUSTICE**

**QMP-OECEJ-2016-001-00**

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**Effective Date: May 13, 2016**

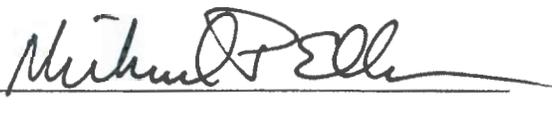
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**Concurrences and Approvals**

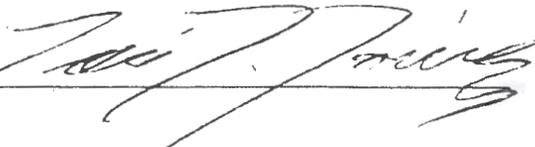
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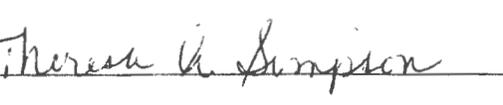
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## **Acronyms**

AHERA: Asbestos Hazard Emergency Response Act

ASHAA: Asbestos School Hazard Abatement Act

BEN: OECA's Model to determine economic benefits from noncompliance

CERCLA: Comprehensive Environmental Response, Compensation And Liability Act

COR: Contracting Officer's Representative

CSB: Computer Services Branch

DQOs: Data Quality Objectives

EAID: Environmental Assessment and Innovation Division

ECMS: Enterprise Content Management System

EJSCREEN: Environmental Justice Screen

EPA: Environmental Protection Agency

FAR: Federal Acquisition Regulations

FIFRA: Federal Insecticide, Fungicide, and Rodenticide Act

FITL: Field Investigations Team Leader

FLIR: Forward Looking Infrared

IA: Interagency Agreements

ICIS: Integrated Compliance Information System

IQG: Information Quality Guidelines

ISB: Information Services Branch

MOU: Memorandum of Understanding

LCD: Land and Chemicals Division

NESHAP: National Emissions Standards for Hazardous Air Pollutants

OASQA: Office of Analytical Services and Quality Assurance

OECEJ: Office of Enforcement, Compliance and Environmental Justice

OIG: Office of Inspector General

OPM: Office of Policy and Management

ORC: Office of Regional Counsel

PCB: Polychlorinated Biphenyl  
PE: Performance Evaluation  
PM: Program Manager  
QA: Quality Assurance  
QAC: Quality Assurance Coordinator  
QAM: Quality Assurance Manager  
QAPP: Quality Assurance Project Plan  
QAT: Quality Assurance Team  
QC: Quality Control  
QMP: Quality Management Plan  
QSA: Quality System Assessment  
RAV: Report A Violation  
RCRA: Resource Conservation and Recovery Act  
RQAA: Regional Quality Assurance Assessment  
RQAM: Regional Quality Assurance Manager  
RQC: Regional Quality Council  
SAP: Sampling and Analysis Plan  
SOP: Standard Operating Procedure  
TSA: Technical Systems Audit  
TSCA: Toxic Substances Control Act  
WAM: Work Assignment Manager  
XRF: X-Ray Fluorescence

# Office of Enforcement, Compliance & Environmental Justice

## Quality Management Plan

### 1.0 Management and Organization

#### 1.1 OECEJ Quality Assurance Policy

##### 1.1.1 Purpose and Background

The Office of Enforcement, Compliance and Environmental Justice (OECEJ) has a wide range of activities that provide services to external customers (e.g., inspections and sampling for other divisions). Also, activities related to OECEJ programs and projects (e.g., data management, state oversight, grant management).

The OECEJ's Quality Management Plan (OECEJ's QMP) defines and describes the OECEJ's quality management system, including the office's policies and responsibilities. This document is intended to assist the OECEJ's staff including Project Officers (POs) and Managers in the uniform implementation of Quality Assurance (QA) requirements for all environmental data collection activities to better assist our customers and office's needs.

OECEJ is committed to good science and to the implementation of a sound quality management system. This commitment is consistent with the goals of the Administrator's Quality Assurance Policy Statement, EPA Order 5360.1 A2 ("Policy and Program Requirements for the Mandatory Agency-Wide Quality System"), and the Quality Management Plan for EPA Region III.

OECEJ has already developed and integrated QA practices into its environmental data collection activities. These practices are specifically designed to generate and process environmental data of known and acceptable quality.

##### 1.1.2 OECEJ Quality Management Policy

The OECEJ Quality Management Policy (the OECEJ policy) is that appropriate QA activities shall be designed and implemented within the office to insure that all environmental data generated and processed shall be: scientifically valid, of adequate statistical quality, of known precision and accuracy, of acceptable completeness, representativeness, and comparability, and where appropriate, legally defensible. This goal can be achieved by insuring that appropriate QA procedures are used throughout the environmental data collection process from project design through data usage.

