

**Region 4
U.S. Environmental Protection Agency
Science and Ecosystem Support Division
Athens, Georgia**

OPERATING PROCEDURE


Title: Report Preparation and Distribution

Effective Date: May 22, 2009

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Author

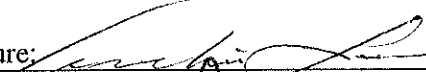
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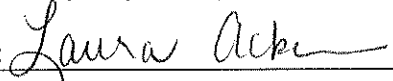
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Revision History

This table shows changes to this controlled document over time. The most recent version is presented in the top row of the table. Previous versions of the document are maintained by the SESD Document Control Coordinator.

History	Effective Date
<p>SESDPROC-003-R3, <i>Report Preparation and Distribution</i>, replaces SESDPROC-003-R2</p> <p>This revision reflects the following changes:</p> <p>Title Page: Replaced Antonio Quinones with Archie Lee as the Chief of the Enforcement and Investigations Branch.</p> <p>General: Some sections were renamed and the order rearranged. Added requirements for transmittal of enforcement confidential reports and information.</p> <p>Revision History and Section 1.3: Changed requirements so that the Document Control Coordinator is responsible for ensuring the most recent version of the procedure is placed on the SESD LAN and for maintaining records of review conducted prior to its issuance. Deleted reference to the H: drive of the SESD local area network.</p> <p>Section 1.4: Added the following references: SESD Review of Field Investigation Reports Form; and, the SESD Technical Review of Provisional Data Form.</p> <p>Section 2.1: Added information to Item #6 on how to manage appendices and attachments. Moved Results of Field Sampling Quality Control Samples from the appropriate list to the required info. Added the last two sentences about the format of reports for SESD customers.</p> <p>Section 2.2: Changed name of Section to Reporting Provisional Data. Added requirements for review of provisional data.</p> <p>Section 3: Renamed to Field Investigation Report Review.</p> <p>Section 4: This section was added to compile subjects that dealt with report approval and distribution. It also provides further clarification on the approval and distribution process.</p>	<p>May 22, 2009</p>
<p>SESDPROC-003-R2, <i>Report Preparation and Distribution</i>, replaces SESDPROC-003-R1</p> <p>This revision reflects the following changes:</p>	<p>November 1, 2007</p>

<p>Title Page: Changed title for Antonio Quinones from Environmental Investigations Branch to Enforcement and Investigations Branch.</p>	
<p>SESDPROC-003-R1, <i>Report Preparation and Distribution</i>, Replaces SESDPROC-003-R0</p> <p>This revision reflects the following changes:</p> <p>Removed all references to SOSA.</p> <p>Cover Page: Author was changed from Donald Hunter to Liza Montalvo due to addition of sections by Liza Montalvo.</p> <p>Section 1.1: Replaced SESD Operating Procedure for Project File Management (SESDPROC-004-R0) with SESD Operating Procedure for Control of Records (SESDPROC-002-R1)</p> <p>Section 1.2: On first sentence, replaced “technical” with “peer review”. Deleted second sentence.</p> <p>Section 1.3: Revised last sentence.</p> <p>Section 1.4: Added the “U.S. EPA Science Policy Council Peer Review Handbook” as a reference.</p> <p>Section 2.1: Renamed. Added other ISO requirements to report content.</p> <p>Sections 2.2, 2.3, 2.4, and 2.5: Re-numbered, re-named, and revised for clarification.</p> <p>Section 3: Renamed. Revised for clarity and completeness.</p> <p>Section 4: Revised for clarity and completeness.</p> <p>Section 5: Renamed and moved to section 2. Revised for clarity and completeness.</p>	<p>September 24, 2007</p>
<p>SESDPROC-003-R0, <i>Report Preparation and Distribution</i>, Original Issue</p>	<p>February 5, 2007</p>

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1 General

1.1 Purpose

The purpose of this procedure is to describe the approach used by SESD to develop reports for a project, to verify the accuracy of information reported, and to determine that the completed work meets the objective(s) agreed upon with the requestor/customer as identified in the project plan or associated records. Employees subject to these requirements may have additional responsibilities outlined in the SESD Operating Procedure for Control of Records (SESDPROC-002).

1.2 Scope/Application

SESD field investigation reports must be developed and reviewed as described in this document. For the purposes of this procedure, a report is defined as a written account prepared to provide specific findings of SESD work. For environmental data collection, a report will describe the results of associated observations, sampling results, measurement results and/or scientific interpretation. In addition, a report will provide specific findings of SESD investigations whether or not environmental data collection is involved (e.g., process descriptions, expert opinions or other work efforts). All findings and results will be reported accurately, clearly, and objectively.

1.3 Documentation/Verification

This procedure was prepared by persons deemed technically competent by SESD management, based on their knowledge, skills and abilities and has been tested in practice and reviewed in print by a subject matter expert. The official copy of this procedure resides on the SESD local area network (LAN). The Document Control Coordinator is responsible for ensuring the most recent version of the procedure is placed on the SESD LAN and for maintaining records of review conducted prior to its issuance.

