

BROWNFIELDS PROGRAM
QUALITY ASSURANCE PROGRAM PLAN



Waste Programs Division
Remedial Projects Section

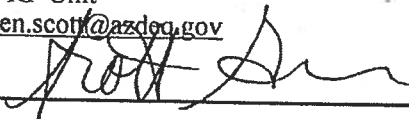
Date: January 2020
Revision B

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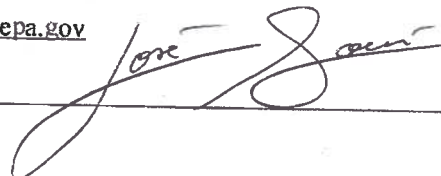
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January 28, 2020

MEMORANDUM

SUBJECT: Revised Quality Assurance Program Plan, Arizona Department of Environmental Quality, Brownfields Program (EPA QA Office Document Control Number [DCN] BNFD0985SV2)

FROM: Derrick Williamson, Environmental Protection Specialist
Quality Assurance Branch, LSS-3 *Derrick Williamson*

THROUGH: Audrey L. Johnson, Manager
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TO: Jose Garcia, Project Manager
Brownfields and Site Assessment, SFD-6-1

A revised Quality Assurance Program Plan (QAPP) and Response to Comments (RTC) memorandum for the Arizona Department of Environmental Quality (ADEQ) Brownfields Program prepared by ADEQ and received November 20, 2019, has been reviewed by the Quality Assurance Branch. The review was based on information provided in "EPA Requirements for Quality Assurance Project Plans" (EPA QA/R-5, March 2001).

The subject document is approved by the QA Branch. The RTC has been attached for reference. If you have any questions or need any further information, please feel free to contact me at 415-972-3698.

ADEQ_BrownfieldsProgram_QAPP_RTC.doc

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ACRONYMS AND ABBREVIATIONS

AAC	Arizona Administrative Code
ABP	Arizona Brownfields Program
ADEQ	Arizona Department of Environmental Quality
ADHS	Arizona Department of Health Services
ADQ	Audit of Data Quality
ARS	Arizona Revised Statutes
ASTM	American Society for Testing and Materials
CBI	Confidential Business Information
CERCLA	Comprehensive Environmental Response, Cleanup and Liability Act
CFR	Code of Federal Regulations
CSM	Conceptual Site Model
CWA	Clean Water Act
DQA	Data Quality Assessment
DQI	Data Quality Indicator
DQO	Data Quality Objective
EDD	Electronic data deliverable
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
HASP	Health and Safety Plan
IDW	Investigative Derived Waste
IRIS	Integrated Risk Information System
LCS	Laboratory Control Sample
MDL	Method Detection Limit
MQO	Measurement Quality Objective
MS/MSD	Matrix Spike and Matrix Spike Duplicate
MSR	Management System Review
MI	Multi-increment

MPC	Measurement Performance Criteria
NIST	National Institute of Standards and Testing
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
PARCCS	Precision, Accuracy, Representativeness, Completeness, Comparability, and Sensitivity
PE	Performance Evaluation
PID	Photo Ionization Detector
PRQL	Project Required Quantitation Limit
QA	Quality Assurance
QAPjP	Quality Assurance Project Plan
QAPrP	Quality Assurance Program Plan
QA/QC	Quality Assurance and Quality Control
QC	Quality Control
QCSR	Quality Control Summary Report
QMP	Quality Management Plan
RCRA	Resource Conservation and Recovery Act
RFP	Request For Proposal
SAP	Sampling and Analysis Plan
SDWA	Safe Drinking Water Act
SOP	Standard Operating Procedure
TSA	Technical System Audit
USC	United States Code
VOC	Volatile Organic Compound
VRP	Voluntary Remediation Program

DISTRIBUTION LIST

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GROUP A: PROGRAM MANAGEMENT

Introduction

The Arizona Department of Environmental Quality's (ADEQ) Quality Management System (QMS) requires that all environmental monitoring and measurement efforts mandated or supported by EPA have in place a centrally managed Quality Assurance (QA) Program Plan. ADEQ's QMS has been implemented to satisfy the policy and program requirements of the United States Environmental Protection Agency (EPA) Order CIO 2105.0 as a non-EPA organization performing work in behalf of EPA through extramural agreements.

ADEQ provides this QA Program Plan for guidance on how quality assurance (QA) and quality control (QC) procedures are applied to produce data that are:

- Scientifically valid;
- Of documented quality; and
- Legally defensible.

This Quality Assurance (QA) Program Plan describes the data quality process for the Arizona Brownfields Program (ABP), under the Comprehensive Environmental Response, Cleanup and Liability Act (CERCLA), 128a. This program has the primary goal of protecting human health and the environment, while assisting in the assessment, cleanup and redevelopment of Brownfields. This directly aligns with ADEQ's mission to protect and enhance public health and the environment. The ABP provides a process for streamlining government oversight of cleanups and redevelopment of environmentally challenged properties.

The ABP provides environmental assessment and cleanup funding to eligible applicants who are involved in real property transactions or property reuse considerations at sites with potential environmental impacts from previous site operations. The sites specifically undergoing redevelopment or reuse through the ABP constitute a small subset of property transactions, and the services provided by this program and these transactions must be consistent within the realm of well-established real estate practices. It is the purpose of the ABP to help applicants who have redevelopment or reuse projects that will provide benefits for the larger community, either through improving economic or quality of life conditions. The ABP helps these applicants navigate the established real estate process, especially when the transaction is complicated by perceived or suspected contamination on the property.

Environmental contamination can complicate property transactions or reuse considerations because liability and responsibility for cleanup must be assessed and understood by all parties prior to the successful completion of any financial deal. The financial responsibility for a costly cleanup can be assessed on a number of different parties, including financial institutions. Because of this responsibility, many privately negotiated agreements will be entered into cautiously, and financing for development of environmentally compromised property can be difficult to obtain. Depending on market forces, the concerns regarding environmental conditions of a site may be handled with very little involvement by governmental entities, with redevelopment or reuse being accomplished solely based on the value of the property and the project being considered. Where these beneficial market factors are not present, the ABP is available to help assist the property transaction.

The ADEQ, as the primary regulatory agency governing environmental issues, has very little direct involvement in the initial stages of property transaction. It is not until an environmental issue is confirmed and concentrations of contaminants are determined to exceed established

regulatory levels that the ADEQ becomes involved. The State of Arizona does not prescribe specific requirements for performing environmental assessments, except in the case of a known release of a reportable quantity of a regulated substance. Rather, the initial decision-making processes associated with real estate transactions at sites with suspected contamination are governed by the understanding of State and Federal liability structures. The property owner, prospective purchaser and lending institution need to understand these liabilities.

A4: Program Organization and Planning Documentation

The ABP operates within the Waste Programs Division of the Arizona Department of Environmental Quality (ADEQ). This Division functions as a consolidated source of environmental cleanup in the State of Arizona, with authorities and responsibilities arising from delegated authorities through the Resource Conservation and Recovery Act (RCRA), the Clean Water Act (CWA), and from cooperative work agreements through CERCLA. The ABP, as defined, is a small component of the Waste Programs Division and consists of a single full-time employee along with a supervisor of pollution prevention and recycling programs within the Sustainability Unit.

The ADEQ Director has delegated day-to-day responsibility for overseeing the Quality Management Plan to ADEQ's Quality Assurance Manager (QAM). The QAM functions as the Agency technical QA expert. The QAM has developed a team of QA Specialists made up of designated QA/QC personnel from each of the three environmental Divisions and the QAM, who resides in the Office of Environmental Excellence for reasons of autonomy. The QA Team began biweekly meetings in August 2018.

The QAM is not routinely involved with the day-to-day activities of the ABP or in any of the planning phases of a project or is involved in the review/approval of SAPs. The QAM though, can be requested to assist in the review of data when necessary. Please see Section A4.1.2 under QAM for a full description of the QAM's role.

A4.1 Program/Task Organization

The ABP, as described in the next chapter (A5: Problem Definition and Background), performs site assessments and cleanups on behalf of applying eligible entities statewide. The operation of this program involves a number of parties with specific responsibilities related to data quality; these individuals represent five different organizational entities with specific functions related to the management of Brownfields. The following paragraphs discuss these organizations and their general responsibilities, followed by discussions of specific responsibilities held by various individuals within those organizations.

Table 1 identifies all parties of the Quality System for the Arizona Brownfields Program. Entities are identified based on their applicable data roles: data quality management, data generators or data users. The defined ABP includes the ADEQ Waste Programs Remedial Projects Section Supervisor, Federal Projects Unit Supervisor, Brownfields Programs Coordinator, and the Brownfields QA Specialist. The prospective data users include the program applicant, local governments and non-profits; depending on the project, these three identified units may be synonymous, or they may represent distinct stakeholders, each with specific and different data needs. Program applicants may include local government entities and non-profits.

Under the ABP, grant applications are submitted for review by the Program Coordinator. The ABP Program Coordinator generally co-reviews and approves applications in concurrence with

the EPA Project Officer. The Program Coordinator drafts a Task Assignment (i.e. recommended Scope of Work) for sending out to bid. The ADEQ Contracts and Procurement Section requests bids from one or more project contractors. A project contractor is selected from one of the received bids. An alternative for local governments is for them to hire contractors and manage the project. In these circumstances, the local government would coordinate with ABP to review contractor submittals.

A majority of the ABP projects involve an asbestos or lead survey and abatement, but can include either a Phase I or Phase II site assessment. Site redevelopment is the goal after assessment and any necessary remediation is completed.

Table 1. List of key positions and their role regarding the QAPP

Position	Reports to	Function	Employee(s)	Role/responsibility
Remedial Projects Value Stream Manager	Director of Waste Programs	Brownfields Program Oversight	See Org Chart- Tina Le Page	Responsible for staff level participation in all the administrative and technical areas of the ABP. Although the Unit Manager is responsible for final approval of SAPs, Task Assignments and Final Assessment Reports, is available for consult on these documents. Is available for consultation regarding applications.
Quality Assurance Manager	Director of ADEQ	Quality Assurance Oversight	Paula Panzino	Responsible for implementing and maintaining the ADEQ's Quality Management System. Conducts internal and external Management System Reviews, and provides Quality Assurance assistance needed by the ADEQ Value Streams (Sections)
Brownfields QA Specialist	Remedial Projects Value Stream Manager	QA Specialist, Technical support	Debi Goodwin	Updates and ensures that the appropriate program personnel have and understand the most current approved version of the Brownfields QAPP. Assist in the development of DQOs. Review and comment on the submitted SAPs with regards to QAPrP requirements, project goals and DQO's. Provide data review and comments to ABP Program Coordinator.

Position	Reports to	Function	Employee(s)	Role/responsibility
VRP Unit Manager	Remedial Projects Value Stream Manager	Manager of Brownfields Program Coordinator	Scott Green	Gives final approval of SAPs, Task Assignments and Final Assessment Reports. The UM can request the assistance of the VSM Manager and/or QA Specialist during the review process of these documents. Is responsible for reviewing and approving project summaries for the EPA Region 9 Project Officer.
Brownfields Program Coordinator	VRP Unit Manager	Program/Project Manager for ABP	See Org Chart - Travis Barnum	All environmental investigations and cleanups undertaken in the State of Arizona under this QAPP are overseen by the Program Coordinator. The Program Coordinator also acts as the case/project manager for the ABP. The Program Coordinator is responsible for reviewing the SAP, cleanup plans and final project reports to ensure that investigations and cleanups are conducted in accordance with the environmental authorities contained in state statutes and rules. The ABP Program Coordinator will be the primary data user and decision maker with authorities to determine whether the investigative or cleanup actions taken by the project contractor at the direction of the ABP satisfies environmental regulations.

A4.1.1 Organizational Roles and Responsibilities

Environmental Protection Agency (EPA)

The federal government, through the EPA, operates the national Brownfields Program, which serves as the guiding model for the ABP. Additionally, the EPA is the source of funding for the Program through the Section 128a – State Response Program Enhancement mechanism (42 USC Sec. 9628), as established by the National Brownfields Act. Because the EPA maintains the program model and provides the program funding, its roles and responsibilities are to ensure that the ADEQ is conforming to appropriate program guidelines and meeting various terms and conditions attached to the grant funding. The Terms and Conditions statement attached to the funding dictates various aspects of the ABP including the eligibility of projects for funding and the generation of data in accordance with federally established QA/QC guidelines. As laid out in other sections of this QA Program Plan, the EPA has a role in both program-level (establishment and documentation of appropriate data quality structures) and project-level (determination of project eligibility and involvement in data collection planning) QA procedures.

Arizona Department of Environmental Quality

The ADEQ is responsible for the operation of the ABP. All programmatic activities reside in the Waste Programs Division of ADEQ. The ABP is part of the Voluntary Remediation Unit in the Remedial Projects Section of the Waste Programs Division. The Voluntary Remediation Unit consists of a supervisor and five staff-level full-time employees, of which one is responsible for the full implementation of the ABP.

Environmental Laboratory Services

Projects under the ABP are required to use analytical laboratories licensed by the Arizona Department of Health Services (ADHS). The data produced from the analysis of environmental samples are used to make informed decisions relating to the health and welfare of Arizona's citizens. These data must be of known quality, technically sound and legally defensible.

Upon application for an environmental laboratory license, ADHS shall issue the license if, after investigation, ADHS determines that the application conforms by the standards established by ADHS.

The ADHS Director shall prescribe rules providing for minimum standards of proficiency, methodology, quality assurance, operation, and safety for environmental laboratories and may prescribe standards for personnel education, training, and experience to meet Federal environmental statutes or regulation. The ADHS Director may also allow reciprocity with other states, and prescribe the manner and form in which compliance testing results are reported. The rules shall be developed in cooperation with the Director of the Department of Environmental Quality and shall be consistent with Title 49 (Section 49-101 et seq.).

Unless exempted by A.R.S. § 36-495.02, no person may operate or maintain an environmental laboratory in Arizona without a license issued by the ADHS pursuant to A.R.S. §§ 36-495.03 through 36-495.14.

Project Contractors for the Arizona Brownfields Program

Data generation is accomplished by the ABP through the services of contracted project contractors (environmental consulting firms). Project contractors are selected through a formal request for proposal (RFP) bidding process. These firms are retained for the statewide performance of all environmental assessment and cleanup activities under the ABP. The ABP coordinates vendor selection through ADEQ's Procurement Section. These companies become responsible for all data generation activities in support of the ABP, through field measurements and the subcontracting of analytical laboratory services. The direct contractual relationship between these companies and the ADEQ makes them an integral component of the ABP, and they must operate to meet all data quality requirements as established in this QA Program Plan to ensure the sufficiency of submitted information. The selected firms also operate under their own corporate-or office-level QA plans that may be considered as a component in the overall structure of QA for the ABP. The QA plans of firms are generally for liability issues and best business practices. The firms must adhere to the ABP QA Program Plan.

Eligible Applicants for the Arizona Brownfields Program

The ABP operates on behalf of its program applicants, so it is these entities that most often define project scopes and project goals. Eligible entities, who for the most part are a municipal or county government, apply to the ABP for services at a site to meet an established goal, such as the satisfaction of all-appropriate inquiry regulations and clean-up. It is these defined goals and the needs of the applicants as the primary data user that drive the types and levels of data generation undertaken at a Brownfields project. For this reason, the program applicants play a critical role in

the scoping and planning of projects prior to data generation. They have an additional interest in ensuring that the final product delivered by the ABP satisfies their expectations of project goals. The ABP Program Coordinator reviews applications and determines if the site is eligible, not eligible, or of uncertain eligibility. The Program Coordinator consults with the EPA Project Officer to ask for concurrence on most projects with few exceptions. Most eligible applicants are accepted into the Program, but the ABP prioritizes projects based on likelihood to succeed, community need, and the ability of a project to utilize other funding sources.

A.4.1.2 Individual Roles and Responsibilities

In addition to those general responsibilities maintained by the above organizations, specific responsibilities for QA have been assigned to individuals involved in the ABP. These individuals will be referred to only as a given project title or position, since these assigned duties will be unaffected by staff changes within these positions. Individuals are listed below corresponding to the five previously listed organization structures and according to the level of direct oversight within those organizations the individuals will provide in the ABP's QA system from least to most direct involvement.

EPA Region 9, Arizona Project Officer

The EPA Arizona Project Officer is the lead federal agent in the administration of cooperative agreements between the EPA and ADEQ related to Superfund and State Response Program. However, the EPA Project Officer for Superfund projects may not be the same person managing Brownfields projects. The EPA Arizona Project Officer is the individual with the ultimate responsibility in determining whether the ABP at both a program and project level is complying with all federal program guidelines as dictated by funding Terms and Conditions. In order to facilitate the EPA Arizona Project Officer's responsibilities for program oversight under the cooperative agreements, copies of all correspondence and data reports are transmitted to their attention for inclusion in project files they maintain.

The EPA Arizona Project Officer will be consulted prior to acceptance of a site into the ABP in order to align the state program with the mandates of the federal program. Initial discussion of applicant eligibility, site eligibility and project goals are typically discussed in an informal consultation between the ABP Program Coordinator and the EPA Arizona Project Officer prior to the formal application process. Applications are submitted to the ABP to support the project. If the ABP determines the project eligible and resources are available to support it, the Program Coordinator will submit a project summary to the EPA Arizona Project Officer, which will include an Eligibility Checklist (Appendix B – State Response Grant Application). The ABP Application Form summarizes key aspects of site status that would assist in determining if a site qualifies for receiving support from the ABP under Federal law. The EPA Arizona Project Officer may require of the ABP, any and all documentation to demonstrate the eligibility of a project prior to the use of grant funds at that site.

EPA Region 9, Quality Assurance Office

Staff in the QA Office of EPA Region 9 will have direct oversight in the development and review of the ABP QA Program Plan and direct involvement in the development and review of site-specific sampling and analysis plans (SAPs).

Prior to the implementation of QA elements as outlined in this QA Program Plan, this document will be reviewed and approved by the EPA QA Office. Revisions will be made in accordance with EPA-provided comments until the QA Program Plan is finalized. Once the document is finalized, any proposed revisions to the QA Program Plan will need to be considered by the EPA

QA Office prior to inclusion in a revised document. Any substantial deviations from the prescribed performance of QA elements as outlined in the approved QA Program Plan will need to be documented and submitted as part of a Technical System Audit (TSA) prepared by the ADEQ QAM (the TSA is described in Section C of this document).

The primary responsibility for the review and approval of project-specific plans will reside with the EPA. However, ADEQ will conduct concurrent in-house reviews of the plans. This dual review will help the ADEQ align, through the comparison of plan review comments, its QA requirements with the practices used by the EPA.

Director, Arizona Department of Environmental Quality

The ADEQ Director has overall responsibility for ADEQ's QA Program as outlined in EPA Order CIO 2105.0 (formerly 5360.1 A2). More specifically, the ADEQ Director is responsible for ensuring that QA is an identifiable activity having adequate resources allocated for the accomplishment of the mission's goals for ADEQ's divisions and Southern Regional office. These goals include providing the resources for the collection of the right type, quantity, and quality of data for all in-house and external projects. The Director has delegated this duty to the Agency's QAM.