OECEJ policy shall comply with EPA Order 5360.1 A2 which requires a Quality Assurance Project Plan (QAPP) for all environmental data collection activities. Environmental data collection activities are defined as the collection or generation of information or measurements resulting from any field data collection activity, laboratory analyses or models involving the assessment of chemical, physical or biological factors relating to the environment. Data collection activities include those activities in which data is generated both by and for the office

and/or with office's funds. EPA Order 5360.1 A2 also applies to the use of environmental data collected for other purposes or from other sources (so called secondary data), including literature, industry surveys, compilations from computerized data bases, and information systems, results from computerized or mathematical models of environmental processes and conditions.

Specifically it is the OECEJ policy that:

- The generation of environmental data shall occur only in accordance with the procedures set forth in relevant generic or project-specific QAPPs. For any specific environmental data collection activity, the QAPP will specify the detailed procedures required to assure the generation of quality data. All QAPPs must be approved prior to data collection, except in the unlikely event that environmental data is generated for an emergency situation. In this case, an evaluation of the procedures used to generate the data will be made at the earliest opportunity following the emergency situation.
- All environmental data generated shall be of known and acceptable quality. The data quality information developed with all environmental data shall be documented and available.
- All OECEJ's environmental data collection programs shall insure that acceptable QA requirements are included and implemented in all applicable data collection activities conducted directly by or funded by the OECEJ.
- The intended use(s) of the environmental data shall be defined before the data collection activities begin, so that appropriate QA standards may be applied to that activity. The level of data quality shall be determined by considering the prospective data needs of all identified data users. Data Quality Objectives (DQOs) shall be established to insure the utility of the environmental data for its intended use(s), and as a guide for preparation of the QAPP. Intended environmental data uses, level of quality, specific QA activities, and data acceptance criteria related to data quality needs shall be described in each data collection activity's QAPP.
- The OECEJ will require any external organization that performs work for programs administered by the office to have a quality system that is documented in an approved QMP.

## 1.2 Scope of the OECEJ Quality Management Plan

The OECEJ's QMP is applicable to all office programs and activities that implement environmentally related data-gathering activities. This includes field and laboratory data-generated activities or investigations that involve the determination of chemical, physical, or biological characteristics related to the environment, as established in EPA Order 5360.1 A2, use of data generated by other organizations to establish criteria, standards, or the promulgation of guidance or regulations requiring the collection of data by grantees or the regulated community.

The following OECEJ programs meet the criteria established by the definition of environmentally related data and data gathering activities and are covered by the OECEJ's QMP:

- Inspections
- Sampling
- Enforcement

The following also meet the criteria established by the definition of environmentally related data and data gathering activities and they will be incorporated into the OECEJ's QMP:

- Environmental Justice Small Grants Program
- State Review Framework
- ICIS Coordination, Data Entry and Analysis
- RAV

It is the OECEJ policy that QA issues be addressed during all appropriate planning, design, and implementation and assessment phases of a program or project. QA is applicable to the following program components within the OECEJ. These are:

- Development of policies or guidance that involve data collection activities
- Development of methods or protocols
- Analytical method validation
- Monitoring
- Data quality assurance
- Information Management
- Compliance and enforcement
- Procurement of supplies and services
- Oversight
- Training

Not all programs will include all of the program components listed. However, it is the OECEJ policy that when these components are part of a program, the appropriate QA activities are incorporated.

## 2.0 Description of OECEJ's Quality System

Sections A.2. and A.8. of the Region III Quality Management Plan (RQMP) mandate that a total Quality Management System be created and implemented by each Division. Section 2 of the OECEJ QMP describes the tools that are used to insure uniform implementation of QA requirements for all environmental data collection activities, and defines the roles and responsibilities of all members within the OECEJ structure, that directly or indirectly are involved with environmental data collection activities.

The OECEJ QMP describes an integrated system of responsibilities for implementing QA requirements. This system includes all OECEJ staff, OECEJ management, the OECEJ Quality Assurance Coordinator (OECEJ QAC), POs, the OECEJ Quality Assurance Manager (OECEJ QAM), the Regional Quality Assurance Manager (RQAM), and the Analytical Services and Quality Assurance Branch Quality Assurance Team (QAT), see Attachment A for a list of QA officials. The roles and responsibilities of each element of this integrated system are defined here in Section 2.

### 2.1 Data Quality Objectives

DQOs are statements of the quality of environmental data required to support office decisions or actions. DQOs establish the level of risk or uncertainty that the office is willing to accept in the environmental data to be used to make a defensible decision.

DQOs represent a major planning step, accomplished through a formally structured process, whereby it is determined which environmental data are required to accomplish the objectives of sampling/analysis, what data quality is required, and what is the appropriate balance between time, resources and data quality. Simply stated, DQOs set forth the whole reason why sampling or analysis is occurring. Once the QAPP states these clearly, the other major elements of a QAPP follow much more easily than if DQOs are not clear. Clearly stated, DQOs enable the whole team involved in writing, reviewing and implementing the QAPP to effectively conduct their respective roles in development and implementation of the QAPP.

