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|  Monitoring Method GuidanceCN 0.70c **(October 2022)** | qapp SUBMITTAL & APPROVAL PROCESSMassachusetts Department of Environmental ProtectionDivision of Watershed Management- Watershed Planning Program8 New Bond St., Worcester, MA. 01606 |     |

**Purpose**: To describe the process used by the Massachusetts Department of Environmental Protection (MassDEP), Division of Watershed Management (DWM)-Watershed Planning Program (WPP) to review non-MassDEP monitoring Quality Assurance Project Plans (QAPP), Standard Operating Procedures (SOP), and external data submittals.

**Background:** One of DWM-WPP’s pre-requisites for use of non-MassDEP, external data is successful implementation of an agency-approved Quality Assurance Project Plan (QAPP) for data collection. Non-MassDEP monitoring groups submitting QAPPs to DWM-WPP for review and approval may include, but are not limited to, grant recipients; local, state and/or Federal agencies; tribal nations; environmental consultants; and volunteer monitoring organizations. A QAPP is a planning document for a specific monitoring project or program that describes the planned quality-control elements that help ensure data collected will be of known and documented quality to meet project or program needs. QAPPs often include supporting documentation, such as field and lab SOPs, laboratory Quality Assurance Plans (QAP), and forms. Formal approval of a QAPP and supporting documents is an important first step toward DWM-WPP’s potential use of external data.

Following successful implementation of a QAPP, external data can be submitted to DWM-WPP for potential use in assessing Clean Water Act 305(b) and 303(d) assessment and reporting purposes and developing TMDLs. Data received by DWM-WPP are reviewed for usability (e.g., accuracy, precision, representativeness, and comparability) for MassDEP decision-making. See CN 000.73a – *Guidance Secondary Data Submittal & Review* for more information on the data submittal process.

**When to submit QAPPs**: Monitoring QAPPs can be submitted for review to DWM-WPP at any time. Please allow 30 days for the first review.

**How to submit QAPPs**: QAPPs can be provided to DWM-WPP electronically (MS Word or Adobe pdf formats are preferred). Electronic files can be sent via email or CD-ROM. Hard copies are also acceptable.

Where to submit QAPPs: Electronic QAPP files can be sent via e-mail to any of DWM-WPP’s QA Analyst or grant officer, as applicable. Contact information is provided below. For regular mail delivery of hard copies, data can be sent to the following address:

Massachusetts Department of Environmental Protection

Bureau of Water Resources, Division of Watershed Management, Watershed Planning Program

8 New Bond St., Worcester, MA 01606

Attn: Suzanne Flint

**QAPP Contacts:** MassDEP contacts for submittal of draft QAPPs are provided below. Prior to QAPP submittal, non-MassDEP groups can contact DWM-WPP QA staff and/or MassDEP grant managers to coordinate QAPP distribution, timing, approval duration and other issues.

* Suzanne Flint, 508-767-2789 (QAPP reviews); Suzanne.Flint@mass.gov
* Malcolm Harper, 508-767-2795 (319 grant projects); Malcolm.Harper@mass.gov
* Meghan Selby, 508-767-2893 (604(b) grant projects); Meghan.Selby@mass.gov
* Robert Smith, 617-455-1136 (Water Quality Monitoring Grant program); Robert.F.Smith@mass.gov

**Recommended QAPP content:** QAPPs can be project-based or program-based. While the level of complexity of the project or program monitoring should dictate the amount of detail in the QAPP, all QAPPs should follow a recognized U.S. Environmental Protection Agency (EPA) or other acceptable format and include the following elements.

1. Project Management
2. Data Objectives and Collection
3. Assessment and Oversight
4. Data Validation and Usability

See [www.epa.gov/quality/epa-qar-5-epa-requirements-quality-assurance-project-plans](http://www.epa.gov/quality/epa-qar-5-epa-requirements-quality-assurance-project-plans) for more information on QAPP components, and here for QAPP and SOP development guidance and templates:

* QAPP guidance (MassDEP): <https://www.mass.gov/guides/environmental-monitoring-for-volunteers>
* QAPP guide (inland waters): <https://www.mass.gov/files/documents/2016/08/ti/inlandq.pdf>
* QAPP guide (coastal waters): <https://www.mass.gov/files/documents/2016/10/rm/czm-general-qapp.pdf>
* QA guidance (EPA-Region 1): <https://www.epa.gov/quality/region-1-quality-systems-documents>

**DWM-WPP’s QAPP approval process:** Draft QAPPs, including QAPP addendums, are typically reviewed by DWM-WPP within 30 days of receipt. Review comments are sent to the project manager via letter or email. The QAPP is then revised and re-submitted for approval. The approval process is completed when all signatories have signed the signature page.

MassDEP-approved QAPPs are valid for 1-3 years depending on the nature of the project. Monitoring should not commence until the QAPP is approved.

For projects involving USEPA funding, EPA-Region 1 QA staff review and comment on the draft QAPP concurrently and in coordination with DWM-WPP. In these cases, EPA and DWM-WPP typically provide separate comments within 30 days of submittal. Separate or combined agency comments are sent to the project manager. The QAPP is then revised and re-submitted to both agencies for approvals. A scanned signature page is typically routed sequentially to signatories via email to document the approval.

In some cases, DWM-WPP approves QAPPs that do not include the use of a State-certified laboratory. This is usually based on a careful review of a prospective laboratory’s QAP and SOPs and may include personal communication(s) with the lab supervisor, project lead and others, and a visit to the lab for QC purposes.

QAPP approval by DWM-WPP does not guarantee that data submitted by the non-MassDEP group will be valid and/or usable by DWM-WPP. Poor QAPP implementation, lack of project documentation, disorganized data submittal, incomplete reporting of information, missing quality control data, and project monitoring objectives that are unsuitable for waterbody assessment or TMDL purposes are possible reasons data cannot be used by DWM-WPP for Clean Water Act 305(b) and 303(d) assessment and reporting purposes.

Following approval, any deviations from the approved QAPP- or SOP-procedures should be well documented and reported as part of data submissions. Minor changes to the QAPP within the approval period (e.g., changes in sampling locations from year to year, changes in project personnel, etc.) should be documented in an Addendum and submitted to MassDEP QA staff. Major changes to the QAPP (e.g., changes to the DQOs or analysis laboratory used) require a re-submission and full review and approval of the revised QAPP. Questions about project changes and the appropriate level of documentation should be directed to WPP QA staff.