Environmental Laboratory Services

The ABP relies on the ADHS licensing program for the satisfaction of many of the QA elements associated with laboratory operation and reporting (see Appendix A of this QA Program Plan). The ADHS is used to maintain oversight on analytical labs for quality control (QC) on all environmental samples submitted for analysis under a regulatory program - either the CWA, Safe Drinking Water Act (SDWA) or RCRA. Licensed laboratory QA responsibilities are described in its QA plan, as required by A.A.C. R9-14-615.B. ADHS maintains a list of licensed laboratories and periodically inspects them to ensure compliance.

The ABP Program Coordinator is responsible for reviewing laboratory reports submitted to ADEQ to ensure all have the appropriate QC documentation. The ABP also has the option of having audits performed by ADEQ's QAM on laboratories licensed by ADHS. All ADEQ laboratory audits must be performed in accordance with Section 2.3.2 of ADEQ's August 2010 Quality Management Plan.

Director, Waste Programs Division of ADEQ

All site investigations and cleanups conducted in the State of Arizona are overseen by the ADEQ through its combined authorities from state-delegated environmental programs. The Waste Programs Division Director is responsible for the administration of all these cleanup authorities. In addition, because site cleanup regulations play an integral part in the development of data quality guidelines, the Division Director also plays an important function in determining data quality and sufficiency for the Waste Programs of ADEQ, including the ABP.

The regulations governing investigations and cleanups (ARS Title 49 – The Environment) in Arizona determine, on a general level, the type and amount of data necessary to make cleanup decisions, including the issuance of determination letters (e.g. “no further action” letters). The Division Director is responsible for ensuring a consistent application of these regulations across all Waste Programs cleanup sites. All site information is available to the Division Director for review and consideration of site decisions. The Division Director also holds regular supervisor-level meetings to discuss ADEQ issues and Waste Programs operations.

Value Stream Manager, Remedial Projects Section

The Value Stream Manager (VSM) Manager is responsible for staff level participation in all the administrative and technical areas of the Arizona Brownfields Program (ABP). Although the Unit Manager is responsible for final approval of Sampling and Analysis Plans (SAPs), Task Assignments and Final Assessment Reports, the VSM Manager is available for consult on these documents. Also, the Value Stream Manager is available for consultation regarding applications.

Unit Manager, Voluntary Remediation Unit

The Unit Manager of the Voluntary Remediation Unit is responsible for final approval of Sampling and Analysis Plans (SAPs), Task Assignments and Final Assessment Reports. The Unit Manager can request the assistance of the VS Manager and/or QA Specialist or other senior level technical division staff during the review process of these documents. The Unit Manager is responsible for reviewing and approving project summaries that are forwarded to the EPA Region 9 Project Officer.

Arizona Brownfields Program, Program Coordinator

All environmental investigations and cleanups undertaken in the State of Arizona are overseen by the Program Coordinator. The Program Coordinator also acts as the case/project manager for the ABP. The Program Coordinator is responsible for reviewing the SAP, cleanup plans and final project reports to ensure that investigations and cleanups are conducted in accordance with the environmental authorities contained in state statutes and rules. The ABP Program Coordinator is the first person to comment on submitted SAP's, Task Assignments and Final Assessment Reports. The ABP Program Coordinator creates an approval or comment letter and submits to the Unit Manager for Final Approval. Technical Support, if needed, is available to the ABP Program Coordinator for review assistance prior to submittal to the Unit Manager for Final Approval.

The ABP Program Coordinator will be the primary data user and decision maker with authorities to determine whether the investigative or cleanup actions taken by the project contractor at the direction of the ABP satisfies environmental regulations. The ABP Program Coordinator will be responsible for drafting and providing Project Summaries to the Unit Manager for approval prior to being forwarded to the EPA Region 9 Project Officer.

QAM:

ADEQ's Director has delegated authority for the QMS to the QAM. The QAM resides in the Office of Environmental Excellence, outside of the Divisions, and reports to the Director. The QAM, together with assistance of QA/QC specialists from each Value Stream implement the QMP for each of the Divisions within ADEQ. The QAM is responsible for resolving disputes related to quality issues through utilization of the Arizona Management System, which depending on the nature of the dispute, can involve escalation to the appropriate Executive Leadership Team member (Division Directors, Director, Deputy Director, and Chief Officers). Quality disputes will be discussed during the bi-weekly QMS meetings to determine if there are impacts that may affect other Divisions and or ADEQ as a whole; however, the QAM retains the authority to make the final decision.

The QAM is responsible for reviewing all internal QA documentation, including QAPrPs, QAPjP, and audit findings. The QA/QC specialist that had been overseeing generation of the QAPP may choose to address those comments, or delegate that responsibility to subject matter experts and authors within the Value Stream or Unit. Draft review by the QAM will precede all EPA document deliverables.

The QAM may provide assessment of ABP activities through the activities listed below:

- Technical System Audits
- Performance Evaluations
- Audits of Data Quality
- Data Quality Assessments

Please see Section C1.2.2 – Assessment of Program Activities for details on these activities.

The QAM also reviews and can revise the QA Program Plan. The QA Program Plan will be updated to accommodate new developments in QA/QC as necessary, or every 5 years. Revisions to the QA Program Plan may become necessary through several different routes, and the QAM or the QA/QC Specialists will be responsible for responding and making these revisions when appropriate. During regular contact with the EPA, the EPA QA Officer may make suggestions for improving quality performance that could be incorporated into the QA Program Plan. During a Technical System Audit (TSA), the QAM will examine the QA Program Plan and the performance of the ABP and may make suggestions for improved performance that result in revisions to the QA Program Plan. Likewise, a Brownfields environmental consultant may request revisions to the QA Program Plan in response to changes in industry-wide field methodology or for the addition of new or innovative technologies. Development and acceptance of new analytical methods may provide lower detection limits or other improvements that can be described in revisions to the QA Program Plan.

The QAM is not routinely involved with the day-to-day activities of the ABP and does not routinely participate in any of the planning phases of a project or is involved in the review/approval of SAPs. The QAM, though, can be requested to assist in the review of data when necessary.

QA/QC Specialist

The QA/QC specialist provides the bridge between the QAM and the value stream and unit programs. The QA/QC specialists from each VS meet with the QAM every other week to discuss activities associated with the rollout of ADEQ's Quality Management System, which currently includes the following activities:

- Oversight of QAPP generation, and amendment,
- Oversight of uniform presentation of SOPs,
- Implementation of QMS Training,
- Planning, scheduling and implementation of the QMS audit program, and
- Generation of standard work for all the QMS processes list above.

ADEQ's QMS program is under development. The current intent is for QA/QC specialists to take on the role of auditors for Value Streams other than their own. This will enable the QA/QC specialists to avoid potential conflicts within their current Value Streams and Units and continue with their original working positions. QA/QC specialists are required to have at least one performance goal related to the work they are performing for ADEQ's QMS. Although the QA/QC specialists will continue to report directly to their Value Stream or Unit Managers, the QAM may be given the opportunity to provide the relevant manager with feedback related to their performance as a QA/QC specialist.

ABP, Technical Support

The daily administration of the ABP is handled by the ABP Program Coordinator. However, the Program Coordinator, Unit Manager or Section Manager may request technical support for a specific project's activities involved with data quality for site cleanup. The Technical Support person's responsibility will be to ensure data submitted to the program by its environmental consultants meet appropriate levels of quality. Technical Support staff include the QA Specialist and the WPD Principal Engineer. This is done through three major activities:

1. Review of SAPs: The Technical Support person will be available to assist the Project Coordinator when necessary. The Technical Support person, upon request from the Program Coordinator, Unit Manager or Section Manager, will review and comment on the submitted SAPs with regards to QAPrP requirements, project goals and DQO's.
2. Development of Data Quality Objectives (DQOs)—prior to the preparation of SAPs by the Brownfields contractor, an initial scoping session may be held with all available stakeholders to outline project goals and DQOs. These initial meetings will roughly follow guidance for the standard DQO process developed by the EPA (EPA 2006 - Guidance on Systematic Planning using the Data Quality Objectives Planning Process). The results of these initial meetings will guide the development of the site-specific SAP and will be documented as part of the SAP preparation. The development of DQOs will be a collaborative process and may include the EPA Region 9, site applicant, appropriate local authorities and the selected site contractor.
3. Review of Data Reports—the Technical Support person will be available to assist the Program Coordinator when necessary. The Technical Support staff, upon request from the Program Coordinator, Unit Manager or Section Manager, will review the submitted data reports generated under an approved SAP with regards to QAPrP requirements, project goals and DQO's.

When requested by the Program Coordinator, Unit Manager or Section Manager, the ABP Technical Support staff will prepare comments for revision of the data reports and give comment. The Program Coordinator, who also acts as the case/project manager, has the responsibility of approving all reports prior to finalization and delivery to the program applicant for their use.

Statewide Brownfields Environmental Consultants, Project Leads

The ABP selects environmental consultants to provide services to the program on a project-by-project basis. The ABP Task Assignment is drawn up so that the selected consultants can bid on the project. The ABP will review the bid(s) and either accepts or rejects it. Once a bid is accepted then a kick-off meeting is held to clarify questions, agree to schedules and establish expectations.

As primary data generators, the environmental consultants are responsible for the implementation and documentation of a number of QC elements, such as collection and analysis of field blanks, field duplicates and rinsate samples, to satisfy the requirements of the QA Program Plan. Please note that Section B.5 of this QA Program Plan discusses Quality Control in detail.

Beyond the elements contained in the ABP QA Program Plan, the environmental consultants will be required to prepare a site-specific SAP for review by the ABP prior to any data collection activities at a Brownfields project site.

The consulting firms may have their own internal corporate QA plans. However, all work must still satisfy the approved ABP QA Program Plan. As firms are contracted by the State for the generation of environmental data, these internal corporate QA plans should be made available for review by request of the ADEQ and EPA. All necessary QC elements will be covered in the ABP QA Program Plan and site-specific SAPs.

Program Applicants

Program applicants are the primary data users in the ABP; they may also be the primary data generators. Assessments undertaken by the ABP to be used in redevelopment decisions and site cleanups will be guided by intended property reuse. As the primary data users, the program applicant will play three roles in determining the quality of data generated by the program. First, as part of the application and initial project planning process, the applicant will provide existing site information, including information from prior sampling events. This existing information will be reviewed by ADEQ to determine the appropriateness for its use by the ABP. If the data are of sufficient quality, they may be used in the program.

Secondly, the program applicant will dictate their project needs by participating in and providing input during all planning efforts. These project needs will determine the amount and type of data to be generated by the environmental consultants. Planning helps ensure that data of adequate quality and quantity are collected.

Thirdly, the program applicant will have the opportunity to review and provide comments on the completed data reports as an essential component in determining if the data of sufficient quantity and quality have been collected to meet project needs. Reviewing data in light of the project DQOs will help determine if the objectives have been met.

A4.2 Planning Documentation

Although all activities undertaken by the ABP will be unique one-time events associated with a site assessment or site cleanup project, those activities will occur within a framework that is well-defined by specific documentation requirements. Most activities will be conducted along a coordinated flow path consisting of the submittal and review of documents. Therefore, each defined document will play a role in establishing QC elements to ensure the production of a usable, reliable final product. Outlined below are the defined documents and deliverables that will constitute a typical Brownfields assessment or cleanup project; these are listed in the order that those documents will be produced during a project. Although the documents required for drafting and transmittal after the SAP are not considered planning documents, they will still be outlined here. A final section will be devoted to the documentation and use of previously generated data, as well as the documentation of projects that deviate from the established process. Later chapters will discuss other documentation issues, particularly the development of audits.

1. Application to the ABP

A project to be undertaken by the ABP will be initiated by the submittal of a completed application by the party to be designated the Program Applicant. Application must be made in full on the form approved by the ADEQ (Appendix B). In most instances the Program Applicant will

be an “eligible entity” as defined in Section 104(k) of CERCLA, meaning that the applicant will be a unit of local government or non-profit sanctioned by the State. Applications are accepted by the ABP at any time during the year.

Nearly all applications are completed by a Program Applicant with the assistance of a member of the ABP staff. This tends to occur because of the connection that is made between potential applicants and ABP staff during Program outreach and marketing efforts. The primary purpose of the application is to help the EPA Region 9 Arizona Project Officer and ABP Program Coordinator determine whether a project meets site and applicant eligibility requirements.

In order to receive funding through the ABP, the application must demonstrate that the site meets the definition of a Brownfield, as established by the federal program in CERCLA Section 101(39). The site must not be on the National Priority List (NPL) or be the subject of on-going enforcement actions by the State or Federal government. The applicant must not be responsible for the contamination present at the site. These eligibility requirements are dictated by Section 128a grant funding Terms & Conditions. It is at this stage in the process that it is determined whether or not the ABP will be able to fully fund a project and the applicant is informed of the level of assistance that they will likely be able to receive from the ABP. This allows the applicant to seek and include other resources available and to indicate the role of those resources in the ABP application. In turn, the existence of additional resources helps demonstrate the likelihood of the success of a proposed project.

EPA grant funding has been such that Phase I Environmental Site Assessments (ESAs) and Phase II ESAs are usually fully fundable; however, funding for clean-ups have been much less attainable at the typical funding levels provided by EPA. The application is also intended to help the ADEQ rank sites for funding. Priority will be placed for funding of projects with well-defined project goals or re-use strategies. Projects with defined end-uses are more likely to achieve completion within the ABP because project goals and data needs are more easily determined. Other ranking criteria are roughly modeled on those used in the federal competitive grants. At this time in the ABP, though, ranking is not necessary and the projects are handled on a first come, first serve basis, depending on funding availability.

Along with the completed application form, the program applicant is also requested to submit any previously generated data available for the site. The use of previously generated data will be covered in other sections of this QA Program Plan (e.g. Section B9: Non-direct Measurements). In general terms, these data are used to help define project goals and data needs. The submittal of previously generated data reports is voluntary, and an application can be found to be sufficient based solely on responses to the questions contained on the approved form.

2. ABP Review of Application

In response to an application, the ADEQ will begin the application review process (described in the following paragraph). The review process will determine whether to fund or deny the proposed project. In declining to undertake a project, the ADEQ will provide communication to the applicant with an explanation for the denial. A denied application will be kept on file, but no further action will be taken. Approval of an application and acceptance into the ABP will, however, generate correspondence from the Program Coordinator to the applicant that serves several purposes, as described in the following paragraphs.

The Program Coordinator receives and performs the first review of an application. If the Program Coordinator deems the proposed project eligible and believes the project meets other ABP criteria as described above, the Program Coordinator will perform a verbal screening, via telecom or in-house meeting, with the applicant. The Program Coordinator provides a project summary, including an Eligibility Checklist (Appendix B – State Response Grant Application), to the EPA Region 9 Arizona Project Officer with a recommendation that the ABP support the proposed project. The Arizona Project Officer may request additional information or documentation from the Program Coordinator in review of the application and concur with the request to support the project or deny support. If support is denied, the Program Coordinator will communicate this to the applicant with an explanation as to why the ABP is denying support. If the Arizona Project Officer agrees to support an application, then the Program Coordinator communicates this message to the applicant, usually by e-mail.

3. Site-Specific Scope of Work

After a project is accepted and enrolled into the ABP, the Program Coordinator develops a scope of work proposal and not-to-exceed budget for the approved project. Through ADEQ's Procurement Section a Consultant is requested to provide the submittal. The proposed scope of work and budget are reviewed for completeness and appropriateness by the Program Coordinator and Program Supervisor; either may ask that the proposal be modified if they believe the tasks identified or budgets are not appropriate.

4. Scope of Work Approval Memo

Once the scope of work and budgets are satisfactory to the ABP, the Program Coordinator or the Unit Manager will write an approval memo to ADEQ's Contracts and Procurement Section, who accepts the Consultant's proposal. A contract brings all parties to an understanding of the work to be performed and the cost of that work. This contract also provides authorization for the Contractor to begin work on the project under the terms of the Statewide Contract. Scheduling of the work is then largely left between the Program Applicant and Consultant to best meet their needs, unless some programmatic issues dictate that ABP timeframes and deadlines be met. In those cases, the Program Coordinator will also be involved in setting project timelines and/or benchmarks.

The ABP will try to assist the applicant through all phases of environmental work necessary on the approved project site to make it ready for redevelopment. There is no additional application required of the Program Applicant; however, approval for further assessment must be approved by EPA. When an additional phase of work is required on a project site, the Consultant that performed the previous phase is requested to submit another scope of work and budget proposal for the next phase and the same review process is repeated. The limiting factor is the amount of funding the ABP has available and any programmatic limits placed on funding of a site by CERCLA and the grant's terms and conditions.

5. Sampling and Analysis Plan

The primary planning document for data generation activities will be prepared by the Brownfields environmental consultant after initial project scoping meetings established and directed by the ABP Program Coordinator. The specific type of document submitted and the information required to be presented will be dependent on the type of project being undertaken. Acceptable planning documents include a SAP.

The SAP drafted by the consultant must be in the form of the approved templates developed by the EPA Region 9 and adapted for use in the ABP. These templates are provided in Appendix C of this QA Program Plan. Most of the information necessary for inclusion in the SAP will be discussed during the initial scoping meetings, and it will be the responsibility of the consultants to accurately record and apply these discussions in the planning documents. Where appropriate, consultants may also make reference in these planning documents to information already contained in the QA Program Plan.

The Brownfields environmental consultant submits planning documents to the ABP for review. The ABP reviews and approves the submittals, and then submits them to EPA Region 9 for review and approval. No assessment or cleanup activities involving data generation will be undertaken until EPA Region 9 approves all planning documents. Primary responsibility for review of assessment planning documents will reside with the ABP Program Coordinator.

6. Planning Documentation Approval

After review of the document, the ADEQ will take one of three actions through written correspondence to the environmental consultant. These actions are:

1. If the SAP is found to be fully satisfactory, the Program Coordinator will draft an approval letter, the Unit Manager will give Final Approval and the Program Coordinator will then notify the consultant allowing them to proceed with the work.
2. Where there are minor deficiencies, the Program Coordinator will draft a conditional approval letter, which will provide conditional approval while dictating corrections in the plan, without requiring re-drafting of the documentation. The Unit Manager will give Final Approval to letter. These corrections will be considered part of the approved plan.
3. Where there are major deficiencies, the Program Coordinator will draft a comment letter, indicating the plan deficiencies and suggesting corrections for re-drafting of the plan. The Unit Manager will issue Final Approval to the comment letter. Technical Support will be available at all stages of the process for consult. Figure A2 details the review process for a SAP.

7. Field Documentation

Though largely discussed elsewhere in this document, certain levels of field documentation will be required to be produced and maintained by the environmental consultant to help demonstrate compliance with approved methods and to assist reviewers to make QA conclusions. Examples of field documentation that will be a required element, as dictated by this QA Program Plan (Group B: Data Generation and Acquisition) or by an approved SAP, would include field logs, monitoring well sampling logs and chain-of-custody forms for environmental samples. Field documentation will be included as part of the package to be submitted for independent data validation, along with the analytical laboratory data package for projects. Field documentation will later be submitted as part of the assessment or cleanup report in a hard copy format.