### 2.2 Quality Assurance Project Plans

QAPPs shall be written to insure that:

- The level of data quality needed will be determined and stated before the data collection begins; and
- All environmental data generated and processed will reflect the quality and integrity established by the project DQOs.

A QAPP documents the data quality objectives or "acceptance criteria" for a project, identifies the critical measurements to be performed, and discusses the QA activities to be conducted during the sampling, analytical and validation phases of the project. All QAPPs will adhere to the most recent version of the Agency's Requirements for Quality Assurance Project Plans (EPA Requirements for Quality Assurance Project Plans, EPA QA/R-5) and any relevant Regional

QAPP Guidance. Effective management of a data collection program and/or project requires periodic assessment of the quality of data being obtained to establish a basis for determining when and if corrective action is needed. To insure that this assessment occurs, all environmental monitoring planned or conducted by OECEJ shall have an associated QAPP reviewed by the PO, or other qualified entity, and, as appropriate, the OECEJ QAC.

QAPPs for continuing environmental or project-specific grants are submitted by grantees directly to the PO for review. The PO reviews the QAPP to ensure that the appropriate goals and objectives are identified in the DQOs for each grant. The enforcement data the regional programs is input into the ICIS data system, the OECEJ data specialist is responsible for all QA related to that process. OECEJ compliance and enforcement program will use generic or site-specific QAPPs for their environmental data collection activities.

Regardless of who reviews the continuing environmental or project-specific QAPPs, the POs are ultimately responsible for their approval, and for maintaining the appropriate QA documentation in the project/grant files. Signed copies of the approved QAPPs are stored on the [OECEJ SharePoint Site](#).

### 2.3 Secondary Data Quality Assurance

All secondary data provided to the OECEJ and used in projects is required to have quality assurance documentation prior to its use in projects. Metadata, the descriptors or qualifiers that document the quality assurance path of data accompany OECEJ funded projects as much as possible. OECEJ managers, staff and/or extramural agreement holders analyze and document these descriptors to ensure data usability. In those cases where the pedigree of the data cannot be determined, a disclaimer is included to clearly indicate that the data was used without these descriptors. Guidance on the collection and evaluation of secondary data can be found from the following sources:

- Uniform Federal Policy for Quality Assurance Project Plans: Evaluating Assessing and Documenting Environmental Data Collection and Use Programs. EPA Publication Number EPA-505-B-04-900A, March 2005
- Guidance for Quality Assurance Project Plans, EPA QA/G-5, December 2002
- [Handbook for Developing Quality Assurance Project Plans](#)
- US EPA Region 2 Guidance for the Development of Quality Assurance Project Plans for Environmental Monitoring Projects, April 12, 2004

### 2.4 Standard Operating Procedures

Standard Operating Procedures (SOPs) are documented methods for performing certain routine or repetitive tasks. OECEJ is involved with environmental data collection. Activities include (but are not limited to): sample setup and collection, sample handling and custody, site setup, site assessments, instrument calibrations, preventive and corrective maintenance, quality control and data management. SOPs are expressed in terms of fixed protocols which must be followed, with the flexibility to adjust to new situations by documenting the deviation. SOPs should outline modifications to published methods, as appropriate, for the application or facilities at hand. The

EPA Guidance for Preparing Standard Operating Procedures (SOPs) (EPA QA/G-6) shall be used to determine the appropriate format for individual SOPs. In addition, various SOPs exist throughout the office related to sampling, and data entry and are required to be updated every other year. Appendix B lists the current active OECEJ SOPs.

## 2.5 Roles and Responsibilities

Everyone within the OECEJ has responsibility for insuring data quality with environmental data collection activities. This will include, but not limited to, POs, supervisors, program managers and senior managers. In addition, the Office of Analytical Services and Quality Assurance (OASQA) plays a supporting role for insuring data quality related to sample results.

### 2.5.1 OECEJ's Director

The Director of the OECEJ has overall responsibility for the OECEJ QA program. This includes the development, implementation and continued operation of all QA activities. Specifically the Director of the OECEJ has the following responsibilities:

- Ensuring that all intermural and extramural projects involving the generation of environmental data are performed in accordance with the OECEJ QMP.
- Cooperating with QA reviews or audits.
- Taking appropriate corrective actions based on recommendations contained in review finding's reports.

