

DSHM-HW-05-15 Quality Assurance Project Plans (QAPjP)
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New York State Department of Environmental Conservation

DEC Program Policy

Issuing Authority: Carl Johnson, Deputy Commissioner

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Latest Date Revised:

I. SUMMARY

This Program Policy was formerly identified as TAGM HW-91-15.

This Policy provides technical assistance to Resource Conservation and Recovery Act (RCRA-C) facilities and Department staff in producing and reviewing Quality Assurance Project Plans.

II. POLICY

This policy must be followed by a RCRA facility or by Division staff when developing any of the following (variance from specific requirements of the guidance may be applied for on a case-by-case basis):

1. RCRA Facility Assessment - Sampling Visit Work Plans;
2. RCRA Facility Investigation Work Plans;
3. RCRA Closure Plans;
4. RCRA Groundwater Compliance Monitoring Program Sampling and Analysis Plans; and
5. RCRA Corrective Measure Monitoring Program Sampling and Analysis Plans.

This policy concerns itself solely with sampling and analysis plans prepared for a corrective measure(s) program over which this Division has jurisdiction. Monitoring programs developed pursuant to wastewater and air emission discharge permits are not subject to this Division's Quality Assurance Project Plans (QAPjP) requirements. However, a monitoring program instituted as part of a RCRA investigation would be required to comply with the QAPjP guidance. For example, if during the investigation, an air monitoring program is required, that program would then have to be in accordance with this guidance document.

QAPjPs, also referred to as QA Work Plans, must be prepared and reviewed against this policy. The policy shall be followed by all RCRA facilities required to prepare and submit QAPjPs that address sampling and analysis of environmental media. Waste analysis plans submitted with Part 373, permit applications pursuant to 6NYCRR 373-2.2(e), and work plans for compliance monitoring implemented during inspection of RCRA facilities, are not required to conform to this policy. This QAPjP policy supersedes the RCRA Facility Assessment - Sampling Visit Work Plan Guidance, issued 7/22/89.

III. PURPOSE AND BACKGROUND

This policy was developed to ensure receipt of a technically complete and acceptable Quality Assurance Project Plan (QAPjP), and to maintain consistency when sampling and analyzing environmental media for Division RCRA-C programs. Copies of the RCRA **Quality Assurance Project Plan** Guidance Manual and associated forms may be obtained by contacting the Quality Assurance Officer in the Chemistry & Laboratory Services Section in the Bureau of Pesticides Management. The QAPjP must present sufficient information on quality assurance (QA) and quality control (QC) programs that, when implemented, will result in generating and documenting high quality data. Such data allows better and more confident decisions to be made regarding site characterization, corrective measure(s) selection, and corrective measure(s) performance.

The QAPjP should provide specific details on procedures for sampling, handling, and analyzing environmental media samples. More adequate quality control and consistency will be maintained when such procedures adhere to those requirements set forth in the appropriate appendices to the guidance.

The individual designated as the project manager (i.e., an engineer or geologist) will be responsible for completing an administrative review of the project's QAPjP. This review shall consist of examining the QAPjP contents to assure that all relevant elements are provided and to establish their location within the QAPjP or in any supporting documents (i.e., a Field Sampling Plan and a Quality Assurance Program Plan).

Following the administrative review by the project manager, a technical review shall be conducted to assure the acceptability of all elements in the plan. The technical review should be carried out concurrently by the project manager, the geologist, and the chemist assigned to the project in order to expedite the review. In order to facilitate the two reviews a QAPjP check-list was developed. The check-list indicates the particular elements in the plan to be reviewed for technical acceptability by the designated reviewer. The designated reviewer may be the engineer, geologist, chemist, or some combination thereof. However, this does not preclude review and comment by non-designated reviewers.

After receipt, the project manager shall consolidate all relevant comments and submit them to the facility. To expedite this consolidation, all comments should be prepared in a format which will result in a complete set of comments, without rewriting, to be sent to the facility. All reviewers should receive a copy of the comments to be sent to the facility.

The project manager shall see that all check lists are maintained as part of the permanent administrative record for the project.

IV. RESPONSIBILITY

The responsibility for interpreting and updating this document resides in the Department's Division of Solid & Hazardous Materials, Bureau of Pesticides Management, Chemistry & Laboratory Services Section, 518-402-8788.

V. PROCEDURE

All QAPjPs must address the sixteen (16) elements on the Quality Assurance Project Plan check-list individually or collectively. Should a particular element not be relevant to a project, a brief explanation for its absence must be included in the plan. For some projects it may be appropriate and acceptable for a facility to submit the Field Sampling Plan as a separate document which is only referenced in the QAPjP. This approach may also be followed by having the laboratory responsible for sample analysis submit their Quality Assurance Program Plan and reference that plan's contents in the appropriate sections of the QAPjP.

Project managers are responsible for providing the facility with the necessary guidance on developing a QAPjP. Direct interaction by the project manager with the facility should occur early in the project to address data quality objectives (DQOs). The DQOs are established to ensure that the data collected are sufficient and of adequate quality for their intended use. Therefore, QAPjP development should begin only after certain pertinent and relevant DQOs have been agreed to by all parties. DQOs that will require early agreement include, but are not limited to, a project's objectives, contaminants of concern, action levels, target clean-up levels, and analytical and detection limit requirements.

RELATED REFERENCES

RCRA Quality Assurance Project Plan Guidance
Project Officer, Steve Kaminski, dated March 28, 1991

If you have any questions, please contact:

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