8. Laboratory Analytical Package

The data package produced by the analytical laboratory should be sufficiently detailed to allow for review of analytical methods through data verification and validation processes and to determine appropriateness of data quality. The requirements for the specific content of laboratory data packages will be discussed in other sections of this QA Program Plan. The laboratory

analytical package will later be submitted as part of the final assessment or cleanup report in a condensed form in a hard copy format.

9. Draft Assessment and Cleanup Reports

All site information generated during the assessment or cleanup must be collected, tabulated and considered in a final report generated by the environmental consultant to document the project. Before the report is finalized, a draft version must be submitted to the ABP Coordinator and the program applicant to allow for comments and consideration of the quality and format of presented data.

The format of the assessment or cleanup report will depend on the project goals established during initial scoping sessions. For Phase I and Phase II ESAs, the format of the report will largely be dictated by the American Society for Testing and Materials (ASTM) standards for those documents. For site characterization and site cleanup project reports, there is no definitive guidance for Brownfields projects reporting formats. Other ADEQ programs, though, have standard reporting requirements that are outlined in the Arizona Administrative Code. The program that best fits the Brownfields project will serve as a guide for reporting.

The ABP operates through a contract with different environmental consultants, each of whom may have their own standards or preference for report formats; consequently, the final report will largely be presented in a manner dictated by the individual consultant. However, general requirements for the final report would be the documentation of all work/field activities, presentation of all environmental data in a tabular and/or spatial format, and a section where the consultant uses their professional judgment to draw conclusions from the site data in the context of project goals. Through review of the draft reports, the ABP Program Coordinator will evaluate the acceptability of the presentation.

Supporting documentation relevant to data generation and data quality must be attached to the final report, either in a hard-copy or electronic format. Generally, all field documentation will need to be attached to the report in a hard-copy format. The laboratory data package should be attached in an electronic format, with the exception of the request for analysis forms and the actual laboratory analytical sheets, which should be included in hard-copy format.

10. Report Comment Letter

If the ABP Program Coordinator requires revisions to the draft report, those revisions will be communicated to the consultant through the drafting of a comment letter. The comment letter will include both suggested and required revisions. It will be the responsibility of the ABP Program to determine whether the conclusions made by the consultant in the report are supported by the data and whether the data are of sufficient quality and quantity to meet project objectives.

Where project objectives are not met, the ABP Program Coordinator may recommend that additional data be collected to fulfill any data gaps before the final report is issued. Otherwise, the consultant may make the appropriate revisions as outlined in comment letters submitted by the ADEQ for the submittal of a final deliverable. In those instances where the draft report requires no revisions, the consultant will still be directed to resubmit a final version of the report.

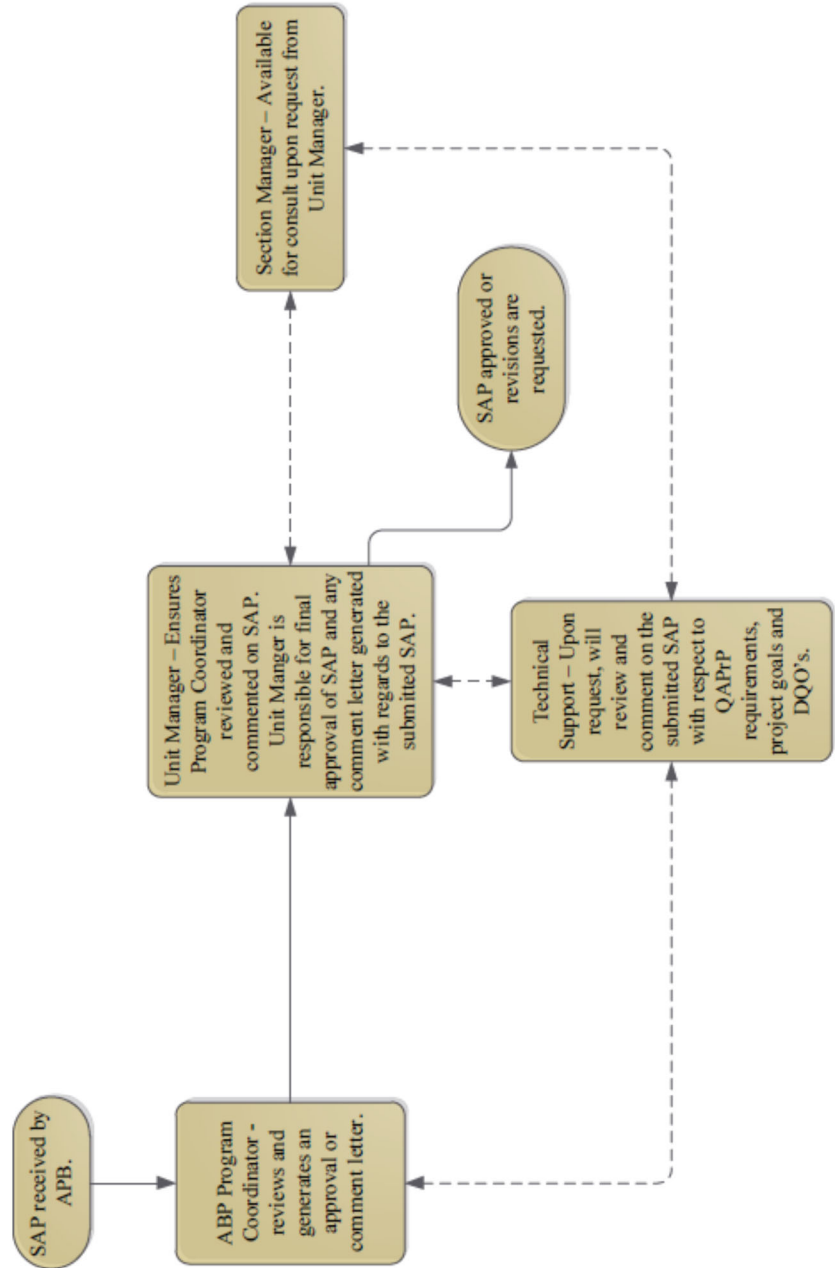
11. Final Report

Application to the ABP constitutes a request for service to produce a site assessment /characterization report or to fund a site cleanup. Therefore, the final output of a project will be the submittal of a final assessment or cleanup report to the ADEQ, the program applicant and the EPA Project Officer. Additional copies of the final report will be provided to the program applicant, as dictated by their needs.

12. Project Closeout, Project Completion Letter

Project closeout from the ABP will be granted by ADEQ upon receipt of the approved final report. Closeout will be in the form of verbal or written notification to the environmental consultant and written correspondence to the EPA Project Officer and the ABP Program Applicant. The closeout notifications will acknowledge receipt of the approved final deliverable and will request the consultant submit any outstanding invoices for project work. Under the ABP, project closeout reflects the adequacy of the final deliverable; it does not, however, indicate all remedial requirements under the Arizona Revised Statutes have been satisfied.

Figure A2: Sampling and Analysis Plan (SAP) Review Process



A5: Problem Definition/Background

Participants involved in real estate transactions rely on environmental data to make decisions to secure their interests and limit their potential for losses. Industry standards, driven by laws governing environmental liability, have been developed to help standardize this process. For the majority of sites in the State of Arizona where environmental concerns are present, the ADEQ is the lead regulatory authority for cleanup oversight; therefore, determining liability under State law is of primary importance.

For various reasons, private or other public resources may not be available to property owners or prospective purchasers to perform sufficiently detailed environmental assessments that will provide enough comfort for a transaction to proceed. Additionally, property owners may not even have the wherewithal to develop initial property information to attract purchaser or developer interest. These situations serve to limit property reuse and, by extension, property cleanup. It is the ultimate goal of the ABP to provide environmental information of sufficient quality and quantity to allow property owners and potential purchasers to proceed with property transfer and cleanup. To this end, projects must use analytical laboratories that are certified by the State of Arizona (see Appendix A).

Environmental assessments, as developed in industry standards, are roughly divided into three stages, each of which may be performed by the ABP on behalf of an applicant: (1) initial investigations, (2) site-specific sample collection and (3) remedy development/cost estimates. These correspond to the ASTM Phase I, Phase II and Phase III ESAs. Each of these stages has specific goals and objectives tied to property transactions and the local, state and federal regulations governing environmental liability. These stages of effort are roughly outlined in the following paragraphs; greater detail regarding the performance of these stages of investigations, in conformance with industry standards and program requirements, are contained in other sections of this QA Program Plan.

The first and most basic step in determining environmental conditions at a transaction site is the Phase I ESA, which had previously corresponded to “due diligence” requirements on purchasers of properties and now equates with federally adopted regulations requiring “all appropriate inquiry” to qualify for “bona-fide prospective purchaser” status under CERCLA. The purpose of a Phase I or an all-appropriate inquiry study is to describe environmental conditions at a site through an investigation of site documents, consideration of observable visual clues during site visits, and the collection of information regarding past site use. Results of a Phase I investigation are used to assess whether environmental contaminants may be present at the site at concentrations that would require a property owner to take action in accordance with environmental regulations. This conclusion is made conservatively using best professional judgment, and is based on consideration of the quality and sufficiency of existing information. A property transaction may proceed comfortably if there is no reason to believe contaminants are present; otherwise, suspected environmental contaminants need to be further investigated through the collection of site-specific environmental data.

The most reliable method of determining the presence or extent of environmental impacts on a piece of property is the generation of site-specific environmental data, through sample collection and field monitoring. Site-specific confirmation sampling and analysis are performed as part of a Phase II ESA. Guided by findings of the initial investigations, sampling and monitoring plans are developed to investigate areas of potential concern or areas where no source of reliable information could be obtained. The purpose of the Phase II ESA is to minimize uncertainty associated with “recognized environmental conditions” identified in initial investigations.

Although a Phase II ESA is primarily intended for confirming the presence or absence of contamination, the sampling can be quite extensive and may even include activities generally considered to be conducted under the third stage of site assessment.

Beyond confirmation of “recognized environmental conditions,” property owners and prospective purchasers will want to know the extent of the contamination and how this translates into cleanup or site reuse costs. The amount of sampling necessary beyond that needed to confirm site conditions is dependent on the required level of certainty to be attached to a cleanup cost estimate. These environmental efforts can come under the aegis of several related documents, including a Phase III ESA, an Engineering Evaluation/Cost Assessment, or any other type of comprehensive site investigation. The objective of this stage of assessment is to place definable boundaries on costs and timelines for cleanup, based on detailed information concerning the magnitude and extent of contamination at a piece of property. In order to accurately estimate cleanup costs, it may also be necessary to fully understand the remedial alternatives available to conduct the cleanup. For this reason, a Phase III ESA may be directly tied to the preparation of site cleanup plans.

The ABP is capable of providing any of these environmental services to eligible applicants accepted into the program. Because the goal of the ABP is to promote the cleanup and reuse of sites, this program will normally only accept sites where there is comfort that land transaction and site re-use will be a likely result of the assessment efforts. In order to provide the most incentive to accomplish this goal, the ABP will likely perform assessment services at a site, while working with the stakeholder parties to ensure that sites can be directly entered into a cleanup program and site remediation can commence.

In addition to assessment services, the ABP can also provide cleanup services on eligible properties for projects that have a significant public component, defined as active ownership of the property by a local or county government or non-profit agency either for public use or for eventual transition to private ownership as determined by the land holding agency. The ABP operates through the use of environmental consultants retained by contract to perform these services. All data generated by these private firms at the direction of the ABP staff are collected in consideration of the program applicant’s project needs. The ABP operates as an independent control on data quality as generated by its consultants. The end product of a Brownfields assessment is a document that is used by the site owner and prospective purchaser to define transaction conditions and determine site re-use options. At the completion of a Brownfields cleanup, certification and issuance of a “Project Completion” letter is the responsibility of ADEQ’s Voluntary Remediation Program (VRP).

A6: Program/Task Description

The ABP generates environmental data in support of real property transactions on behalf of program applicants. The type and quality of data are generally dictated by the needs of the applicants. Generally, the ADEQ, through the ABP, will provide contract services for performing Phase I and Phase II ESAs, which are defined by industry standards. Where applicants require greater technical assistance, the ABP may offer more comprehensive assessment services, including performing a Phase III ESA, providing accurate estimates of cleanup costs, or developing cleanup/remediation plans. In the case of an eligible applicant holding properties with potential community benefit, the ABP may fund site cleanup services and generate confirmation data at completion to demonstrate regulatory compliance with the Arizona’s environmental statutes and rules (ARS Title 49 – The Environment and AAC Title 18 – Environmental Quality).

The ABP is driven entirely by applicant needs, so data collection is not dictated by a regular schedule. Rather, as applicants enter the program, individual project goals are defined, including the types of environmental measurements, deliverables and reports that will be completed. Therefore, at the most functional level, this QA Program Plan has been developed to guide data collection associated with one-time events for the assessment and cleanup of participating sites. Site assessments under the ABP will be performed within the established framework for real estate transactions operating in the State of Arizona. To satisfy these purposes, three types of assessment services may be conducted:

- Phase I ESA—the collection and review of available information regarding a property, in satisfaction of “due diligence” or “all-appropriate inquiry” requirements, conducted prior to completion of a transaction in order to determine the presence or likely presence of environmental contaminants. These assessments shall be conducted in accordance with the ASTM E1527-05 standard.
- Phase II ESA—a focused site investigation conducted to confirm the presence or absence of environmental contaminants at a site, typically completed prior to a property transaction in order to assess environmental liability issues as part of property negotiations. These assessments will be conducted in accordance with the ASTM E1903 standard. The majority of the ABP projects are asbestos and lead surveys instead of general assessments.
- Phase III ESA, Comprehensive Site Investigation, Cleanup Cost Estimate—an industry standard has not been developed for a comprehensive site investigation to determine the full nature and extent of environmental contaminants at a site. Where an applicant requests assistance in this regard, a site-specific scoping process will be used to guide the project.

Site cleanups are conducted under the oversight of the ADEQ VRP. The VRP requires the submittal of an application and fee (which is paid from the State Response Grant). The VRP reviews all site cleanup plans and reports to determine the adequacy of the completed cleanup in the issuance of a “closure letter”.

The ABP decides when to undertake an assessment or cleanup project at the time of receipt of a completed application and in consideration of program funding. At the time of project acceptance, planning activities commence through a collaborative process involving all project stakeholders and directed by the ABP Program staff. The primary responsibility of the ABP staff is to oversee and ensure that data of adequate quality and quantity are collected to satisfy project objectives, as defined in the project-specific DQOs. To assure that analytical data are of adequate quality, state-certified laboratories must be used.

A7: Quality Objectives and Criteria for Measurement Data

This section is broken into two parts, consistent with EPA Region 9 guidance for QA Program Plans. The first section documents regulatory action levels that are specific to the ADEQ; these action levels serve as the driver for site assessments and cleanup. The second section discusses MQOs and data quality indicators (DQIs) under the ABP.

DQI's, as defined by EPA, involve precision, accuracy, representativeness, completeness, comparability, and sensitivity, also known as "PARCCS" parameters. It is expected that these indicators be used in data evaluation, but in general, the criteria by which DQIs are evaluated are based on project data quality needs, i.e., the MQOs. The extent to which program or project QC results meets MQOs determines whether data are acceptable for the intended use.

MQOs are the acceptance thresholds or goals for project data, usually based on the individual DQIs for each matrix and analyte group or analyte. MQOs are project-or method-specific quality acceptance criteria established to support project-specific DQOs, as well as the decisions that will be made based on the quality of the data. MQOs define whether the data are usable and meet project needs. Like DQOs, MQOs can be quantitative or qualitative statements.

MQOs specify what the QC acceptance criteria are for each analysis. AAC R9-14-615 (see Appendix A) details QA requirements for ADHS licensed laboratories. Regardless of how the laboratory evaluates performance, the laboratory's acceptance criteria must meet the needs of each project. This QA Program Plan provides general requirements, but individual SAPs will provide project-or site-specific requirements. Tables A1 through A3 are examples of the QC data from laboratories ADEQ typically receives.

Table A1. Typical QC data from laboratories. This is an example for water samples using EPA Method 8260B.

Compound (Laboratory Method - EPA Method 8260B)	Matrix Spike (% Recovery Limits)	Laboratory Control Sample (% Recovery Limits)	Method Blank Result (ug/l)	Surrogates (% Recovery Limits)	
	Matrix Spike Duplicate (Relative % Difference)	Laboratory Control Sample Duplicate (Relative % Difference)	Method Detection Limit (ug/l)		
Benzene	68-131	68-130	ND		
	32	20	2.0		
Carbon Tetrachloride	65-147	60-150	ND		
	35	25	5.0		
PCE	67-131	70-130	ND		
	31	20	2.0		
TCE	66-132	70-130	ND		
	29	20	2.0		
Dibromofluoromethane					70-130
Toluene					70-130
4-Bromofluorobenzene					70-130

Table A2. Typical QC data from laboratories. This is an example for soil samples using EPA Method 8310.

Compound (Laboratory Method - EPA Method 8310)	Matrix Spike (% Recovery Limits)	Laboratory Control Sample (% Recovery Limits)	Method Blank Result (mg/l)
	Matrix Spike Duplicate (Relative % Difference)	Laboratory Control Sample Duplicate (Relative % Difference)	Reporting Limit (mg/l)
Naphthalene	10-143	38-126	ND
	50	18	0.20
Benzo[a]pyrene	18-134	48-137	ND
	50	32	0.010
Chrysene	23-136	69-128	ND
	50	31	0.020
Dibenz[a,h]anthracene	21-137	73-130	ND
	49	31	0.010
Surrogate % Recovery Limits	2-Chloroanthracene 18-128	2-Chloroanthracene 62-124	2-Chloroanthracene 18 -128

Table A3. Typical QC data from laboratories. This is an example for water samples using EPA Method 8081A.

Compound (Laboratory Method 8081AZ)	Matrix Spike (% Recovery Limits)	Laboratory Control Sample (% Recovery Limits)	Method Blank Result (ug/l)
	Matrix Spike Duplicate (Relative % Difference)	Laboratory Control Sample Duplicate (Relative % Difference)	Method Detection Limit (ug/l)
4,4-DDT	10-161	61-126	ND
	20%	35%	0.007
Aldrin	10-143	43-120	ND
	20%	33%	0.009
Endrin	10-147	67-122	ND
	20%	35%	0.007
Heptachlor	10-157	51-124	ND
	20%	33%	0.008
Surrogate % Recovery Limits		Decachlorobiphen 10 -103%	
Surrogate % Recovery Limits		TCMX(S) 10-132%	

A7.1 Regulatory Action Levels

Services provided by the ABP are intended to help applicants satisfy environmental laws and regulations as established by the State of Arizona. These services are intended to help to reduce obstacles for property transfer, redevelopment or reuse that can result from these regulations. For the purposes of the ABP, the only regulations determined to be relevant in establishing site action levels come from State law sources; the ABP does not accept projects or work on sites of such significant magnitude that they may come under federal CERCLA authorities, either through placement on the NPL or through a federal enforcement action.