### 2.5.2 OECEJ's Deputy Director

The Deputy Director of the OECEJ has programmatic responsibility for the OECEJ's QA program. This includes assisting the OECEJ Director in the development, implementation and continued operation of all QA activities. Specifically the Deputy Director of the OECEJ has the following responsibilities:

- Ensuring that all intermural and extramural projects involving the generation of environmental data are performed in accordance with the OECEJ QMP.
- Ensuring that resources needed to implement QA requirements are identified and provided.
- Ensuring that adequate procedures are in place to address QA requirements in all applicable program operations, including those delegated to state agencies.
- Cooperating with QA reviews or audits.

### 2.5.3 OECEJ's Quality Assurance Manager (QAM)

The QAM is delegated the responsibility by the OECEJ Director for the oversight of the OECEJ Quality System. The QAM is responsible for providing expert assistance to staff on QA/QC policies, requirements and applicable procedures and ensuring that the implementation of QA requirements by the OECEJ. Furthermore, QAM will provide support to the QAC on the

determination of the staff's training needs. Provides assistance with completion of QA Review Forms.

#### 2.5.4 OECEJ's Quality Assurance Coordinator (QAC)

The QAC is delegated the responsibility by the OECEJ Director for ensuring that the implementation of QA requirements by the OECEJ is in accordance with this QMP and the Regional QMP. The QAC reports to the QAM and works closely with the OECEJ's POs, the RQAM, the RQAO and the OASQA QAT. Specifically the QAC has the following responsibilities:

- Serving as the official OECEJ contact for QA and QC matters.
- Coordinating all OECEJ QA matters with the RQAM to insure that all QA policies and methods are in accordance with current EPA national and regional guidelines.
- Identifying OECEJ QA and QC needs, and respond to OECEJ QA and QC problems or questions with the assistance of the RQAM, and the OASQA QAT.
- Assessing OECEJ training needs, and arranging and developing training courses where appropriate, in coordination with the RQAM.
- Serving as the official OECEJ representative on the Regional Quality Council.
- Coordinating staff interviews and file reviews with the RQAM during QA assessments of the OECEJ.
- Tracking the number of OECEJ projects in progress and projects involving environmental data operations with their respective title, preparer and date of QAPPs received, reviewed and approved.
- Providing quarterly reports on the OECEJ projects to RQAM.
- Review and approve QAPPs.
- Facilitating the preparation and/or revision of the OECEJ QMP.
- Helping with the OECEJ QMP implementation.
- Conducting QA briefings for OECEJ Director and staff.
- Reviews and signs QA Review Forms.
- Consolidates OECEJ QA information for the QA Annual Report ad Work Plan and delivers it to the RQAM.

#### 2.5.5 OECEJ's Field Investigation Team Leader (FITL)

The FITL is delegated the responsibility by the OECEJ Director for ensuring QA during field investigations. Specifically the FITL has the following responsibilities:

- Maintenance and calibration of field equipment and instruments.
- Keep the QAM and OECEJ Deputy apprised of field equipment and supply needs
- Liaison between OECEJ and other EPA divisions (CID, LCD, WPD, etc.) for field investigations
- Technical review of QAPPs/SAPs for Field Investigations involving support to criminal investigations or unusual situations.

### 2.5.6 OECEJ's Project Officers (POs)

The POs have the primary responsibility for insuring that environmental data generated for projects which they administer or oversee is collected in accordance with the procedures established in this QMP. OECEJ POs include all individuals responsible for direct environmental data generation (i.e., the program itself collects samples for analysis) as well as individuals who generate environmental data indirectly through the administration of permits or orders or who administer projects supported by EPA through contracts, grants or interagency agreements (IAGs). OECEJ POs fulfill this responsibility in cooperation with the OECEJ QAC and other Division staff, as appropriate. Specific responsibilities of the POs depend on the nature of the data collection activity and on the specific program for which data is being collected. All POs will insure that each data collection activity conducted or funded by the OECEJ and administered or overseen by the PO is done only after a QAPP is reviewed and approved by the QAC and/or QAM.

QAPPs can exist in two basic forms: (1) a project-specific QAPP prepared for a particular data collection activity, or (2) a program QAPP (e.g., RAV, ICIS Data management) modified, as needed, by the user for a specific data collection project, and reviewed and verified every 3 years.

OECEJ Environmental Justice grant program (i.e., EJ Small grants) do not typically collect environmental data. On the occasion that a grant would collect data, the PO would require the grantee to submit a QAPP or have the grantee use of a generic QAPP. The QAPP is reviewed for completeness by the PO and QAC. The grant PO may also perform a technical review of the QAPP in addition to the other responsible reviewers. Regardless of who reviews the QAPP for a particular grant of direct data collection activity, the PO has the responsibility for requesting that an appropriate and timely review be done and ultimately submitted for their approval. The PO is also responsible for ensuring that original copies of the QMP, QAPP and QMP/QAPP approval documentation, and technical documents (e.g., work plans, technical reports, audit reports, monitoring plans and reports) are contained in the grant or project files.