Objectives of specific projects will be determined through initial scoping sessions held with the participation of all involved stakeholders and following EPA's DQO process (EPA 2006 - Guidance on Systematic Planning using the Data Quality Objectives Planning Process). There are two firm areas in State law that will govern much of the project objective formulation. These two areas are (1) the release reporting regulations, which govern the initiation of a site cleanup project, and (2) the establishment of action levels specific to site media. These two topics are discussed below.

A7.1.1 ADEQ Release Reporting Regulations

The State of Arizona has adopted regulations that govern the reporting of releases of pollutants,

contaminants, petroleum products and hazardous substances. These regulations are contained in the Arizona Administrative Code (A.A.C.) Title 18. The enabling authority for these regulations is contained in several statutes adopted by the Arizona Legislature. Title 49 – The Environment of the Arizona Revised Statutes (A.R.S.) - contains provisions for the regulation of Water Quality, Air Quality, Solid Waste Management, Hazardous Waste Disposal and Underground Storage Tanks.

These enabling authorities allow Arizona to adopt reporting requirements that would be protective of state water resources and would also be consistent with federal hazardous waste requirements. The model for the State release reporting regulations comes from two federal sources: (1) reportable quantities of hazardous substance as contained in CERCLA and (2) reportable quantities of petroleum product described in RCRA Subchapter IX.

A7.1.2 Establishment of Media-Specific Action Levels

The ADEQ has authority to require owners and operators to conduct corrective/remedial actions at the site of a release. A remedial action is defined at A.R.S. § 49-281 and a corrective action is defined at A.R.S. § 49-1001. The terms are similar in that each refers to actions intended to stop, minimize and mitigate damage to the public health and the environment. Therefore, ADEQ has the authority to set action levels for soil, groundwater and surface water.

Remediation Standards for Soils

Remediation standards for soils are established in A.A.C. Title 18, Chapter 7 Article 2 (Soil Remediation Standards). ADEQ has three standards for soil: Background, Pre-determined and Site Specific. The Soil Remediation Standards rule weblink is presented in Appendix D and details how each standard is established..

Water Quality Standards for Groundwater and Surface Water

Remediation standards for groundwater and surface water are established in A.A.C. Title 18, Chapter 11 (Water Quality Standards). Water Quality Standards for surface water and aquifer water are established in Articles 1 and 4, respectively. The Water Quality Standards rule weblink is presented in Appendix E. The weblink for Water Quality Standards is Please note that for those chemicals that do not have an established Aquifer Water Quality Standard, the Narrative Aquifer Water Quality Standards (A.A.C. R18-11-405) apply.

A7.2 Measurement Quality Objectives and Data Quality Indicators

Analysis involves the characterization of samples based on chemical and/or physical properties. Analyses result in generating raw data from instrumental analysis, chemical analysis, or physical testing. The analytical methods used will be specific, sensitive enough to answer the question posed by the ABP objectives and meet the data quality goals associated with those objectives.

MQOs are the project or program QC criteria defined for various DQIs. During the planning phase, these set pre-determined limits on the acceptability of the data in regards to accuracy /bias, and precision, completeness and sensitivity.

ADEQ Project/Case Managers may consult with the ADEQ QA/QC Supervisor, or research a variety of published or written materials, to aid them in selecting or developing measurement technologies. The ADEQ QA/QC Supervisor shall maintain a file of in-house procedures and practices used in the measurement process. DQOs and ADEQ's QA/QC Supervisor's

professional knowledge, are used to identify appropriate analytical procedures.

DQI's involve precision, accuracy, representativeness, completeness, comparability, and sensitivity, also known as "PARCCS" parameters. It is expected that these indicators be used in data evaluation, but in general, the criteria by which DQIs are evaluated are based on project data quality needs, ie, the MQOs. The extent to which program or project QC results meets MQOs determines whether data are acceptable for the intended use.

Each DQI is defined to help interpret and assess specific data quality needs for each sample medium/matrix and for each associated analytical operation. The principals along with a brief summary of information related to assessing each DQI is given below:

Precision

Precision is the degree of agreement among repeated measurements of the same parameter under the same or similar conditions. Precision is reported as either relative percent difference (RPD) or relative standard deviation (RSD), depending on the end use of the data. Field precision is assessed through the collection and analysis of field duplicate samples. Laboratory precision is based upon laboratory matrix spike/matrix spike duplicate (MS/MSD) analyses.

Accuracy

Accuracy is the extent of agreement between an observed or measure value and the accepted reference, or true, value of the parameter being measured. For example, the objective for accuracy of the field sample collection procedures is to ensure that samples are not affected by sources external to the sample, such as sample contamination by ambient conditions or inadequate equipment decontamination procedures. Evaluating the results of equipment and trip blank samples for contamination is an assessment of sampling accuracy. For laboratories accuracy can be assessed by determining percent recoveries from the analysis of laboratory control samples (LCSs) or standard reference materials. The analysis of MS/MSD samples can also be utilized to determine laboratory accuracy by determining percent recoveries from the analysis of MS/MSD samples.

Representativeness

Representativeness is a qualitative term that describes the extent to which a sampling design adequately reflects the environmental conditions of the site. It also reflects the ability of the sample team to collect samples and laboratory personnel to analyze those samples in such manners that the data generated accurately and precisely reflect the conditions at the site.

Completeness

Completeness is defined as the measure of the quantity of valid data obtained from a measurement system compared to the quantity that was expected under normal conditions. While a completeness goal of 100 percent is desirable, an overall completeness goal of 90 percent may be realistically achieved under normal field sampling and laboratory analysis conditions.

Comparability

The confidence with which one data set can be compared to another is a measure of comparability. The ability to compare data sets is particularly critical when a set of data for a specific parameter is compared to historical data for determining trends. Ensuring that property specific SAPs are adhered to and that all samples are properly handled and analyzed will satisfy the comparability of field data.

Sensitivity

Sensitivity is the ability of a method or instrument to detect a parameter to be measured at a level of interest. For example, the sensitivity of the field instruments selected to measure temperature, pH, conductivity, and turbidity of groundwater should be measured by analyzing calibration check solutions, where appropriate, that equate to the lower end of the expected concentration range.

A8: Special Training/Certification

A8.1 Responsibilities

ADEQ's Value Stream and Unit Managers are responsible for ensuring that each staff member involved with collecting or analyzing environmental data has the necessary technical, quality assurance, and project management training required for his or her assigned tasks and functions. Managers are also responsible for ensuring that technical staff maintains the necessary level of proficiency to effectively meet ADEQ's QA/QC responsibilities. ADEQ's QAM will serve as the Agency resource for arranging for, and assisting in, defining QA/QC training needs on a regular basis to update Program staff with developing QA/QC issues.

A8.2 Identification of Training Needs

Core training will be coordinated through the QAM in conjunction with various Division supervisory personnel. The Section Managers shall appropriate staff members to be the Quality Assurance/ Quality Control (QA/QC) Specialists for the Waste Programs Division. This duty will remain effective until the Section Manager decides to appoint a new staff member or rotate the responsibility. The QA specialist will attend trainings indicated and scheduled by ADEQ's Quality Assurance Manager, as stated in the ADEQ Quality Management Plan.

Subject Matter Experts (SMEs) within the WPD are available to the ABP as needed.

Intermediate and advanced skill training will be arranged when the appropriate Agency staff identify the need. The QAM, in conjunction with Program management, will identify continuing professional training requirements and address those requirements utilizing external resources for the latest technological advances and evolution in industry standards.

A8.3 Implementation of Training Requirements

ADEQ staff members are encouraged by supervisors to draw upon their educational background, experience, technical training, and on-the-job training to enhance their understanding and performance of QA-related procedures.

ADEQ's training program will offer, or arrange for through a third-party vendor, the following courses on a schedule and frequency suited to meet the needs of ADEQ's staff with QA responsibilities:

- An Orientation to Quality Assurance Management
- Establishing Data Quality Objectives
- Preparing Quality Assurance Project Plans
- How to Perform a Preliminary Data Review
- Public and Confidential Records Management

In addition, they will be encouraged to attend meetings and seminars, and to take formal training, in accordance with ADEQ's training policy, to enhance their understanding of Program specific QA requirements within the Programs they work. ADEQ's QAM will maintain a record of all QA training taken by staff and managers responsible for environmental data generation.

A9: Documents and Records

A9.1 QA Program Plan Revisions

Throughout the life of the ABP, there may be changes to program requirements, or modifications to the way environmental data are collected, or changes to how enforcement activities are defined. Therefore, this QA Program Plan is recognized as a dynamic document that is subject to revision, as needed. The ABP Program, technical support and QA/QC personnel will examine and revise this QA Program Plan annually, although the plan will only be resubmitted to EPA Region 9 QA manager for review once every five years or as otherwise needed. Approved revisions will be disseminated to personnel included on the Distribution List (page 6).

A9.2 Environmental Data Documentation

This QA Program Plan and referenced policy, guidance and SOPs include written procedures for all methods and procedures related to the collection, processing, analysis, reporting and tracking of environmental data. All data generated during the course of ABP projects must be of sufficient quality to withstand challenges to their validity, accuracy and legibility. To meet this objective, data are recorded in standardized formats and in accordance with prescribed procedures. The documentation of all environmental data collection activities must meet the following minimum requirements:

- Data must be documented directly, promptly, and legibly. All reported data must be uniquely traceable to the raw data. All data reduction formulas must be documented.
- All original data records include, as appropriate, a description of the data collected, units of measurement, unique sample identification, station or location identification (if applicable), name (signature or initials) of the person collecting the data, and date of data collection.
- Any changes to the original (raw data) entry must not obscure the original entry. The reason for the change must be documented, the change must be initialed and dated by the person making the change.

Other specific documentation requirements are discussed throughout this QA Program Plan and referenced SOPs.

The QAPP for the ABP will be kept on-file at ADEQ and saved on the common computer drive (J) in the QAM folder. This document will be updated at least every five years and reviewed annually. An email will be sent out to all employees of the Brownfields Value Stream informing them of where the most current version can be found after each update is complete. Throughout the life of the ABP, there may be changes to program requirements, or modifications to the way environmental data are collected, or changes to how enforcement activities are defined.

A9.2.1 Field Documentation and Forms

Records are maintained for each field activity to ensure that samples and data are traceable and defensible. Field records will be documented on field forms or in designated field logbooks to provide a secure record of field activities, observations and measurements during sampling. Field data and observations will be recorded in real time on activity-specific data forms. Completion of appropriate field documentation and forms for each sample is the responsibility of the field personnel. Section “B5.1 – Quality Control in the Field” provides a more complete description of the types of recorded field information.

A9.2.2 Project Files

The ABP Program Coordinator is responsible for the maintenance of the project file. The project file will consist of all site documents specifically listed in Section A4.2 of this QA Program Plan. Additionally, the ABP Program Coordinator will collect and include in the project file all other relevant project documentation in the file. These additional documents may include any official correspondence that does not correspond to any of those previously listed documents. The project file will also include all information not related to data generation, including documentation of all public involvement or community notification efforts.

A9.3 Routine Records Management Quality Assurance

The ADEQ Records Management Process addresses the system employed by the Agency for handling documents. This plan outlines the roles and responsibilities for management and staff concerning chain of custody procedures and records management.

ADEQ document control procedures require that documents generated, or obtained, by Agency personnel be accounted for when a project is completed. ADEQ’s Records Management System dictates the procedures for checking-in and checking-out files for ADEQ staff, external clients, and the public.

ADEQ management will assure that the objectives of the Records Management Process are achieved. These objectives include the following:

- Prevent the creation of unnecessary records in any media;
- Promote the continuous development of filing systems and structures that allow for the efficient organization, maintenance, and retrieval of records;
- Ensure that records of continuing value are preserved, but that valueless or noncurrent information is disposed of or transferred to storage in a timely manner in accordance with ADEQ and/or ADHS records retention requirements;
- Ensure that the acquisition and use of all direct paper to microform systems and equipment, or electronic digital imaging, are technically feasible, cost-effective, and most importantly, satisfy Program needs;
- Preserve and protect information that is vital to the essential functions or mission of the organization. Preserve and protect information that is essential to the legal rights and interests of individual citizens and the government.

GROUP B: DATA GENERATION AND ACQUISITION

B1: Sampling Design/Experimental Design

Brownfields site assessments are conducted to facilitate the reuse of properties by determining if site media are contaminated. If the initial phase of the assessment finds evidence of contamination, then follow-on phases are conducted to determine characteristics of the contamination. Characterization includes evaluating the threat posed by the contamination, determining potential solutions for cleanup of the contamination, and estimating the cost of solutions necessary to prepare the site for redevelopment. This QA Program Plan documents the planning, implementation and assessment procedures for the ABP and describes how specific QA and QC activities are applied throughout the course of the site investigations.

A Brownfields site assessment routinely involves one or more of the following activities: a background investigation on the history of site use, a field investigation that includes sample collection and analysis, an evaluation of cleanup options and costs and an assessment of the usability of resulting data. Typically, the first step is to conduct an investigation of site history to identify past uses of the property, including types and amounts of chemicals that may have been used onsite and any disposal activities that may have contributed to contamination.

This QA Program Plan includes requirements for measurements collected for a typical Brownfields project (Table B1) and describes what types of activities or projects specifically require a SAP. The specific design and extent of a Brownfields site assessment will be dictated largely by the conceptual site model (CSM), the availability of resources and the required level of data quality and QC. Project-specific DQOs and sampling design should be documented in the site-specific planning documents that are developed for each Brownfields site.

The following sections describe the sampling and analysis requirements under the ABP. Site-specific information required in the SAP for each Brownfields site includes the number and location of monitoring samples, types of samples to be collected, measurement parameters, sampling frequencies, design of sampling networks for monitoring and the time period over which sampling activities are to occur. All SAPs prepared for the ABP must be reviewed and approved by the ABP Program and Quality Coordinators.

B1.1 Sampling Design

A sampling design specifies the number and location of samples to be collected at a site. Sampling design strategies are guided by study objectives and should factor in the conditions unique to the site being considered for redevelopment, including data gaps in the CSM, exposure potential, projected site reuse and available resources. As noted above, possible sampling design strategies are identified during the DQO process, and the details of the sampling design strategy are described in the site-specific SAP.

Typical designs for the collection of samples at Brownfields sites include biased sampling, statistically based sampling, one-time events and ongoing (multi-phase) events. Biased sampling specifies sampling locations based on the judgment of the field team leader and sampling plan designer. Statistically based sampling designs use random or systematic sampling locations designed to avoid bias. A single sampling event may not provide an adequate characterization of the contamination onsite, especially when the CSM contains significant data gaps. In these situations multi-phase sampling may be helpful. The need for this sort of investigation should be identified during the DQO process.

Additional information on the development of sampling strategies is available at: EPA's 1998 Quality Assurance Guidance for Conducting Brownfields Site Assessments (<https://www.epa.gov/sites/production/files/2015-06/documents/bfqag4.pdf>); EPA's 2006 Guidance on Systematic Planning Using the Data Quality Objectives Process (https://www.epa.gov/sites/production/files/documents/guidance_systematic_planning_dqo_process.pdf). and EPA's 2007 Guidance for Developing Standard Operating Procedures (<https://www.epa.gov/sites/production/files/2015-06/documents/g6-final.pdf>).

B1.1.1 Sample Types and Matrices

Sample types typically include surface soil, subsurface soil, groundwater and surface water. Some sites require sampling of sediment, pore water, sludge, air (soil gas or vapors) and other non-routine matrices such as building materials. Samples may be collected as discrete (grab) or composite samples. Discrete samples are useful for identifying and quantifying chemicals in areas of a site where contamination is suspected. The number of discrete samples should be determined during the DQO process. Composite samples are useful for identifying the average concentrations of contaminants across a site. Composite samples are composed of more than one discrete sample collected from different locations; the samples are mixed into a single homogeneous sample and submitted to the analytical laboratory as a single sample. Multi-increment (MI) samples represent a specific type of composite sample (see Incremental Sampling Methodology, ITRC February 2012 <http://itrcweb.org/ism-1/>). The number of composite samples and the number of individual samples within a composite sample should be based on the goals established during the DQO process.

Background samples should be collected from the same media as site samples, from areas on or near the site that are unlikely to be contaminated by site-related chemicals. Background samples are analyzed for the same parameters as the site samples to establish background concentrations of chemicals. Typically, background data are collected for naturally occurring inorganic chemicals, such as metals, whereas the background concentrations of manmade organic chemicals are assumed to be zero. It is the responsibility of the applicant to demonstrate if there is an "anthropogenic background" for organic chemicals that is unrelated to site activities.

B1.1.2 Sampling Locations and Frequencies

The sampling locations and the schedule for sampling are also specified during the DQO planning process. The duration over which samples are collected and the frequency of sampling or whether the work will be done in phases is also determined during the DQO process.

B1.1.3 Parameters of Interest

The measurements to be collected at a site depend on the characteristics and history of the site. This QA Program Plan provides QA/QC information for parameters and media typically analyzed for Brownfields sites. Unusual parameters and matrices will necessitate preparation of a site-specific SAP. This topic is discussed in more detail in Section B2 of this QA Program Plan.

B1.1.4 Sampling Event Planning

Advance planning for field sampling events is required to ensure that the necessary arrangements are in place and that equipment is ready. The following will be considered when planning the sampling event:

- 1) Sample Handling and Custody Procedures— Field personnel will make arrangements with the appropriate laboratory for proper sample containers and custody procedures (described further in Section B3).
- 2) Equipment— Prior to collection of any sample, field personnel will ensure that all sampling equipment has been properly assembled, decontaminated, calibrated and is functioning properly prior to use. Equipment will be used according to manufacturer's instructions, and should generally be decontaminated according to the EPA SOP- Sampling Equipment Decontamination (see Appendix F for EPA weblink to SOPs).
- 3) Field Forms— Field personnel will need to ensure that all necessary field forms, such as field log books, soil and groundwater sampling forms and boring logs are assembled prior to the sampling event. Such field forms will be developed individually for each site based on the site's specific needs, by the ABP contractor.
- 4) Health and Safety— Field personnel will ensure that all site-specific health and safety procedures are considered, and that personal protective equipment (PPE) is gathered.
- 5) Investigation-Derived Waste— Field personnel will plan for the generation of investigation-derived waste (IDW), and should assemble the appropriate IDW containers prior to the sampling event. See Appendix G for weblink to substantive policy.
- 6) Field Audits— Field personnel will plan to conduct periodic field system audits for ongoing sampling events.
- 7) Paperwork and Permits— Field personnel will also ensure prior to the sampling event that other applicable paperwork is in order, such as permits and access agreements.

B2: Sampling Methods

Site-specific sampling methods as well as the numbers and types of samples are specified during the DQO process and documented in the site-specific SAP. Details of sample collection methods will depend upon site conditions, equipment limitations, chemicals of concern, sample matrices and cost, and will be described in a site-specific SAP. Collection methods will follow an ADEQ or EPA approved sampling protocol, unless unforeseen circumstances do not allow for an approved collection method. The following sections present general information on sampling methods for various media, including surface water, groundwater, drinking water, soil, sediment, pore water, sludge, air and non-routine matrices, such as building materials.

Additional methods may be used with approval of the ABP Program or Quality Coordinator. General guidelines for field sampling are included in the EPA Standard Operating Procedure (SOP) on General Field Sampling Guidelines. EPA SOPs for field sampling methods are available for download at <https://www.epa.gov/quality/field-sampling-procedures-region-9>

B2.1 Soil Samples

Soil samples collected at Brownfields sites may include surface and subsurface samples. Sample types may be discrete or composite samples. There are a variety of acceptable methods for collection of soil samples, and selection of an appropriate method will depend on site conditions and the sampling design. Methods commonly used to collect soil samples include drilling soil borings, digging test pits, sampling via hand auger and digging with a shovel or trowel. Additional information on the collection of soil samples can be found in EPA SOPs for soil sampling (see Appendix F for EPA weblink to SOPs).

B2.2 Groundwater Samples

Samples of groundwater may be collected during Brownfields site assessments and cleanups. Collection of groundwater samples may be one-time, ongoing and periodic, or may continue as part of the post-development obligations. Groundwater samples can be collected from soil borings, temporary well points, monitoring wells and existing wells (e.g., municipal or community supply wells, domestic water wells, irrigation wells, or industrial supply wells). Groundwater samples may also be collected from shallow, intermediate, deep and perched aquifers.

No monitoring wells are to be installed during a Brownfields site assessment unless prior approval is given by the EPA project manager.

Groundwater samples collected using soil borings allow for the collection of one-time discrete groundwater samples at a specific depth interval at a point in time. One-time groundwater samples are often used to help select locations for future monitoring wells. These one-time samples may be collected using a direct-push method, which is described in the SOP for direct-push groundwater sampling (see Appendix F for weblink to EPA SOPs).

Groundwater samples may be collected from permanently installed monitoring wells. Existing monitoring wells should be properly installed according to state regulations (see A.R.S. Title 45, Chapter 2, Article 10), and developed according to an Arizona Department of Water Resources (ADWR), ADEQ or EPA-approved protocol. Non-standard wells or problems encountered during well sampling should be noted in the field logbook and in subsequent reports. Collection of groundwater samples from monitoring wells is described in the EPA SOPs for groundwater well sampling, monitoring well installation and monitoring well development (see Appendix F for EPA weblink to SOPs).

The following procedures should be employed when sampling residential water supplies or water-supply wells of any kind:

- Obtain permission to access property and obtain samples for analysis
- Inspect the water system to locate the tap nearest to the wellhead. Samples should be collected prior to any treatment units (e.g., ultra-violet light, reverse osmosis, etc.) if possible.

- Purge the water lines to flush the plumbing and holding tanks before collecting samples from drinking water, irrigation, or industrial wells, so that the sample collected is as representative as possible. Remove any faucet aerators and reduce water flow before collecting samples.

B2.3 Surface Water Samples

Surface water sampling may be conducted during Brownfields site assessments and cleanups if the contamination of any surface water body can be directly attributed to the site, such as a body of water is fully contained within the site boundaries. Surface water samples include representative liquid samples collected from streams, brooks, rivers, lakes, ponds, lagoons, seeps, estuaries, drainage ways, sewers, channels, wetlands, surface water impoundments and other surface water bodies. These samples can also be collected from the surface or at depth within the water body. Surface water samples will be collected in general accordance with the EPA SOP for surface water sampling (see Appendix F for EPA weblink to SOPs).

B2.4 Pore Water Samples

Pore water is water contained within the upper few centimeters of sediments just below the surface water / sediment interface. This interface is known as the hyporheic zone. Sampling of this zone can be done with equipment such as seepage meters and push-point pore water samplers or lysimeters. Discharge of groundwater to surface water through the hyporheic zone is unlikely to be homogeneous; therefore, determining locations for pore water sampling can involve additional investigative steps.

B2.5 Sediment Samples

Sediment samples can be collected for analysis of biological, chemical, or physical parameters. There are many factors to consider when choosing sediment sampling equipment, including, but not limited to, site access, sample volume requirements, sediment texture, target depth for sediment collection and flowing versus standing water. In general, piston samplers are best used for soft, fine-grained sediments where sediments at depth are required. Grab/dredge samplers are best for coarse, shallow sediments and where large volumes of sediment are required. Additional information on the collection of sediment samples is provided in EPA's SOP for sediment sampling (see Appendix F for EPA weblink to SOPs).

B2.6 Sludge Samples

Sampling of sludge could involve a number of different situations and will likely depend upon site conditions. Therefore, details of collecting sludge samples will be described in a site-specific SAP. Common settings where sludge is sampled include catch basins and drywells.

B2.7 Air/Soil Vapor Samples

Air sampling is typically conducted at sites where vapor intrusion may be an exposure pathway for contaminants. Air sampling is more complex than soil or water sampling because of the reactivity of chemical compounds in the gas matrix and sample interaction with the sampling equipment and media. Air sampling equipment is selected based on a number of factors including site conditions, sampling objectives, chemicals of concern, analytical methods and cost. Methods to sample air at active facilities include (but are not limited to) soil gas sampling or sampling with

flux chambers. Typical sampling containers include Tedlar™ bags, stainless steel Summa™ canisters, gas tight syringes and glass sorbent traps used with sampling pumps. More information on air sampling and analysis can be found in EPA's SOPs list (Appendix F) and ADEQ's Soil Vapor Sampling Guidance (Appendix G)

B2.8 Building Materials Samples

Because sampling at Brownfields sites can often involve buildings slated for reuse, there is a potential for non-routine sampling of unusual sample matrices, such as building materials. These matrices include lead-based paint, asbestos-containing materials and other types of building materials. Site-specific sample collection procedures will be developed, if needed, for sampling such non-routine matrices. Sampling personnel will coordinate with the analytical laboratory on the anticipated sample collection and handling methods to ensure that the sample data will meet all QA/QC requirements. Additional information on the collection of non-routine sample matrices is in EPA's SOP for chip, wipe and sweep sampling (see Appendix F for SOP weblink).

B3: Sample Handling and Custody

Chain of custody procedures differ among laboratories. Title 9, Chapter 14, Article 6 of the Arizona Administrative Code (R9-14-615) details the necessary documentation for sample control activities at an ADHS licensed laboratory. Custody procedures of the analyzing laboratory are identified prior to field activities. Field personnel must make arrangements with the appropriate laboratory for proper sample containers, preservatives, holding times and chain of custody forms. The custody of a sample must be traceable from the time of sample collection until results are reported. Chain of custody procedures provide a mechanism for documenting information related to sample collection and handling. A chain-of-custody form must be completed after sample collection and prior to sample shipment or release. The chain-of-custody form, sample labels and field documentation must be crossed checked to verify sample identification, date and time sample was collected, type of analyses, number of containers, sample volume, preservatives and type of containers. Additional information on sample handling and custody procedures can be found in EPA's SOPs for specific sample collection methods and Section 4 of EPA's Quality Assurance Guidance for Conducting Brownfields Site Assessments (EPA 1998). SOPs and forms for sample handling, custody (chain-of-custody forms) and transport are referenced in Appendix F of this QA Program Plan.

B4: Analytical Methods

All analytical methods used to analyze samples from Brownfields site assessments must comply with relevant requirements of applicable federal or state programs for which they were collected, such as the CWA, SDWA, RCRA, Clean Air Act, or use other EPA-approved alternate methods. The most recently approved methods under the CWA and SDWA were promulgated in 40 CFR Part 136 on July 21, 2003. Currently approved methods under RCRA SW-846 can be obtained from the EPA website at <http://www.epa.gov/epaoswer/hazwaste/test/sw846.htm>. Exhibit 1 of Title 9, Chapter 14 of the Arizona Administrative Code details ADHS approved methods with corresponding analytes.

Table B1 lists the classes of analytes that are typically of the greatest interest during Brownfields site assessments, as well as the ADEQ's preferred analytical methods. This table provides a starting point for selecting analytical methods for Brownfields site assessments. Additional methods may be available and appropriate; consult with the ABP Program, Quality Coordinators, or Exhibit 1 of Title 9, Chapter 14, Article 6 (http://www.azsos.gov/public_services/Title_09/9-

[14.htm](#)) of the Arizona Administrative Code for alternate methods. The site-specific SAP should identify analytical methods and equipment, decontamination procedures, waste disposal requirements and performance requirements.

B5: Quality Control

QC requirements are integral to the success of a QA program. QC covers the overall system of technical activities that measure the performance of a process against defined standards to verify that they meet predefined requirements. Because errors can occur in the field, laboratory, or office, it is necessary for QC to be part of each of these functions. This QA Program Plan describes and defines the general quality objectives of the ABP. Site-specific SAPs provide specific QA/QC requirements, which include non-routine analytes when applicable. This approach to quality system management ensures that quality activities are conducted throughout the project, but allows for the flexibility to tailor quality-related activities to individual projects, depending on the complexity of the Brownfields site.

QA and QC parameters apply to the two primary types of data — definitive and non-definitive data — regardless of whether the data collection activity is associated with field measurements or laboratory measurements. Non-definitive data are frequently collected during the first stage of a multi-phase screening assessment, using rapid, less precise methods of analysis with less rigorous sample preparation. Non-definitive data can provide analyte identification and quantification, although both may be relatively imprecise. Typically, 10 percent of non-definitive samples or all critical samples are confirmed using analytical methods and QA/QC procedures and criteria associated with definitive data. Non-definitive data without associated confirmation data are of unknown quality. Qualitative, non-definitive data identify the presence of contaminants and classes of contaminants and can help focus the collection of definitive data, which is generally the more expensive of the two. Some data uses, such as risk assessments, require definitive data.

B5.1 Quality Control in the Field

QC parameters should be described in detail for each step of field work and should also include specific corrective actions to be taken if difficulties are encountered in the field. Evaluation of field sampling procedures requires the collection and evaluation of field QC samples. Trip blanks, rinsate blanks, field duplicates and extra volume for matrix spikes and matrix spike duplicates will be collected and submitted to the analytical laboratory to provide a means of assessing the quality of data resulting from the field sampling program. Collection frequencies for field QC samples are noted in subsequent paragraphs contained in this section of this QA Program Plan.

Field QC requirements and documentation of all field sampling and observations are critical for providing a historical record for analysis of the usability of the data produced. The official field log book will contain documentation of field activities that involve the collection and measurement of environmental data. Additional forms may be used in the field to record related activities as explained below.

SOPs delineate the step-by-step approach that field personnel must follow in collecting samples, taking field measurements, decontaminating equipment, handling IDW and calibrating instruments. Most qualified sampling contractors and State and Federally certified laboratories develop SOPs and analytical methods as part of their overall QA program. SOPs should be developed following “Guidance for Preparation of Standard Operating Procedures for Quality-Related Operations” (EPA 1995). SOPs should be included as an appendix of each project specific SAP. The project field team should document reasoning for any deviations from an SOP.

Sampling SOPs will be prepared by the group responsible for sampling and will be submitted to the ABP Program or Quality Coordinator for review and approval as part of the sampling plan.

B5.1.1 Field Instrument/Equipment Inspection and Calibration

The ABP contractors conduct the sampling which generally requires the use of different pieces of equipment and tools in the gathering of environmental data. A field preventive maintenance protocol involves ensuring that all field equipment has been properly calibrated, charged and inspected prior to and at the end of each working day and that replacement parts are available.

All field equipment needs to be inspected to determine if it is adequate and appropriate for the media, parameters and tests to be performed. Data may be generated onsite through the use of real-time equipment, such as photoionization detectors (PIDs), organic vapor analyzers and pH meters. A more detailed analysis may call for relevant to later assessments of the usability of data generated by a mobile laboratory.

For field-testing and mobile laboratories, the ABP contractors should track the transfer of samples and equipment should be examined to ensure that it is in working condition and properly calibrated. The calibration of field instruments should be performed according to the method and schedule specified in an SOP, which is usually based on the manufacturer's operating manual. Calibration of field equipment should be performed more often than specified in the SOP if equipment is used under adverse or extreme field conditions.

B5.1.2 Field Documentation

The ABP contractors' field team should record field activities in indelible ink, in a permanently bound notebook with pre-numbered pages or on a preprinted form. For each sampling event, the field team must provide the site name, physical location, date, sampling start and finish times, names of field personnel, level of protection, documentation of any deviation from protocol and signatures of field personnel. For individual samples, field teams should ensure that field logbooks document the exact location and time the sample was taken, any measurement made (with real-time equipment), a physical description of the sample, sample ID number, sampling depth, sample volume and type of sample and the equipment used to collect the sample. This information can be critical to later evaluations of the resulting data's usability.

Complete and accurate documentation is essential to demonstrate that field measurement and sampling procedures are carried out as described in this QA Program Plan or the SAP. Field personnel will use permanently bound field logbooks with sequentially numbered pages to record and document field activities. The logbook will list the contract name and number, the project name, the site name, and the names of subcontractors, the service client and the project manager. At a minimum, the following information will be recorded in the field logbook:

- Name and affiliation of all on-site personnel or visitors
- Weather conditions during the field activity
- Summary of daily activities and significant events

- Notes of conversations with coordinating officials
- References to other field logbooks or forms that contain specific information
- Discussions of problems encountered and their resolution
- Discussions of deviations from the SAP or other governing documents
- Description of all photographs taken

The contractors performing field work are expected to develop field forms to record field activities.

Individual samples should be labeled in the field. Labels should include sample location, sample number, date and time of collection, sample type, sampler's name and method used to preserve the sample, if applicable. Sample preservation involves the treatment of a sample usually through the addition of a compound that adjusts pH to retain the sample properties, including concentrations of substances, until it can be analyzed. The field team should table a listing of the total number of samples, types of sample matrices, all analyses planned for each sample differentiating critical measurements and other information that may be relevant to later assessments of the data usability.

B5.1.3 Trip Blanks

Trip blanks may be omitted unless very high levels of VOCs are encountered when either equipment blanks or field blanks are being collected. Trip blank samples are used to evaluate whether the shipping and handling procedures are introducing contaminants into the samples or if cross-contamination in the form of migration of VOCs between the collected samples. One trip blank will be submitted to the laboratory for analysis each day that samples are collected. Trip blanks for soil and water samples are VOA vials filled with purged deionized water that are transported to the field and then returned to the laboratory without being opened. Trip blanks for air samples are empty Summa® canisters or Tedlar™ bags, filled with zero air, which are transported to the field and then returned to the laboratory without being opened.

B5.1.4 Rinsate Blanks

Rinsate blanks are collected to evaluate the potential for cross-contamination of samples during collection. Rinsate blanks will be collected at a rate of one per 20 samples per matrix, or at least one per day when non-dedicated and non-disposable sampling equipment is used in the field. Equipment rinsate blanks will be obtained by passing organic-free water through or over the decontaminated sampling equipment and collecting the rinse water in appropriate sample containers.

Rinsate blanks will be analyzed for the same parameters as the associated field samples. Rinsate blanks should not contain detectable concentrations of target analytes greater than the PRQL for the compound. Any detection of target analytes in a rinsate blank will result in an investigation to determine effect on overall data usability, and affected results will be qualified as estimates or as nondetects at an elevated PRQL as appropriate.

B5.1.5 Field Duplicate Samples

Field duplicate samples of water and air samples are samples that are collected simultaneously in separate containers. The purpose of field duplicates is to allow evaluation of the contribution of random error from sampling to the total error associated with the data.

Soils and sediments are generally too heterogeneous to assess the precision of sample collection, so duplicate soil samples from a site are generally no different (statistically) from independent samples. However, the size, complexity and objectives of each project determine the sampling design for each Brownfields site. As a result, the collection of field duplicates for soils and sediments will be evaluated on a project-specific basis. Each project-specific SAP will specify as to why field duplicate samples of soil and sediment media are, or are not, needed.

For water and air samples, one set of field duplicates will be collected and submitted for every twenty field samples collected. Field duplicate precision will be evaluated as described below.

B5.1.6 Matrix Spike/Matrix Spike Duplicates (Field Requirements)

Double sample volume should be collected at a rate of one per twenty samples per matrix (minimum of once per sampling event) to ensure that the laboratory has sufficient volume to perform matrix spikes and matrix spike duplicates (MS/MSDs).

B5.1.7 Interlaboratory Split Samples (Field Requirements)

Interlaboratory split samples are field duplicates (liquid matrices) or split samples (solid matrices) that are submitted to both the primary laboratory and a secondary or QC laboratory.

Interlaboratory split samples are collected simultaneously with a sample from the same source under identical conditions into separate containers. Results from the split samples are used to assess laboratory performance by comparison of qualitative and quantitative results from the two laboratories, including indications of matrix interferences such as elevated PRQLs. In order to provide useful information, however, the split sample must be directly associated with the original (primary) sample to evaluate laboratory performance. The association will be determined by field personnel and maintained during the data import process.

B5.2 Quality Control in the Laboratory

Compliance monitoring on ADHS licensed laboratories is conducted by the Arizona Department of Health Services (ADHS) as described in Title 9, Chapter 14, Article 6 of the Arizona Administrative Code (A.A.C. R9-14-605 – Compliance Monitoring). ADEQ also conducts Technical Systems Audits on ADHS licensed laboratories (ADEQ contract laboratories and contract laboratories of consultants and contractors who submit analytical data to ADEQ). The primary goals of TSAs will be to review the laboratory organization, operation, and capabilities; determine the reliability of data; and note corrective action for any apparent deficiencies. Auditors for TSAs will be selected by the ADEQ QA/QC Supervisor based on their technical proficiency in the subject area. The designated auditors will be responsible for planning and conducting the audit, and reporting the findings to the laboratory manager and to the ADEQ QA/QC Supervisor.

B5.3 Data Quality Indicators (DQIs)

Identifying DQIs and establishing Quality Control (QC) samples and Measurement Performance Criteria (MPC) to assess each DQI, as introduced in Section 1.7, are key components of project planning and development. These components demonstrate an understanding of how “good” the data need to be to support project decisions, and help to ensure there is a well-defined system in place to assess that data quality once data collection/generation activities are complete.

When faced with addressing data quality needs in a SAP, one of the first terms you may come across is DQIs. DQIs (Precision, Accuracy/Bias, Representativeness, Comparability, Completeness, and Sensitivity) include both quantitative and qualitative terms. Each DQI is defined to help interpret and assess specific data quality needs for each sample medium/matrix and for each associated analytical operation. Section A7.2 of this QA Program Plan explains the principals along with a brief summary of information related to assessing each DQI. In addition to Section A7.2 of this QA Program Plan, ADEQ has established the following policies, procedures, and/or guidance for sample collection and analytical techniques. These procedures, where relevant, apply to all analytical data being generated for use by the ABP. These procedures should be followed unless special exceptions have been requested and approved, and/or deviations are outlined in an ABP SAP. The weblink to these documents can be found in Appendix G.

- Substantive Policy 0154 - Addressing Spike And Surrogate Recovery As They Relate To Matrix Effects In Water, Air, Sludge And Soil Matrices Policy; and
- Substantive Policy 0170 - Implementation of EPA Method 5035 - Soil Preparation For EPA Method 8015B, 8021B and 8260B.

B6: Instrument/Equipment Testing, Inspection and Maintenance

All field and laboratory analytical instruments and equipment will be tested, inspected and maintained according to the manufacturer’s guidelines and recommendations. Data collected from improperly functioning equipment will not be used.