POs will also provide assistance with completion of QA Review Forms.

### 2.5.7 OECEJ Staff

The OECEJ Staff is responsible for ensuring data quality related to any data collected, or input from all programs into ICIS, RAV and any database.

### 2.5.8 Regional Quality Assurance Manager

The RQAM is responsible for overseeing the implementation of the RQMP. Specifically, these responsibilities include:

- Reviewing and approving the OECEJ's QMP.
- Distributing Agency QA guidance documents, policies, and procedures.

- Conducting formal reviews and assessments of QA activities within the OECEJ in cooperation with the Regional Quality Council (RQC) and the OASQA QAT. The results of these reviews and assessments are provided to the Office in the form of a report.
- Provide assistance to OECEJ in the management of the QMP.
- Assessing Regional QA training needs and arranging, developing and/or presenting training courses on QA topics. The assessment of OECEJ training needs, and the arrangement and development of training courses will be done, where appropriate, in coordination with the OECEJ QAC, and the QAM.

#### 2.5.9 OASQA Quality Assurance Team

The OASQA QAT is located within Environmental Assessment and Innovation Division, and its functions consist exclusively of QA. Specifically, their responsibilities include:

- Providing assistance to the OECEJ on QA and QC issues.
- Assisting the RQAM in conducting internal assessments of the OECEJ's QA program.
- Provides assistance in QAPP review, training, and data validation.

## 2.6 Communications

As stated in the Region 3 QMP, the OECEJ QMP must not only be complete, circulated and updated to be effectively implemented, but understood by those responsible for its implementation. The OECEJ's QMP will be posted on the OECEJ SharePoint site.

The OECEJ QAC will keep the Director, Deputy Director of the OECEJ and QAM apprised of QA issues as they arise. The OECEJ's QAC will be responsible for attending meetings of the RQC and communicating the results of those meetings to OECEJ management and Staff.

## 3.0 Personal Qualifications and Training

All OECEJ personnel involved with environmentally related data-gathering activities are required to have the appropriate QA training and follow the EPA Order 3500.1. OECEJ manager and staff who may supervise or be directly involved in these activities will be offered basic training in QA concepts to assist them with the proper implementation of their responsibilities. OECEJ QAC with the support of QAM will determine the training needs of the staff according to SOP-OECEJ-2016-001-00. Moreover, their educational background, professional experience, and in some instances, on-the-job training may be necessary. The OECEJ QA training program will rely on the EPA's Quality System website (<http://www2.epa.gov/quality>). External training can be requested to RQAM and the RQC when necessary. Documentation of training must be recorded after its completion. This record is maintained in the OECEJ's SharePoint.

QA training courses specific to field activities are available through EPA's NETI Training Institute website. Training needs will be identified by the QAC, the RQAM, and the RQC; and the resultant training will be targeted to the particular needs of OECEJ staff. Currently available training programs

will be utilized or specific training will be requested from the RQAM. Training courses listed in the training section of the RQMP will be offered to all POs and QA personnel.

## **4.0 Procurement of Items and Services**

Environmental data used in OECEJ may be obtained in several ways. OECEJ may use EPA staff, grantees (including states), contractors, and private sector resources to sample and analyze environmental conditions. OECEJ will ensure that all equipment and supplies procured for Field Investigations (e.g. sampling containers, PPE) is certified to be contaminant-free and meets all EPA requirements for safeguarding data quality. OECEJ will follow the requirements outlined in Section E.2 of the Region 3 QMP and Office-specific SOPs.

## **5.0 Documentation and Records**

### **5.1 Quality-related Documents and Records**

OECEJ generates and maintains a variety of documents and records related to documenting the quality of environmental data. The following is a list of documents or records that are generated as a result of the tools described in Section 2:

- Quality Management Plans
- Quality Assurance Project Plans
- Standard Operating Procedures
- Sampling and Analysis Plans/Field Sampling Plans
- Inspection Reports
- BEN Evaluation
- Conclusion Case Data Sheet Form

### **5.2 Handling and Retention Processes**

All quality-related documents and records are managed by POs in accordance with Regional QMP and SOP-OECEJ-2016-002-00. Management include but is not limited to transmittal, distribution, retention, access, preservation (including protection from damage, loss, and deterioration), traceability, retrieval, removal of obsolete documents, and disposition. The PO is also responsible for ensuring that records and documents accurately reflect completed work.