Records for equipment testing, inspection and maintenance will be maintained in a bound logbook for each piece of equipment. The date, time, name of inspector, what was inspected and the results of testing and inspection will be recorded in the logbook. All equipment or systems requiring periodic maintenance will be inspected.

Preventive maintenance for most field equipment is carried out in accordance with procedures and schedules recommended in (1) the equipment manufacturer’s literature or operating manual, or (2) SOPs that describe equipment operation associated with particular applications of the instrument. However, more stringent testing, inspection and maintenance procedures and schedules may be required when field equipment is used to make critical measurements. A field instrument that is out of order will be segregated, clearly marked and not used until it is repaired. The field team leader will be notified of equipment malfunctions so that service can be completed quickly or substitute equipment can be obtained. When the condition of equipment is suspect, unscheduled testing, inspection and maintenance should be conducted. Any significant problems with field equipment will be reported in the daily field QC report.

The equipment testing, inspection and maintenance logs for all contractor equipment must be made available to the ABP Program or Quality Coordinator or the ABP Supervisor upon request.

B7: Instrument/Equipment Calibration and Frequency

Calibration of all analytical instrumentation is required to ensure that the analytical system is operating correctly and functioning at the sensitivity that is required to meet project-specific DQOs. Each instrument will be calibrated with standard solutions appropriate to the instrument and analytical method, in accordance with the methodology specified and at the QC frequency specified in laboratory or field sampling SOPs.

B7.1 Field-Based Instruments

Field equipment, if used, will be calibrated at the beginning of the field effort and at prescribed intervals. The calibration frequency depends on the type and stability of equipment, the intended use of the equipment and the recommendation of the manufacturer. Detailed calibration procedures for field equipment are available from the specific manufacturers' instruction manuals, and general guidelines are included in SOPs. All calibration information will be recorded in a field logbook or on field forms. A label that specifies the scheduled date of the next calibration will be attached to the field equipment. If this type of identification is not feasible, equipment calibration records will be readily available for reference. Field-based analytical instruments, such as turbidimeters and pH electrodes must be calibrated following manufacturers' instructions and frequency recommendations (or following appropriate SOPs) before they may be used for collecting data.

B7.2 Laboratory Instruments

Calibration and maintenance of analytical instruments will be conducted in accordance with the QC requirements identified in each laboratory SOP and in QA manuals, along with the manufacturers' instructions. General requirements are discussed below.

The history of calibration and maintenance for instruments in the subcontract laboratory is an important aspect of the project's overall QA/QC program. As such, all initial and continuing calibration procedures will be implemented by trained personnel following the manufacturer's instructions and in accordance with applicable EPA protocols to ensure the equipment is functioning within the tolerances established by the manufacturer and the method-specific analytical requirements.

The laboratory will obtain calibration standards from commercial vendors for both inorganic and organic compounds and analytes. Stock solutions for surrogate standards and other inorganic mixes will be made from reagent-grade chemicals or as specified in the analytical method. Stock standards will also be used to make intermediate standards that will be used to prepare calibration standards. Special attention will be paid to expiration dating, proper labeling, proper refrigeration and freedom from contamination. Documentation on receipt, mixing and use of standards will be recorded in the appropriate laboratory logbook. Logbooks must be permanently bound. Additional specific handling and documentation requirements for the use of standards may be provided in subcontractor laboratory QA plans.

The verification standards for initial calibrations should be analyzed after the instrument calibration to verify the preparation and concentration of the calibration standards. The verification standards for continuing calibrations should be analyzed (as per method requirements) to verify the calibration of the analytical system over time.

Laboratory personnel will calibrate analytical balances annually according to manufacturer's instructions and have a calibration check before each use. Balance calibration shall be documented in hardbound logbooks with pre-numbered pages.

All refrigerators and incubators will be monitored for proper temperature by measuring and recording internal temperatures on a daily basis. At a minimum, thermometers used for these measurements will be calibrated annually, according to manufacturers' instructions.

The subcontract laboratories will maintain an appropriate water supply system that is capable of furnishing ASTM Type II polished water to the various analytical areas.

B8: Inspection/Acceptance of Supplies and Consumables

The laboratory shall inspect supplies and consumables prior to their use in analysis. The description of materials provided in the method shall be used as a guideline for establishing the acceptance criteria for these materials. Purity of reagents shall be monitored by analysis of LCSs. An inventory and storage system for these materials shall assure use before manufacturers' expiration dates and storage under safe and chemically compatible conditions.

Analytical laboratories are required to provide certified clean containers for all analyses. These containers must meet EPA standards described in EPA's 1992 "Specifications and Guidance for Obtaining Contaminant-Free Sampling Containers".

Procedures for receiving supplies and consumables in the field are similar. When supplies are received, the project manager or field team leader will log the supplies into a supply logbook and then inspect all items against the acceptance criteria. Any deficiencies or problems will be noted in the field logbook, and deficient items will be returned for immediate replacement.

B9: Non-direct Measurements

Environmental data projects typically involve planning, sampling, analysis, assessment and data review. In planning their investigations, project teams generally use existing data to develop sampling designs and to decide how much and what type of data to collect. The term existing data is used interchangeably with "secondary data" and "non-direct measurements." Existing data may come from a number of sources, including other studies, government databases, etc. The original purpose for collecting these secondary data may be very different from that of the current investigation. In addition, these secondary data may have been collected using different sampling methods (composite vs. grab, random vs. hot spot sampling), and/or analytical methods than those selected for the current project.

Basing project decisions on existing data may result in errors if secondary data were not generated for the same purpose or using the same methods as the current investigation. Data could be biased and conclusions could be impacted.

Therefore, before using secondary data, project team members should evaluate the data to identify any limitations on their use. In addition, to ensure transparency in decision-making, criteria and reasons for *including* and *excluding* certain data from use must be clearly documented. Failure to clearly document why data are included or excluded can result in the appearance of biased data selection and diminish the product's credibility.

Project personnel should describe the processes for selecting and for evaluating existing data in the quality assurance plan in accordance with *EPA Requirements for Quality Assurance Project Plans* QA/R-5 <https://www.epa.gov/quality/guidance-quality-assurance-project-plans-epa-qag-5>

Sources of secondary data include the following:

- Environmental indicator data obtained from federal/state/local databases and records
- Existing sampling and analytical data from a previous investigation of the area
- Computer model simulations and applications pertaining to other studies
- Historical data (e.g., from organization's/facility's corporate records and/or federal/state local records pertaining to previous monitoring events, site assessments, investigations, etc.)
- Background information/data from organization's/facility's corporate records and/or federal/state/local records pertaining to site-specific industrial processes, process by-products, past and current chemical uses, raw material and finished product testing, waste testing and disposal practices, and potential chemical breakdown products
- Data generated to verify innovative technologies and methods
- Data obtained from computer databases (such as manufacturers' process/product information, waste management or effluent information, and EPA or state data bases)
- Literature files/searches
- Publications
- Photographs
- Topographical maps
- Meteorological data

B10: Data Management

Field data from Brownfields site assessments, such as sample ID and latitude/longitude coordinates, should be recorded on field data sheets or hand-held computers. Field data are reported to the Project Manager through submission of field notebooks or field sampling data sheets, if used, by contractor field staff.

Laboratory analytical reports will include QC results and any other necessary analytical information, enabling reviewers to determine data quality. Laboratory data is submitted to the ABP Coordinator in either printed or electronic form. Rapid turnaround data from the laboratory are reported to the Project Manager, if requested, but rapid turnaround is generally not required for Brownfields projects. Copies of field logs, a copy of chain-of-custody forms, original preliminary and final lab reports and electronic media reports must be kept for review by the ADEQ. The field crew must retain original field logs. The contract laboratory shall retain chain-of-custody forms. The contract laboratory will retain copies of the preliminary and final data reports.

Project Files

Project files contain all relevant project materials like the application, SAP and assessment reports. These files follow the ADEQ retention schedule outlined on the ADEQ intranet (<http://deq/Sites/RecordCenter/retentionschedules/SitePages/Home.aspx>). These project files are located in the Record Center, on the first floor of ADEQ.

Database Records

The ABP utilizes the following databases:

1. Arizona Unified Repository for Information Tracking of the Environment (AZURITE) – an internal database that contains project information and document tracking.
2. Assessment, Cleanup and Redevelopment Exchange System (ACRES) – an online database for Brownfields Grantees to electronically submit data directly to EPA.

Quality Assurance and Quality Control Files

QA/QC information is contained in the site files and in the Quality Management System electronic folder (Table 3).

TABLE 3. Quality Management File Locations.

Information	Location/Level
Brownfields Project SAP	Project File and J:\WPD\REMEDIAL\VRPU\BROWNFIELDS\BROWNFIELD PROJECTS
Brownfields QAPP	J:\COMMON\ADEQ QUALITY MANAGEMENT PROGRAM\QAPPs
Phase II or III ESA/field sampling data	J:\WPD\REMEDIAL\VRPU\BROWNFIELDS\BROWNFIELD PROJECTS

Table B1. Common Contaminants at Arizona Brownfields Sites and Recommended Methods for Analysis of Soil or Materials Samples

Laboratory Analytical Methods for Investigations			
Test Method →	EPA Method 8260B	EPA Method 8310 or 8270 SIM	See Footnote 3
Products			
VOCs ^{1,2}	X		
SVOCs		X	
Metals			X
Asbestos (bulk samples)	Polarized Light Microscope (PLM)		
Asbestos (floor tile)	Transmission Electron Microscope (TEM)		
Organochlorine Pesticides	EPA Method 8081A		

Footnotes:

1. Soil gas samples to be collected when analysis from soils are not expected to yield results that would be a satisfactory demonstration of whether or not a Product Type was released into the environment (e.g. soil has coarse lithology). The analytical method should be TO-15.
2. VOCs are to be analyzed using the current EPA Method 8260B (full list). For UST systems in place during 1996 or before, EPA Method 504.1 should be used to investigate for the presence of EDB (water only).
3. Metals to be analyzed are: arsenic, cadmium, chromium (total), lead and mercury. Use EPA methods 6000 and 7000 series for the analyses. Make a due diligent effort to obtain the background levels of the metals analyzed for comparison purposes.

Abbreviations: VOC = volatile organic compounds; SVOCs = semi-volatile organic compounds

Please note that when requesting compound specific analyses and the sample is petroleum based, the laboratory will be informed as such.

Please note that Appendix 1 of Title 9 (Health Services), Chapter 14 (Department of Health Services Laboratory) in the Arizona Administrative Code contains a listing of ADHS approved methods for several analytes in different mediums (see Appendix A of this QA Program Plan).

Laboratory analytical reports will include QC results and any other necessary analytical information, enabling reviewers to determine data quality. Laboratory data should be submitted to the ADEQ Project Manager in both printed and electronic form. Rapid turnaround data from the laboratory are reported to the Project Manager, if requested, but rapid turnaround is generally not required for Brownfields projects. Copies of field logs, a copy of chain-of-custody forms, original preliminary and final lab reports and electronic media reports must be kept for review by the ADEQ. The field crew must retain original field logs. The contract laboratory shall retain chain-of-custody forms. The contract laboratory will retain copies of the preliminary and final data reports.

GROUP C: ASSESSMENT AND OVERSIGHT

C1: Assessments and Response Actions

Assessment and response actions are part of the quality system for ensuring and documenting that the procedures required by this QA Program Plan, as well as by site-specific SAPs or FSPs, are being followed during the generation of data for Brownfields sites.

C1.1 Purpose/Background

During the planning process, many options for sampling, sample handling, sample analysis and data reduction are evaluated. Selection of specific options depends on the nature of the corrective action or monitoring activity. This section of the QA Program Plan describes the internal and external checks necessary to ensure that all elements are correctly implemented. In addition, checks are needed to ensure that the quality of the data is adequate and that corrective actions are implemented in a timely and effective manner. Documenting all internal assessments is a critical component of the quality system.

C1.2 Assessment Activities and Program Planning

ADEQ employs several QA assessment tools designed to provide a better understanding of the components of, and the basis for improving, the ADEQ Quality Management System. Internal (Programmatic) and External QA audits are one of the principal tools for determining the effectiveness of the ADEQ QA/QC components. QA audit frequency and scheduling will vary with the type of review conducted.

C1.2.1 Assessment of Subsidiary Organizations

A. Management System Reviews (MSRs)

An MSR is an independent assessment of a Program's QA management practices and data collection procedures, and is generally performed by the ADEQ QAM. The MSR will qualitatively assess a program to determine if the ADEQ Quality Management System is adequate to ensure the quality of the Program's data. MSRs address the effectiveness of management controls in achieving and assuring data quality, the adequacy of resources and personnel devoted to QA functions, the effectiveness of training and assessments, and the applicability of data quality requirements. While MSRs can identify significant QA concerns and areas of needed improvement, they also point out noteworthy accomplishments.

Most MSRs will examine the following elements:

- An assessment of the overall effectiveness of the QA management system, as measured by its adherence to the approved QMP
- Procedures for developing Data Quality Objectives (DQOs);
- Procedures for developing and approving QA Program Plans and QAPjPs;
- The effectiveness of existing QA Program Plan guidance and QAPjPs;
- Procedures for developing and approving SOPs;
- Procedures, criteria, and schedules for conducting QA audits;
- Tracking systems for assuring that the QA Program is operating effectively, and that corrective actions disclosed by QA audits have been taken;

- Responsibilities and authorities of various line managers, and QA personnel, for implementing the QA program;
- The degree of management support;
- The level of financial and other resources committed to implementing the QA Program

MSRs performed or arranged by the ADEQ QAM will be conducted in accordance with EPA's 2003 Guidance on Assessing Quality Systems (Management Systems Review Process).

The reviews for the individual ADEQ Quality Assurance Programs are intended to accomplish the following objectives:

- Identify any data quality problems;
- Identify benchmark practices that could be used in other Agency Programs;
- Propose recommendations for resolving quality problems;
- Confirm implementation and effectiveness of any recommended corrective actions.

C1.2.2 Assessment of Program Activities

Technical Systems Audits (TSAs)

A Technical Systems Audit is conducted to assess the sampling and analytical quality control procedures used to generate environmental data. ADEQ's QAM will use TSAs to evaluate laboratory and field procedures used by EPA, state personnel, and contractors. TSAs entail a comprehensive, on-site evaluation of the field equipment; sampling and analyses procedures; documentation; data validation; and training procedures for collecting or processing environmental data.

Laboratory TSAs

TSAs will be conducted on the Arizona Department of Health Services State Laboratory, ADEQ contract laboratories, and contract laboratories of consultants and contractors who submit analytical data to ADEQ. The primary goals of TSAs will be to review the laboratory organization, operation, and capabilities; determine the reliability of data; and note corrective action for any apparent deficiencies. Auditors for TSAs will be selected by ADEQ's QA/QC Supervisor based on their technical proficiency in the subject area. The designated auditors will be responsible for planning and conducting the audit, and reporting the findings to the laboratory manager and to ADEQ's QA/QC Supervisor.

Field TSAs

Oversight of field operations is an important part of the quality assurance process, and the ADEQ QA/QC Supervisor will conduct QA audits of field sampling activities, both for its own field operations, and on those contractors that collect samples for Programs sponsored by EPA. ADEQ will specify frequency and procedures for conducting field TSAs within specific Program areas. When project specific SAPs are reviewed, and also during any MSRs or other QA audits, ADEQ's QA/QC Supervisor will determine the necessity of field TSAs.

Specific items that may be observed during the audit include:

- Availability of approved project plans such as the SAP and Health and Safety Plan (HASP) to all project members

- Documentation of personnel qualifications and training
- Sample collection, identification, preservation, handling and shipping procedures
- Decontamination procedures used to clean sampling equipment
- Equipment calibration and maintenance
- Completeness of logbooks and other field records (including nonconformance documentation)

Performance Evaluations

ADHS uses Performance Evaluations (PEs) samples to assess the ability of a laboratory, or field measurement system, to provide reliable data as part of their certification program.

Audits of Data Quality

EPA 2001 Guidance for Quality Assurance Project Plans

(<https://www.epa.gov/sites/production/files/2015-06/documents/g5-final.pdf>) defines an audit of data quality (ADQ) as “a qualitative and quantitative evaluation of the documentation and procedures associated with environmental measurements to verify that the resulting data are of acceptable quality.” This assessment primarily involves an evaluation of the completeness of the documentation of field and analytical procedures and quality control results, and usually involves tracing the paper trail accompanying the data from sample collection and custody to analytical results and entry into a database. This technique is commonly used to verify the process involved in entering data residing in large regulatory databases.

Results of both DQAs and data quality audits can be used in a number of ways. First, they can be used in making recommendations for changes in the design and performance of data collection efforts, and in the use and documentation of QC procedures. Secondly, they can be used as a guide for the planning and acquisition of supplemental data for the project and potentially for other related projects. Problems identified through DQAs may trigger the need for an MSR to determine management deficiencies, or a TSA to identify technical problems.

Data Quality Assessments (DQAs)

A DQA refers to the process used to determine whether the quality of a given data set is adequate for its intended use. DQAs can be performed on all, or selected projects and/or data generation processes. The purpose of this type of evaluation is to determine whether the data collected are acceptable to the decision-maker or end user. Assessments generally take place at one of two points in the data generation process. First, as data are generated, aspects of the project such as surveillance of field and laboratory operations, consistency of the data with MQOs, successfully completing performance evaluation sample studies, and so forth, can be used to arrive as an assessment of whether the data are valid and acceptable. Rejected or questionable data cannot be used by ADEQ in its decision making, except in limited circumstances, such as a rough site screening.

Once data have been examined and assessed, and they are found to be of known and acceptable quality, then the results can be evaluated in the context of the Data Quality Objectives for the project. In some, but not all, cases, this may involve a statistical evaluation such as null hypothesis testing. EPA 2006 Data Quality Assessment - A Reviewers Guide guidance and EPA 2006 Data Quality Assessment - Statistical Methods for Practitioners discusses the types and uses

of statistical analyses. In others it may involve a comparison to regulatory action levels. An assessment must also be made as to whether there is a sufficient quantity of data to support program or project decisions, and whether the original sampling design was appropriate. In some cases, the data may suggest that additional data are required to achieve a higher statistical confidence level. This could be because too many data points were invalidated, that samples were not collected over a long enough time period, or that a vital sampling area not previously considered important, was missed. In other cases, an assessment might show that data of a different type are required, or that the sensitivity of the instrument used in the measurement was not adequate to meet project objectives. Thus, both types of assessments are vital to the successful completion of a project.

If necessary, ADEQ's QAM or QA Specialist can review data generated by the ADHS State Laboratory, and by contract laboratories, for the various ADEQ Programs. These data review activities use checklists, standard operating procedures, and standardized qualification codes to indicate data quality

Peer Reviews

Peer reviews are not strictly an internal QA function; rather, they are technical scientific reviews that evaluate assumptions, calculations, methods and conclusions. The ADEQ will use internal expertise to evaluate different technical aspects of the reports produced by contractors.

C1.3 Documentation of Assessments

This section identifies the organization and the person(s) that will perform the assessments, as well as the documentation of information collected during the audit.

C1.3.1 Number, Frequency and Types of Assessments

An MSR for every major Agency Program is attempted once every four years. TSAs may be routinely planned by ADEQ's QAM, specifically requested by ADEQ's Project/Case Manager, or result from the findings of another audit or review. Results will be reported to the audited organization in the form of a written report within 14 calendar days of the completion of the audit, or a mutually agreed upon alternative. Written comments by ADEQ's Project/Case Manager must be supplied to ADEQ's QAM within 14 calendar days of receipt of the audit findings, or a mutually agreed upon alternative. Copies of the TSA Audit Final Report will be stored in the project file and also with ADEQ's QAM. Additional copies will be distributed as appropriate.

C1.3.2 Assessment Personnel

MSRs and TSAs are generally conducted by ADEQ's QAM and focuses on the ABP Program's adherence to the approved Agency QMP and its Quality Assurance Program Plan.

C1.3.3 Schedule of Assessment Activities

See Section C1.3.1 above.

C1.3.4 Reporting and Resolution of Issues

Nonconformance to practices and procedures outlined in this QA Program Plan or project-

specific SAP will be addressed in a timely manner to ensure that nonconforming issues or deficiencies are corrected. The ultimate responsibility to ensure that all issues and deficiencies are satisfactorily resolved rests with the ABP Program Coordinator.

The ABP will have 30 days to prepare a written response to the reviewer's assessment memorandum. If the evaluation report recommends corrective actions, the reviewed Program should address these recommendations and include a schedule for making any appropriate changes in its quality assurance procedures. These reviews will be used by the ADEQ Leadership team to gauge the effectiveness of the Agency QMP and of the ABPs approach to data quality management.

C2: Reports to Management

Effective management of environmental data collection requires (1) timely assessment and review of all activities and (2) open communication, interaction and feedback among all project participants. This section outlines the reporting requirements for activities conducted under the ABP.

C2.1 Purpose/Background

Planned reports provide a structure for evaluating the management of program schedules, assessing the effect of deviations from approved program and project plans on data quality and determining the potential uncertainties in decisions made based on the data. QA reports keep managers and project members informed on the performance of QA/QC activities. QA reports summarize the results of project-specific audits, list any significant problems and discuss the solutions and corrective actions implemented to resolve QA/QC problems.

C2.2 Frequency, Content and Distribution of Reports

A QA report is generated by field, technical, laboratory or QA personnel and sent to the ABP Project Manager or Coordinator, as required throughout the duration of the project. The laboratory QA report is prepared by the Laboratory Manager or designee with the assistance of senior staff. The report is submitted in written or oral form, depending on the problems observed.

The contractor field team will prepare a daily progress report to summarize activities throughout the field investigation. This report will describe sampling and field measurements, equipment used, subcontractor personnel on site, QA/QC and health and safety activities, problems encountered, corrective actions taken, deviations from the QA Program Plan or SAP and explanations for the deviations. The daily progress report is prepared by the field team leader and submitted to the ABP Project Manager or Coordinator. The content of the daily reports will be summarized and included in the final report submitted for the field investigation.

The QA reports submitted for the project should include discussion of the following:

- Sampling and support equipment that were used, other than those specified in the approved QA Program or Project Plan
- Preservation or holding-time requirements for any sample that were not met
- QC checks (field and laboratory) that were found to be unacceptable

- Analytical requirements for precision, accuracy, or MDL/PQL that were not met
- Sample collection protocols or analytical methods specified in the QA Program Plan that were not met
- Any activity or event that affected the quality of the data
- Any corrective actions that were initiated as a result of deficiencies
- Any internal or external systems or performance audits that were conducted

The contractor field team will prepare a QC summary report (QCSR) that will be submitted to the ABP Program, along with (or included within) the final report for the field investigation. The QCSR will include a summary and evaluation of QA/QC activities, including any field or laboratory assessments, completed during the investigation. The QCSR will also indicate the location and duration of storage for the complete data packages. Particular emphasis will be placed on evaluating whether project MQOs were met and whether data are of adequate quality to support the required decisions as stated in the DQOs for the project.

C2.3 Identify Responsible Organizations and Individuals

The Project Contractor is responsible for preparing the project's final report and incorporating any comments received from the ABP Program Coordinator/Project Manager. The Project Contractor is responsible for ensuring that a complete environmental laboratory report is included in the project's final report. Organizational and individual roles and responsibilities are described in detail in Section A4.1 of this QA Program Plan.

GROUP D: DATA REVIEW

D1: Data Verification, Validation and Assessment

This section describes the procedures that are planned to review, verify and validate field and laboratory data. This section also discusses procedures for verifying that the data are sufficient to meet DQOs and MQOs for the project.

D1.1 Purpose/Background

Data verification, validation and assessment are done to ensure that environmental programs and decisions are supported by data of the type and quality needed and expected for the intended use.

D1.2 Data Verification

Data verification is the process for evaluating the completeness, correctness, consistency, and compliance of data and/or QC data against a standard or contract. Data verification evaluates whether sampling protocols, SOPs, analytical methods and project-specific planning documents (SAPs) are followed during data generation. Verification also involves examining the data for errors or omissions. Field and laboratory staff can verify that the work is producing appropriate outputs.

D1.3 Data Validation

Data validation is a systematic process for reviewing a body of data against a pre-established set of acceptance criteria defined in this QA Program Plan and in project-specific SAPs. Data validation is an analyte- and sample-specific process that extends the evaluation of data beyond data verification and is performed to determine the analytical quality of a specific data set.

ABP performs a partial validation on selected analytical data. This partial validation involves an examination of the data package to determine whether MQOs for precision, accuracy and sensitivity have been met. Partial validation is based on discrepancies noted during the verification step. For example, perhaps some, but not all, surrogates in a method requiring an organic extraction are outside method defined acceptance criteria, but other QC data such as precision of the measurements and blank data are acceptable. This might lead to a review that centered on surrogate recoveries. The intent of the partial validation is to qualify data so that the user is alerted that s/he should understand the limitations when making decisions based on the data.

D1.4 Data Quality Assessment

A Data Quality Assessment (DQA) refers to the process used to determine whether the quality of a given data set is adequate for its intended use. DQAs can be performed on all, or selected projects and/or data generation processes. The purpose of this type of evaluation is to determine whether the data collected are acceptable to the decision-maker of end user. Assessments generally take place at one of two points in the data generation process. First, as data are generated, aspects of the project such as surveillance of field and laboratory operations, consistency of the data with MQOs, successfully completing performance evaluation sample studies, and so forth, can be used to arrive at an assessment of whether the data are valid and acceptable. Rejected or questionable data cannot be used by ADEQ in its decision making, except in limited circumstances, such as a rough site screening.

Once data have been examined and assessed, and they are found to be of known and acceptable quality, then the results can be evaluated in the context of the DQO's for the project. In some, but not all, cases this may involve a statistical evaluation such as null hypotheses testing. In others, it may involve a comparison to regulatory action levels. An assessment must also be made as to whether there is a sufficient quantity of data to support program or project decisions, and whether the original sampling design was appropriate. In some cases, the data may suggest that additional data are required to achieve a higher statistical confidence level. This could be because too many data points were invalidated, that samples were not collected over a long enough time period, or that a vital sampling area not previously considered important, was missed. In other cases, an assessment might show that data of a different type are required, or that the sensitivity of the instrument used in the measurement was not adequate to meet project objectives. Thus, both types of assessments are vital to the successful completion of a project.

If necessary, ADEQ's QAM or designee review data generated by the ADHS State Laboratory and contract laboratories for the various ADEQ Programs. These data review activities use checklists, standard operating procedures, and standardized qualification codes to indicate data quality. The use of checklists and SOPs help standardize the data review process. The extent and level of verification for individual data sets should clearly be defined in the Project's SAP.

D2: Approaches to Verification, Validation and Assessment

The integrity of the data generated over the life of the project is confirmed by data verification and validation. The process for determining if the data satisfy program-defined requirements involves evaluating and interpreting the data, in addition to verifying that QC requirements were met. Projects planned using EPA's DQO process should produce data that provide answers to critical study questions.

The process for verifying and validating data is presented in EPA 2002 Guidance on Environmental Data Verification and Data Validation. Section 5 of this EPA guidance provides tools and techniques for data verification and validation:

<https://www.epa.gov/sites/production/files/2015-06/documents/g8-final.pdf>

D2.1 Approaches to Data Verification

Project team personnel will verify field data through reviews of data sets to identify inconsistencies or anomalous values. Any inconsistencies discovered will be resolved as soon as possible by seeking clarification from field personnel responsible for data collection. All field personnel will be responsible for following the sampling and documentation procedures described in the project SAP so that defensible and justifiable data are obtained.

Laboratory personnel will verify analytical data at the time of analysis and reporting and through subsequent reviews of the raw data for any nonconformance to the requirements of the analytical method. Laboratory personnel will make a systematic effort to identify any outliers or errors before they report the data. Outliers that are found to be the result of errors will be identified and corrected; outliers that cannot be attributed to errors in analysis, transcription, or calculation will be clearly identified in the case narrative section of the analytical data package. All analytical data generated for ABP projects are to be verified by the laboratory.

Verified data are checked for a variety of topics including transcription errors, correct application of dilution factors, appropriate reporting of dry weight versus wet weight and correct usage of conversion factors, among others. Verified data may have laboratory qualifiers. Verified data are one output of this process.

A second output from the verification process is documentation, which may include a certification statement signed by the laboratory manager and included in the data package. Narratives on technical issues, non-compliance and any corrective action taken are included in the laboratory data package. Records from field activities are likely to be logbooks or handwritten notes, all of which should be dated and signed.

The laboratory QA manual must be used to accept, reject or qualify the data generated by the laboratory. The laboratory management is responsible for validating the data generated by the laboratory. The laboratory personnel must verify that the measurement process was "in control" (i.e., all specified MQOs for the DQIs were met, or acceptable deviations are explained) for each batch of samples before proceeding with analysis of a subsequent batch. In addition, each laboratory must establish a system for detecting and reducing transcription and/or calculation errors prior to reporting data. Only data that have met MQOs, or data that have acceptable deviations explained, shall be submitted by the laboratory. When QA requirements have not been met, the samples will be reanalyzed when possible, and only the results of the reanalysis will be submitted, provided these results are acceptable.

D2.2 Approaches to Data Validation

Data validation determines the analytical quality of data within a specific data set; it is an analyte- and sample-specific process based on achieving the MQOs set forth in the planning documents for the project. Validation assesses whether data quality goals specified in the planning phase have been achieved. Unlike data verification, which may be done by the laboratory, data validation is typically performed by a qualified person who is not affiliated with the laboratory. Validation of analytical data for the ABP is performed by ABP Program Coordinator or, upon request, Technical Support.

The level of data validation depends on the size and complexity of the project and the decisions to be made. Basically, data validation is the process of evaluating the available data against the project MQOs to make sure that the objectives are met. cursory validation is performed on ABP projects. If full data validation is ever needed on an ABP project, the QAM will be notified. Criteria for data validation are summarized in Table D-1.

The personnel validating the data should be familiar with the project-specific MQOs. So, the validator should have access to the QA Program Plan, SAP, SOPs and approved analytical methods. The validator must identify these and other project records, obtain records produced during data verification, and validate the records by determining whether the data quality meets goals established in the planning documents.

Data validation generally includes the following steps:

Validation of Field Data

- 1 Evaluate field records for completeness and consistency
- 2 Review field QC information
- 3 Summarize deviations and determine effects on data quality
- 4 Summarize number and type of samples collected

Validation of Laboratory Data

- 1 Assemble planning documents and data to be validated. Review data verification records to determine method, procedural and contractual QC compliance or noncompliance;
- 2 Review verified, reported sample results collectively for the data set as a whole, including laboratory qualifiers;
- 3 Summarize data and QC deficiencies and evaluate the impact on overall data quality;

Any field or laboratory data that did not meet the quality goals established in the planning documents are summarized in a comment letter to the eligible applicant or environmental consultant to the project.

D2.3 Approaches to Data Assessment

The purpose of a data assessment is to integrate all aspects of data generation to determine the usability of the data. The final step in the process is to compare the data obtained to the DQOs established by the program in its QA Program Plan or else in project-specific planning documents. Aspects of the sampling program evaluated during the data assessment include sampling design, sample collection procedures and sample handling. Analytical procedures (both field and laboratory) and QC procedures are also reviewed during the process. Field and laboratory instrument calibration logbooks are maintained by the environmental consultant and laboratories, respectively, and are reviewed by the appropriate ABP personnel (Program Coordinator, Technical Support and/or QA/QC Supervisor) on an as needed basis. Please note that this activity is rarely needed for the ABP. Criteria for evaluating all aspects are provided in the following paragraphs.

D2.3.1 Sampling Design

Samples should conform to the type and location specified in the project-specific SAP. Any deviations should be noted, along the likely effect on the usability of the data for its intended purpose. An overview of sampling design is also discussed in Section B1.1 of this QA Program Plan. EPA also provides guidance in its 2002 Guidance on Choosing a Sampling Design for Environmental Data Collection: <https://www.epa.gov/sites/production/files/2015-06/documents/g5s-final.pdf>

D2.3.2 Sample Collection Procedures

The data reviewer (i.e. typically the field team leader from the contracted environmental consultant) should verify that the appropriate specified methods were used during sampling. The reviewer should:

- 1 Evaluate the field records for consistency
- 2 Review QC information
- 3 Summarize deviations and determine their effect on data quality
- 4 Summarize the samples collected
- 5 Prepare a field data verification summary

Improper field practices can compromise the usability of a data set. Specific issues to look for include mislabeling of sample containers, problems with field instruments, improper documentation (such as failure to properly fill in the log book), improper collection of VOC samples (such as leaving a cap off a container or collecting VOC samples from a well-mixed composite sample), biasing sampling locations or forgetting to obtain location information for each sample, improper purging of monitoring wells, improper decontamination procedures or intentionally cutting corners by collecting many samples from one location to save time.

For preparation of the field data verification summary, the field team leader evaluates field records and notebooks for consistency with field methods and procedures described in the SAP to assure that these procedures were followed properly or that deviations from the procedures still yield data of acceptable quality. The verification summary should include observations on (1) the consistency and completeness of field records, (2) the adequacy of field QC information, (3) any deviations from SAP procedures and the probable effect of the deviations on data quality and (4) the number and types of samples collected and how this compares with specifications in the SAP.

The different parts of the data verification summary are typically incorporated into the final deliverable to the ABP for review. ABP personnel can request from the environmental consultant copies of field records and notebooks for their own review on an as needed basis.

Most qualified sampling contractors and State and Federally certified laboratories develop SOPs and analytical methods as part of their overall corporate QA program. SOPs should be developed following EPA 2007 Guidance for Preparation of Standard Operating Procedures for Quality-Related Operations. <https://www.epa.gov/sites/production/files/2015-06/documents/g6-final.pdf>. The field team should document which SOPs they are using in the field and any deviations from an SOP. Appendix F lists the web link to EPA generated SOPs.

D2.3.3 Sample Handling

QA personnel should confirm that samples were handled in accordance with protocols required in the QA Program Plan and project-specific SAP. Sample containers and preservation methods should be confirmed as appropriate for the nature of the sample and type of data generated from the sample. Chain-of-custody records and storage conditions should be checked to ensure the representativeness and integrity of the samples.

D2.3.4 Analytical Procedures

Section B4 of this QA Program Plan identified the requirements of analytical methods used to generate the data. Each sample should be verified to ensure that the procedures used to generate the data were implemented as specified. Acceptance criteria for these data follow those used in data validation, with suitable codes to characterize any deviations from the procedure.

D2.3.5 Quality Control

Section B5 of this QA Program Plan specified the QC checks that should be performed during sample collection, handling and analysis. Here, the QA reviewer should confirm that results for QC samples were evaluated against acceptance criteria (i.e., MQOs) specified in Section B.

D2.3.6 Calibrations

Section B7 of this QA Program Plan addressed the calibration of instruments and equipment and the information required to ensure that the calibrations (1) were performed within an acceptable timeframe prior to generation of measurement data; (2) were performed in proper sequence, included the proper number of calibration points; (3) were performed using standards that bracketed the range of reported measurements (i.e., were within the linear working range of the instrument) and (4) had acceptable linearity checks to ensure the measurement system was stable when the calibration was performed. The environmental consultant contracted to collect field samples for the ABP is responsible for the calibration of all field sampling equipment. Contracted environmental laboratories are responsible for the calibration of all laboratory equipment used to analyze samples associated with all samples collected for the ABP. All equipment and instrument calibrations shall be recorded in an appropriate log book and be made available to ABP personnel upon request.

D2.3.7 Data Reduction and Processing

Internal checks by laboratory staff should verify the integrity of the raw data generated by the analyses. EDDs automatically produced by the laboratory should help minimize data entry errors. Steps in data reduction should be clearly documented so that the validity of the analysis can be properly assessed.

Data should be cross-checked to confirm consistency or comparability in analytical methods and detection limits, units of measurement, compatibility of file types or software and other critical factors that affect how the data will ultimately be interpreted to influence conclusions and recommendations.

D3: Reconciliation with Data Quality Objectives

After the data have been verified and validated, the data are evaluated against project DQOs. Implementation of the DQA process completes the data life cycle by providing the assessment needed to determine if project objectives were achieved.

EPA guidance documents on DQA are available from EPA at EPA Quality Management Tools for Projects http://www.epa.gov/quality/qa_docs.html. DQA is the scientific and statistical evaluation of environmental data to determine if they meet the planning objectives of the project, and thus are of the right type, quality and quantity to support their intended use. Data Quality Assessment - A Reviewers Guide broadly describes the statistical aspects of DQA in evaluating environmental data sets. A more detailed discussion on implementation of graphical and statistical tools is found in the companion guidance document on statistical methods for practitioners (Data Quality Assessment - Statistical Methods for Practitioners <https://www.epa.gov/sites/production/files/2015-08/documents/g9s-final.pdf>). These EPA guidance documents discuss the use of DQA to support environmental decision-making (e.g., compliance determinations).

The DQA process is built on a fundamental premise: data quality is meaningful only when it relates to the intended use of the data. Data quality does not exist in a vacuum; a reviewer needs to know in what context a data set is to be used, in order to establish a relevant yardstick for judging whether or not the data are acceptable. By applying the DQA process, a reviewer can answer four important questions:

- 1 Can a decision (or estimate) be made with the desired level of certainty, given the quality of the data?
- 2 How well did the sampling design perform?
- 3 If the same sampling design strategy is used again for a similar study, would the data be expected to support the same intended use with the desired level of certainty?
- 4 Is it likely that sufficient samples were taken to enable the reviewer to see an effect if there really were an effect? That is, is the quantity of data sufficient?

D3.1 Purpose/Background

This section outlines methods for evaluating the results obtained from the sampling and analysis. Scientific and statistical evaluations of the data are used to determine if the data collected are of the right type, quantity and quality to support their intended use and to adequately address the primary study questions.

Please note that ABP projects rarely employ statistical evaluations of the data collected. This is because biased sampling is most always the appropriate method for collecting samples for ABP projects. For the rare occasion when an ABP project needs a statistical evaluation, confidence intervals (step 3 of the “Five Steps of Statistical DQA” in Section D3.2 below) is the statistic that would most likely best fit the ABP project. If statistical evaluation other than confidence intervals is needed, a contractor would be selected to perform independent statistical evaluations in accordance with the DQA process outlined in this QA Program Plan.