Documents such as Work Plans, QAPPs and other project related reports are submitted to the PO. All POs shall maintain a current file of each QAPP (and related documentation) under their management until such time as the QAPP may be sent to a central file room or archived according to Agency guidelines. Documents for data submissions are grouped into two (2) categories. The first category consists of ongoing projects, where data are submitted on a periodic basis throughout the length of the project. The second category consists of fixed projects, i.e., those projects where data are submitted only once at the end of the project. Copies of national guidance or requirements documents that are specific to the programs administered

by the OECEJ will be maintained by the QAC or by the POs within the OECEJ that are responsible for the administration of that program. When new guidance and requirements documents are received, obsolete or superseded guidance and requirements documents will be removed from all users' possession. For enforcement personnel involving evidentiary records, appropriate chain of custody and confidentiality procedures are implemented, following EPA QA Field Activities Procedure, EPA Classification No.: CIO 2105-P-02.0 CIO Approval Date: 09/23/2014.

All documentation generated using CBI, must be handled according to the CBI Guidance Manual of each program.

## **6.0 Computer Hardware and Software**

OECEJ works with regional data enforcement related information collected throughout the enforcement process. This data is entered into several national data systems including ICIS. The regional enforcement programs are required to have QMPs and QAPPs associated with the collection of this data. OECA and Research Triangle Park North Carolina (RTPNC) is responsible for the maintenance and operation of ICIS, as well as maintaining data quality within the system. A QA/QC guidance is provided to the regions as part of those responsibilities under the Enforcement & Compliance Reporting Process Guidance. Enforcement data is pulled quarterly by OECEJ's ICIS data manager and checked for errors or missing information. The data manager resolves any discrepancies with a telephone call to the programs, Cincinnati Finance Center, and the Department of Justice.

EJSCREEN and RAV are OECA's database systems that have QMPs and QAPPs associated with the collection of this data. The OECEJ follows the OECA national guidance for use and management of the systems, see Appendix B.

## **7.0 Planning**

### **7.1 Program Specific Planning**

OECEJ negotiates annual targeted and indicator performance measures with both the Office of Enforcement and Compliance Assistance (OECA) and the Federal Facilities Enforcement Office (FFEO). These performance measures are based upon the annual program guidance developed by OECA and FFEO, and are captured and tracked in the Annual Commitment System (ACS) database. OECA's national program guidance in turn is based on EPA's five-year Strategic Plan's Goals. By performing the targeted and indicator measures, OECEJ contributes to the stated goals of OECA and FFEO. In addition, OECEJ may prepare "strategic plans" for submission to the Regional Administrator that details how the Office will contribute to various Regional initiatives.

A QAPP (generic or project-specific) is required for each method of environmental data collection. QAPPs are also required for Environmental Justice Grants that would collect data.

### 7.1.1 Inspections

Annually, OECEJ performs two types of inspections: single media and multi-media.

#### *7.1.1.1 Single Media*

OECEJ gives support to divisions by performing single media inspections to facilities or sites. These inspections are performed at facilities selected by the divisions based upon their respective targeting criteria. Programs in which OECEJ perform inspections include Clean Water Act (CWA) - Pre-treatment and Publicly-Owned Treatment Works (POTW), Emergency Planning Community Right-to-Know Act (EPCRA) – Section 313, Resource Conservation and Recovery Act (RCRA) Subtitles C and I, and Toxic Substance Control Act (TSCA) – Section 6 PCBs.

#### *7.1.1.2 Multi-Media*

OECEJ performs an annual targeting based on regional or National priorities, and initiatives. Multi-media inspections cover all environmental media, see SOP-OECEJ-2016-004-00.

### 7.1.2 Field Investigation

OECEJ carry out field investigations to gather information and data through different methods, following SOP-OECEJ-2016-003-00. These methods include but are not limited to sampling and field measurements.

#### *7.1.2.1 Sampling*

OECEJ gives support to divisions by performing sampling during the following circumstances: inspections, investigations, criminal investigations, cases, and support to programs. Sampling is performed to soil, water, tanks, containers, ponds, effluents or wherever required. These samplings are performed within the time frame required by the program and during hours that are appropriate for the support (i.e. criminal investigations may require sampling at night or on weekends).

These sampling events are performed at facilities that the divisions identify based upon their targeting or enforcement case development. Programs in which OECEJ perform sampling include CWA, RCRA Subtitle C, and TSCA.

#### *7.1.2.2 Field Measurements*

OECEJ takes field measurements to perform and/or support undergoing investigations and inspections. OECEJ owns several equipment such as X-Ray Fluorescence (XRF) device, Forward Looking Infrared (FLIR) camera, multi-parameter water probes, and water samplers. The gathered data may confirm or suggest leaks, presence of contaminants and high concentration of chemicals.

### *7.1.2.3 Other Information Gathering*

OECEJ also gather information in the field that is not being obtained by measuring or sampling. This information may be collected by conducting field experiments (e.g. dye in pipes), file reviews and interviewing. This information may be useful for several reasons including the identification of leaks, chemical presence, falsification of reporting data, illegal discharges.

### 7.1.3 Enforcement

Evidence of non-compliance from the inspections will determine if an enforcement action will be executed against the facility assessed. For single-media inspections, the Division that requested support for inspection is responsible of the enforcement process. In contrast, OECEJ is responsible of the enforcement process for the multi-media inspections. Depending on the type of the violation, the enforcement action could be an administrative, civil or criminal case.

## 7.2 Data Quality Planning

The OECEJ is committed to sound science, and therefore strives to generate environmental data that are of adequate quality to support decisions. The primary vehicle for insuring adequate data quality at the project level is the QAPP. QA is a necessary component of any project plan involving the collection or use of environmental data.

Developing DQOs is a fundamental part of this planning process and the completion of the QAPP. The Quality Assurance Division guidance document *Guidance on Systemic Planning Using the Data Quality Objectives Process*, (EPA QA/G-4) will be used where appropriate to establish the desired data certainty requirements based on the decision(s) to be made.

For planning purposes, all units within the Office currently rely on the OASQA for requisite QA expertise. Typically, advice and assistance may be requested on reviewing project-specific QMPs and QAPPs and to provide training for POs and managers.

For existing data, QA procedures from the original collection or generation are verified prior to use.

## **8.0 Implementation of Work Processes**

SOP are developed and approved in accordance with SOP-OECEJ-2016-005-00.

### 8.1 Procedures for Insuring Work Performed According to the Plan

All programs within OECEJ that directly collect environmental data or that require data to be collected by others must prepare a QAPP to be followed in the data collection process. All work must be performed in accordance with the approved QAPP. If there are deviations encountered during implementation of the project, then they must be documented, describing the deviation

process OECEJ follows. These plans are contained within the project/grant files and are available for review. In OECEJ, these plans may be reviewed by the OASQA or other qualified entity prior to OECEJ approval.

For the Environmental Justice small grant program administered by OECEJ, a QAPP is required as a condition for approval of any grant involving environmental data collection. Currently, the review and approval of grantee QAPP's is done by the PO's. When required, the QAC, QAM or QA staff in Fort Meade will perform technical review of the QAPPs which technical review if needed by QAC, or OQAC, or QA staff in Fort Meade.

## 8.2 Changes to the Plan

Revisions to an approved project-specific QAPP may be required for a variety of reasons, and at a minimum every 3-5 years. Other reasons for revision may include the fact that the QAPP expires, key individuals involved in the sampling and analysis change, protocols change, or DQOs change.

## 8.3 Responsibility

The OECEJ is committed to an empowered staff and is fortunate to have many senior POs. These POs are responsible for the management of their assigned projects, including the implementation of the necessary QA procedures. OECEJ management expects that all data used within its programs have been generated under the umbrella of an adequate QA protocol. Throughout a given project, the POs are expected to brief management of the progress and/or results of their work, including evidence and certification that the work was completed in accordance with an approved work plan.

For enforcement cases, the Office of Regional Counsel (ORC) may check to insure that proper QA procedures were followed before proceeding to use the data in an enforcement action.

OECEJ grant POs are responsible for insuring that QMPs are submitted by grantees who are engaged in data collection activities for approval by EPA in accordance with the guidance - [Quality Assurance Requirements, Grants and Cooperative Agreements](#)

## 9.0 Assessment and Response

OECEJ assesses the effectiveness of its quality system by internal management and technical reviews. OECEJ will review the quality system annually to address any problem aroused, add new SOPs, or as per the QA team seem to be deem appropriate.

When appropriate, OECEJ will use established accreditation programs for an assessment of its laboratory and field activities. In such way, it is ensured the identification, recommendation and implementation of corrective actions for solving any data quality problems.

## 10.0 Quality Improvement

### 10.1 Regional Quality System Audit (QSA)

QSAs are the independent assessment of the OECEJ's quality management system, and are performed by a review team under the direction of the RQAM. This review team consists of the RQAM, a member of the Regional Quality Assurance Council, the OASQA QAT and other personnel as specified by the RQAM. OECEJ is committed to using the results of this assessment process to correct any identified deficiencies and address any operational adjustments necessary for the improvement of environmental data collection, analytical procedures and the Quality Management Plan (QMP) itself.

The OECEJ fully supports the use of the QSA process to determine if its quality system is operating in an acceptable manner, as described in this QMP. The Regional QSA is planned and performed on a frequency determined during annual planning by the RQAM and the RQC. The QSA process is designed to:

- identify and examine the critical linkages among the processes and the participants in data collection and use which are necessary to assure that the quality of the data meets established requirements, and
- identify where the quality system is working well and where improvements should be considered by management.

The principal results of the QSA process are findings, which include areas that need improvement to be in compliance with the QMP or with Agency QA policy. The OECEJ response to the findings report will document the Office's plan for correction of the identified deficiency.

The review team will present its findings and recommendations in a report to the OECEJ Director. Within 30 days of report issuance, OECEJ will respond in writing to the review team's report. The OECEJ response will address the assessment findings and recommendations and will establish a schedule for implementation of any corrective measures and improvement actions of its data quality and the quality management systems.