D3.2 Reconciling Results with Program Objectives or DQOs

EPA guidance documents for data evaluation (EPA 2006) describe an iterative five-step process called the “Five Steps of Statistical DQA”:

- 1 Review the DQOs and sampling design described in the project planning documents.
- 2 Conduct a preliminary data review or exploratory data analysis to understand the character and structure of the data set and to evaluate whether there are any anomalies in the data that may not have been noticed during data verification and validation. Are there outliers or other anomalies that should be further investigated before continuing with statistical testing?
- 3 Select a statistical test. Choose appropriate statistical tests based on the characteristics of the data and the questions that the investigation was intended to address.
- 4 Verify the assumptions of the statistical tests and assess the effect that violations of test assumptions may have on the result (i.e., is the test sufficiently robust to provide a valid result at a reasonable level of confidence?) and consider other factors (i.e., Are there effects of seasonality that must be considered? Would alternative statistical tests be better suited to the data than the tests proposed in the planning documents?).
- 5 Draw conclusions from the data. Using multiple lines of evidence, the results of statistical tests and professional judgment, the data analyst should be able to provide conclusions and recommendations for the site. In some cases, the conclusion may be that more data are needed to answer the primary study questions.

If DQOs have not been adequately developed, the analyst may need to review the planning documents and sampling design, and then define the statistical hypotheses to be tested and establish tolerable limits on decision errors.

When the DQOs are qualitative, judgmental sampling is utilized and statistical tools are not appropriate, the ADEQ will still systematically assess data quality and data usability. This DQA assessment – Four Steps of DQA for Qualitative DQOs - will include the following:

1. A review of the sampling design and sampling methods to verify that these were implemented as planned and are adequate to support project objectives;
2. A review of project-specific MQOs for precision, accuracy, representativeness, completeness, comparability and quantitation limits to evaluate whether acceptance criteria have been met;
3. A review of project-specific DQOs to assess whether they have been achieved by the data collected; and
4. An evaluation of any limitations associated with the decisions to be made based on the data collected. For example, if data completeness is only 90 percent compared to a project-specific completeness objective of 95 percent, the data may still be usable to support a decision, but at a lower level of confidence.

D3.2.1 Review DQOs and Sampling Design

Step 1 of the DQA process should (1) document or define the project specific DQOs, (2) verify that the hypothesis is consistent with project objectives and (3) identify any deviations from the sampling plan and assess the potential effect of the deviations.

The objectives of the study should be reviewed in order to provide a context for analyzing the data. If a systematic planning process has been implemented before the data are collected, then this step reviews the study objectives to evaluate whether project goals have been met and whether the study questions have been adequately answered. If no clear planning process was used, the reviewer should:

- Develop a concise definition of the problem (DQO Step 1) and of the methodology of how the data were collected (DQO Step 2). These two steps should provide the fundamental reason for collecting the environmental data and identify all potential actions that could result from the data analysis.
- Identify the target population and determine if any essential information is missing (DQO Step 3). If so, either collect the missing information before proceeding, or select a different approach to resolving the problem.
- Specify the scale of determination (any subpopulations of interest) and any boundaries on the study (DQO Step 4) based on the sampling design. The scale of determination is the smallest area or time period to which the conclusions of the study will apply. The apparent sampling design and implementation may restrict how small or how large the scale of determination can be.
- Evaluate whether the data support the conclusions offered (DQO Step 5)

The overall type of sampling design and the manner in which data were collected will likely place constraints on how the data can be used and interpreted. The data analyst should assess whether features of the design support or contradict the stated objectives of the study. Were there deviations from the planned design? What might be the effect of these deviations? Are data adequate to address the primary study questions? How do these objectives translate into statistical hypotheses (null and alternative hypotheses)?

The design and sampling strategy should be discussed in clear detail in the project-specific SAP. The overall type of sampling design and the manner in which samples were collected or measurements were taken will place conditions and constraints on how the data can be used and interpreted.

A key distinction in sampling design is between judgmental sampling (also called authoritative or biased sampling), in which sample numbers and locations are selected based on expert knowledge of the problem, and probability-based sampling, in which sample numbers and locations are selected based on randomization, and each member of the target population has a known probability of being included in the sample. Judgmental sampling has some advantages and is appropriate in some cases. This type of sampling should be considered when the objectives of the investigation are not of a statistical nature (for example, when the objective of a study is to identify specific locations of leaks/hot spots or when the study is focused solely on the sampling locations themselves). Generally, conclusions drawn from judgmental samples apply only to those individual samples.

Probabilistic sampling typically takes more effort to implement than judgmental sampling, because systematic or random locations must be selected for sampling. However, a probability-based sampling design has the advantage of allowing the use of statistical tests, which permit confidence and uncertainty of the results to be specified. Probability-based designs do not preclude the use of expert knowledge or the use of existing data to establish the sampling design. An efficient sampling design is one that uses all available prior information to stratify the site (in order to improve the representativeness of the resulting samples) and set appropriate parameters. Common types of probabilistic sampling designs include the following:

- Simple random sampling – the method of sampling where samples are collected at random times or locations throughout the sampling period or study area.
- Stratified sampling – a sampling method where a population is divided into non overlapping subpopulations called “strata,” and sampling locations are selected randomly within each stratum using a random or systematic sampling design.
- Systematic and grid sampling – a randomly selected unit (in space or time) establishes the starting place of a systematic pattern that is repeated throughout the population. With some important assumptions, can be shown to be equivalent to simple random sampling.
- Ranked set sampling – a field sampling design where expert judgment or an auxiliary measurement method is used in combination with simple random sampling to determine which locations should be sampled.
- Adaptive cluster sampling – a sampling method in which some samples are taken using simple random sampling, and additional samples are taken at locations where measurements exceed some threshold value.
- Composite sampling – a sampling method in which multiple samples are physically mixed into a larger sample and samples for analysis drawn from this larger sample. This technique can be highly cost-effective (but at the expense of variability estimation) and had the advantage it can be used in conjunction with any other sampling design. (Multi-increment sampling is a particular form of composite sampling, and may be an effective design for certain types of sites to answer certain types of questions).

Regardless of the type of sampling scheme, the reviewer should review the description of the sampling design and look for design features that support the project objectives. For example, if the goal of the study is to make a decision about the average (defined here as the arithmetic mean) concentration of a contaminant in an effluent stream over time, then composite samples may be an appropriate sampling design. On the other hand, if the goal of the study is to find hot spots of contamination at a hazardous waste site, compositing should be used with caution, to avoid "averaging away" hot spots.

The reviewer should also look for potential problems in the implementation of the sampling design. For example, if simple random sampling was used to collect the data, can the reviewer be confident that the sampling locations or data point were truly random? Small deviations from a sampling plan probably have minimal effect on the conclusions drawn from the data set, but the effects of significant or substantial deviations should be carefully assessed. Finally, the reviewer should verify that the data are consistent with the project-specific SAP or FSP and the overall objectives of the study.

D3.2.2 Conduct Preliminary Data Review

Step 2 of the DQA process reviews graphical representations of the data and calculates some basic statistical quantities. By reviewing the data both numerically and graphically, the reviewer can understand the structure of the data, and thereby identify appropriate use of the data.

Statistical quantities numerically describe the data. The quantities that are typically calculated include the arithmetic or geometric mean, the median and other percentiles and the standard deviation. These quantities provide estimates of characteristics for the sample population and allow one to make inferences about the population from which the data were drawn. Graphical representations permit the reviewer to identify patterns and relationships within the data, confirm or disprove assumptions and identify potential problems.

The preliminary data review allows the reviewer to understand the structure and characteristics of the data set and the population from which these data were drawn. Graphical depictions of the data permit the analyst to identify anomalies that may require further investigation or perhaps even reanalysis by the laboratory. Output from DQA Step 2 typically includes (1) tables of summary statistics and (2) graphs and/or statistical plots of the data.

D3.2.3 Select Statistical Test

Under Step 3 of the DQA process, the data analyst selects the most appropriate statistical test or method for evaluating the data. The statistical method will be selected based on the sampling plan used to collect the data, the type of data distribution and the assumptions made in setting the DQOs, noting any deviations from these assumptions. Conclusions about other aspects of the data set or the stated null hypothesis are made based on the results of this evaluation. EPA DQA guidance provides a discussion (with mathematical formulas and examples for conducting statistical tests) of the process for statistically evaluating environmental data. Detailed technical information that reviewers can use to select appropriate procedures may be found in Chapter 3 of EPA's 2006 Data Quality Assessment: Statistical Methods for Practitioners <https://www.epa.gov/sites/production/files/2015-08/documents/g9s-final.pdf>

For the rare occasion when an ABP project needs a statistical evaluation, confidence intervals (step 3 of the "Five Steps of Statistical DQA" in Section D3.2 above) is the statistic that would

most likely best fit the ABP project. For example, the project's objective may be to estimate the average level of pollution for a particular contaminant. A reviewer can describe the desired (or achieved) degree of uncertainty in the estimate by establishing confidence limits within which one can be reasonably certain that the true value will lie. When interpreting a confidence interval statement such as "The 95% confidence interval for the mean is 19.1 to 26.3", the implication is that the best estimate for the unknown population mean is 22.7 (halfway between 19.1 and 26.3), and that we are 95% certain that the interval 19.1 to 26.3 captures the unknown population mean.

If a particular statistical procedure was specified in the project work plan, the reviewer should use the results of the preliminary data review to determine if the procedure is appropriate for the data collected. If not, then the reviewer should document why the procedure is deemed inappropriate, and then select a different method. Chapter 3 of EPA 2006 Data Quality Assessment: Statistical Methods for Practitioners <https://www.epa.gov/sites/production/files/2015-08/documents/g9s-final.pdf> provides alternatives for several statistical procedures. If a particular procedure has not been specified, then the reviewer should select a statistical test or method based on the study objectives, results of the preliminary data review, and key assumptions necessary for the method.

All statistical tests make assumptions about the data. For instance, the t-test, which is a parametric test used to compare two data sets, assumes that each data set approximates a normal distribution and that the two data sets have approximately equal variance. In contrast to parametric tests like the t-test, nonparametric tests make much weaker assumptions about the distributional form of the data. However, both parametric and nonparametric tests assume that the data are derived from statistically independent samples. Common assumptions of statistical tests include distributional form of the data, independence, dispersion characteristics, approximate homogeneity and the basis for randomization in the sampling design. For example, the one-sample t-test assumes random and independent samples, an approximately normal distribution, no outliers and no more than a small percentage of non-detections.

Statistical methods that are insensitive to small or moderate departures from the assumptions are called "robust." However, some tests rely on the data meeting certain key assumptions in order for the test results to be valid. The reviewer should note any sensitive assumptions where relatively small deviations could jeopardize the validity of the test results.

After completing Step 3 of the DQA process, the data analyst or reviewer should have selected appropriate statistical tests and noted the critical assumptions of the statistical tests.

D3.2.4 Verify Assumptions of Statistical Tests

The validity of a statistical test or method depends on the key assumptions underlying the test, and whether the data violate these assumptions. Minor deviations from assumptions are usually not critical if the statistical technique is sufficiently robust to compensate for such deviations.

If the data do not show serious deviations from the key assumptions of the statistical method, then the DQA process continues to Step 5, 'Draw Conclusions from the Data.' However, it is possible that if one or more of the assumptions are called into question, this could require a reevaluation of which test may be most appropriate for the data. It is true that some deviations do not invalidate the results of a statistical test, but this should be confirmed here in Step 4 of the DQA process. For example, deviation from normality may not be seriously important for a large sample size, but could be critically important for a small sample size.

This step in the DQA process is an important check on the validity and reliability of the conclusions that are drawn. Outputs from this step include documentation of the method used to verify assumptions and verification that the test results are valid. Additionally, the reviewer should provide a description of any corrective actions that were taken.

D3.2.5 Draw Conclusions from Data

Step 5 of the DQA process represents the culmination of the planning, implementation and assessment phases of the project operations. In this step, the data analyst draws conclusions that address the project objectives. All of the analysis and review conducted in Steps 1 through 4 should ensure that the conclusions drawn in Step 5 adequately address project objectives in a scientifically defensible manner.

In Step 1, the project objectives are reviewed (or developed retrospectively) and the sampling design is evaluated. In Step 2, the implementation of the sampling scheme is reviewed and a preliminary picture of the data set is developed. In Step 3, the appropriate statistical tests are selected. Finally, the underlying assumptions of the statistical test are verified in Step 4.

Conclusions drawn in the final step of the DQA process allow the reviewer or data analyst to present valid statistical results with a specified level of significance. The confidence and power of the tests are stated, along with the study conclusions in plain English. Finally, the data analyst provides an assessment of the overall performance of the sampling design and identifies additional data that may be needed (that is, data gaps are identified).

If data were collected using a judgmental sampling design or if few samples were collected, professional judgment rather than formal statistical testing may be applied to draw conclusions. Or, statistical tests may be applied, recognizing that the results may present a biased “worst-case scenario.” For example, if the data from biased samples (e.g., selective sampling of visibly stained soils) are used in a one-sample statistical test to compare concentrations against a cleanup standard or action level, and test results show that concentrations do not exceed the action level, then a conclusion can be drawn. If test results show that concentrations do exceed the action level, then, in formulating conclusions, the reviewer should balance the test results against the knowledge that the data were biased toward the sampling of “hot spots.”

D4: Revisions to the QA Program Plan

Throughout the life of the ABP, there may be changes to program requirements, or modifications to the way environmental data are collected, or changes to how enforcement activities are defined. Therefore, this QA Program Plan is recognized as a dynamic document that is subject to revision, as needed. The ABP Program, technical support and QA/QC personnel will examine and revise this QA Program Plan annually, although the plan will only be resubmitted to EPA Region 9 QA manager for review once every five years or as otherwise needed. Approved revisions will be disseminated to personnel included on the Distribution List (page 6).

Table D1 – Criteria for Cursory and Full Data Validation

Analytical Group	Criteria for Cursory Data Validation	Criteria for Full Data Validation
CLP Organic Analyses	<ul style="list-style-type: none"> ● Holding times ● Calibration ● Blanks ● Surrogate recovery ● Matrix spike and matrix spike duplicate recovery ● Laboratory control sample or blank spike ● Internal standard performance ● Field duplicate sample analysis ● Temperature ● Overall assessment of data for an SDG 	<ul style="list-style-type: none"> ● Holding times ● Gas Chromatography/Mass Spectroscopy tuning ● Calibration ● Blanks ● Surrogate recovery ● Matrix spike and matrix spike duplicate recovery ● Laboratory control sample or blank spike ● Internal standard performance ● Field duplicate sample analysis ● Compound identification ● Target compound list identification ● Compound quantitation and reported detection limits ● Tentatively identified compounds ● System performance ● Temperature ● Overall assessment of data for an SDG
CLP Inorganic Analyses	<ul style="list-style-type: none"> ● Holding times ● Calibration ● Blanks ● Matrix spike recovery ● Matrix duplicate sample analysis ● Laboratory control sample or blank spike ● Field duplicate sample analysis ● Temperature ● ICP serial dilution ● Overall assessment of data for an SDG 	<ul style="list-style-type: none"> ● Holding times ● Calibration ● Blanks ● ICP interference check sample ● Matrix spike recovery ● Matrix duplicate sample analysis ● Laboratory control sample ● Field duplicate sample analysis ● Graphite furnace atomic absorption QC ● Sample result verification ● Temperature ● ICP serial dilution ● Detection limits ● Overall assessment of data for an SDG

Notes:

- CLP Contract Laboratory Program
- ICP Inductively coupled plasma (emission spectroscopy)
- SDG Sample delivery group
- QC Quality Control

APPENDIX A: ADHS APPROVED ANALYTICAL METHODS

Arizona Administrative Code for Department of Health Services Laboratories – Approved Analytical Methods contained within Code

http://www.azsos.gov/public_services/Title_09/9-14.htm

APPENDIX B: STATE RESPONSE GRANT APPLICATION

<http://www.azdeq.gov/environ/waste/cleanup/download/Brownfields%20SRG%20Application%2006%2027%2014.pdf>

[Sampling and Analysis Plan Guidance and Template for Brownfields Assessment Projects \[Version 4, August 2018\] \(.docx\)](#)(111 pp, 305 K, August 2018)

Version 4 of this template is intended to assist organizations in documenting the procedural and analytical requirements for Brownfields Assessment projects involving the collection of water, soil, sediment, or other samples taken to characterize areas of potential environmental contamination.

APPENDIX D: ARIZONA ADMINISTRATIVE CODE FOR SOIL REMEDIATION STANDARDS

http://www.azsos.gov/public_services/Title_18/18-07.htm

APPENDIX E: ARIZONA ADMINISTRATIVE CODE FOR WATER QUALITY STANDARDS

http://www.azsos.gov/public_services/Title_18/18-11.htm

APPENDIX F: STANDARD OPERATING PROCEDURES

This appendix contains references and web addresses for numerous standard operating procedures (SOPs) from the U.S. Environmental Protection Agency (EPA). General sampling guidelines are included in the EPA SOP on General Field Sampling Guidelines. SOPs delineate the step-by-step approach that field personnel must follow in collecting samples, taking field measurements, decontaminating equipment, handling IDW and calibrating instruments. Most qualified sampling contractors and State and Federally certified laboratories develop SOPs and analytical methods as part of their overall QA program. SOPs should be developed following “Guidance for Preparing Standard Operating Procedures (SOPs) EPA QA/G-6” (EPA 2007).

<https://www.epa.gov/sites/production/files/2015-06/documents/g6-final.pdf>

The field team should document which SOPs they are using in the field and any deviations from an SOP. EPA SOPs for field sampling methods are available for download at:

https://response.epa.gov/site/site_profile.aspx?site_id=2107

Field personnel will ensure that all sampling equipment has been properly assembled, decontaminated and calibrated, and is functioning properly prior to use. Equipment will be used according to manufacturer's instructions, and should generally be decontaminated according to the EPA SOP for Sampling Equipment Decontamination.

APPENDIX G: ADEQ SPECIFIC QUALITY ASSURANCE GUIDANCE AND POLICIES

ADEQ Quality Management Plan

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ADEQ Addressing Spike and Surrogate Recovery As They Relate to Matrix Effects in Water, Air, Sludge and Soil Matrices Policy

Substantive Policy 0154 - Addressing Spike And Surrogate Recovery As They Relate To Matrix Effects In Water, Air, Sludge And Soil Matrices Policy;
<http://legacy.azdeq.gov/function/laws/download/2014/154.000%20-%20Addressing%20Spike%20and%20Surrogate%20Recovery%20as%20they%20relate%20to.pdf>

ADEQ Implementation of EPA Method 5035

Substantive Policy 0170 - Implementation of EPA Method 5035 - Soil Preparation for EPA Method 8015B, 8021B and 8260B.
http://legacy.azdeq.gov/function/laws/download/2014/0170_000.pdf

ADEQ Soil Vapor Guidance Document

http://static.azdeq.gov/legal/subs_policy_svsg.pdf

ADEQ Investigative Derived Waste

<http://legacy.azdeq.gov/function/laws/download/policy/4013.001.pdf>