The QAC will be responsible for developing and overseeing any corrective action plan developed as a result of a QSA. Copies of audit reports and corrective action plans will be maintained by the QAC.

## 11.0 References

U.S. Environmental Protection Agency, 2008. *Region 3 Quality Management Plan*.  
<https://www.epa.gov/sites/production/files/2015-09/documents/quality-management-plan-region-3-september-2015.pdf>

U.S. Environmental Protection Agency, 2001. *EPA Requirements for QA Project Plans (QA/R-5)*, EPA/240/B-01/003, Office of Environmental Information.

U.S. Environmental Protection Agency, 2001. *EPA Requirements for Quality Management Plans (QA/R-2)*; EPA/240/B-01/002; Office of Environmental Information.

[EPA QA Field Activities Procedure, EPA Classification No.: CIO 2105-P-02.0 CIO Approval Date: 09/23/2014](#)

[U.S. Environmental Protection Agency. \*Guidance for Quality Assurance Project Plans\*. EPA QA/G-5. Washington, DC.: U.S. Environmental Protection Agency, 2003.](#)

## Appendix

### Appendix A: OECEJ Organizational Chart



Figure 1 Region III Office of Enforcement, Compliance & Environmental Justice Organizational Chart

## Appendix B: OECEJ Index of SOPs and Policies

### Field Inspection/Sampling

- [RCRA Appendix A - Sampling Procedures](#)
- [RCRA Appendix B - Drums/Containers Sampling Procedures](#)
- [RCRA Appendix C - Ground Water Sampling Procedures](#)
- [RCRA Appendix D - Soil Sampling Procedures](#)
- [RCRA Appendix E - Tank Sampling Procedures](#)
- US EPA Region 3 Analytical Request Form (R3 ARF 2.0) Instructions Effective Date: 12/09/2015
- [ESC Sample Submission Procedures Jan2014](#)
- [US EPA Region 3 Analytical Request \(ARF\) 2.0](#)
- [EPA Requirements for Quality Assurance Project Plans EPA QA/R-5 Guidance](#)
- [Protocol for Conducting Environmental Compliance Audits for Municipal Facilities under US EPA's Wastewater Regulations \(12/1/00\).](#)
- [Protocol for Conducting Environmental Compliance Audits under the Emergency Planning and Community Right-to-Know Act and CERCLA Section 103 \(3/1/01\)](#)
- [Protocol for Conducting Environmental Compliance Audits under the Federal Insecticide, Fungicide, and Rodenticide Act \(FIFRA\) \(9/1/00\)](#)
- [Protocol for Conducting Environmental Compliance, Audits of Facilities Regulated under Subtitle D of RCRA \(3/1/00\)](#)
- [Protocol for Conducting Environmental Compliance, Audits of Storage Tanks under the Resource Conservation and Recovery Act \(3/1/00\)](#)
- [Protocol for Conducting Environmental Compliance, Audits of Treatment, Storage and Disposal Facilities under the Resource Conservation and Recovery Act \(12/1/98\)](#)
- [Protocol for Conducting Environmental Compliance, Audits of Hazardous Waste Generators under the Resource Conservation and Recovery Act \(10/1/98\)](#)
- [Environmental Audit Program Design Guidelines for Federal Agencies \(EPA 300-B-96-011\) \(4/30/97\)](#)
- [National Enforcement Training Institute](#)
- [SOP-OECEJ-2016-001-00 Training SOP](#)
- [SOP-OECEJ-2016-002-00 Records Management SOP](#)
- [SOP-OECEJ-2016-003-00 Field Investigations SOP](#)
- SOP-OECEJ-2016-004-00 Targeting SOP
- SOP-OECEJ-2016-005-00 Work Processes SOP

## Enforcement Data Management

- [Enforcement & Compliance Reporting Process for FY 2016](#)
- [Guide for Reporting on OECA National Enforcement Initiatives \(NEIs\) for FY 2016](#)
- [Quality Assurance Management in OECA Intranet](#)
- U.S. EPA Office of Chief Financial Officer Procedure 3 , Accounts Receivable Administrative Civil and Judicial Penalties (Policy Number 2540-3 , June 21 2010
- Region 3 ORC Reconciliation with Finance and QA/QC Process for ICIS Mid-Year and EOY Reporting, June 11, 2007
- [OCFO's Technical Guidance: FY 2016-2017 National Program Manager Guidance and Annual Commitment Process](#)
- [Slides for EJSCREEN Enforcement Webinar](#) (June 15, 2015)

## Environmental Justice Small Grants Program

- [OECEJ Intranet Environmental Justice Page](#)
- [OECA Environmental Justice Grants](#)
- [Grants & Technical Assistance](#)