1.4 References

SESD Operating Procedure for Control of Records (SESDPROC-002, Most Recent Version)

SESD Operating Procedure for Sample and Evidence Management (SESDPROC-005, Most Recent Version)

SESD Review of Field Investigation Reports Form (SESDFORM-018, Most Recent Version)

SESD Technical Review of Provisional Data Form (SESDFORM-029, Most Recent Version)

USEPA Region 4 Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (EISOPQAM), November 2001

U.S. EPA Science Policy Council Peer Review Handbook, Most Recent Version

2 Field Investigation Report Preparation

2.1 Report Content

At a minimum, the following information will be included in all SESD field investigation reports:

1. a title;
2. name and address of SESD and of the location where the field investigation was conducted;
3. the name and address of the requestor;
4. the date and name, position, and signature or equivalent identification of the person(s) that prepared the report and of the Section Chief or designee authorized to approve and release the report;
5. unique identification of the report on each page; (i.e., project identification number [Project ID] from the Region 4 Data Archival and ReTrieval [D.A.R.T.] System);
6. the page number and the total number of pages (i.e., page x of y) on each page; (If appendices and/or attachments are included in the field investigation report, the total number of pages in each appendix and/or attachment will be accounted for by either following the sequential numbering system of the field investigation report or by numbering each appendix and/or attachment separately (i.e., page x of y) and listing each appendix and/or attachment in the Table of Contents, if applicable. The total number of pages of each appendix or attachment will also be indicated. This can be accomplished in many ways. Two examples are to include the information on the Table of Contents or on a title page for each appendix or attachment.);
7. field measurement and/or analytical results, including the appropriate units of measurement;
8. unique sample identification, date, time, location and description of field sampling and/or field measurements conducted, including diagrams and photographs, as appropriate;
9. identification of the organization(s) that performed the field sampling, field measurement activities, and/or laboratory analyses;
10. reference to the SESD operating procedures used during the investigation;
11. identification of the laboratory analytical method(s) used;
12. Results of Field Quality Control Samples;
13. a clear identification of the end of the report (i.e., "End of Report" statement at the end of the report).

Where necessary for the interpretation of the results, field investigation reports will also include the following:

14. identification and explanation of any deviations from, additions to, and/or exclusions from the field sampling or field measurement procedure;

15. information on specific environmental conditions that may have affected a field measurement or sample;
16. where applicable, a statement on the estimated uncertainty of field measurements;
17. where appropriate and needed, opinions and interpretations. Opinions and interpretations will be clearly identified as such and will include a statement which identifies the basis upon which the opinions and interpretations have been made;
18. additional information which may be required by the requestor.

Any supporting information used in the preparation of the field investigation report will be included in the SESD project file.

As appropriate, SESD field investigation reports will contain the following sections based on project objectives, scope and scale:

1. Cover Page
2. Table of Contents, if applicable
3. Introduction
4. Background
5. Summary
6. Discussion
7. Results of Field Quality Control Samples, if applicable
8. Methodology
9. Conclusions
10. References, Attachments, and Appendices, if applicable

Reports written for customers within SESD may be prepared in a simplified manner. The sections listed above should be included as appropriate and as agreed upon between the Project Leader and SESD customer.

2.2 Reporting Provisional Data

Provisional data refers to analytical and field measurement results that may be the subject of revisions until the issuance of a final field investigation report. Provisional data may be provided to the customer prior to the completion of the SESD field investigation report only if:

1. SESD management concurs with the release of the information; and,
2. for analytical results, the results have been transmitted to the Project Leader by SESD's Analytical Support Branch (ASB) for SESD-generated data, and/or the Quality Assurance Section (QAS) for Non-SESD Laboratories, and a technical review of the data has been performed and documented in the SESD project file.

3. for field measurement results, the results have been verified by the Project Leader by conducting a technical review of the data and documenting the review in the SESD project file.

The technical review for 2 and 3 above will include, as applicable: verification of field calibration procedures, verification of transcription of field measurements, and all of the requirements listed in the SESD Technical Review of Provisional Data Form (SESDFORM-029). The completed form will become part of the SESD project file.

For analytical results that have not been transmitted to the Project Leader, SESD management will determine whether the analytical results will be provided to the customer.

Results of analytical and field measurement data that are released prior to report issuance will be transmitted by hard copy with official correspondence (typically a memo). The Project Leader is responsible for ensuring that a copy of this transmittal is included in the SESD project file.

Once SESD management has signed the official correspondence of the hard copy, the results may also be transmitted electronically to the customer. Any electronic transmission must clearly indicate that the results are being submitted prior to completion of the SESD field investigation report and must show the date, the person transmitting the information, and the project identification number. This transmittal must be documented in the SESD project file by the Project Leader.

Email correspondence, correspondence sent by regular mail (such as transmittal memo) and fax cover sheets transmitting enforcement documents should be clearly marked at the beginning of the document with: ****CONFIDENTIAL ENFORCEMENT-RELATED CORRESPONDENCE. DO NOT RELEASE UNDER FOIA****. Adding a confidentiality notice at the end of the email and fax cover sheet is advisable. The confidentiality notice may read:

This message is a confidential communication related to an enforcement matter. It is intended exclusively for the individuals or entities to whom or to which it is addressed. This communication may contain information which is proprietary, privileged, confidential, or otherwise exempt from disclosure. If you are not the named addressee, you are not authorized to print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by email and delete this message. Neither this communication nor any attached document should be released without first consulting an attorney.

2.3 Draft Reports

Draft field investigation reports that have completed the initial internal SESD review process may be transmitted to the customer for review. Transmittal may be accomplished via hard copy, FAX, or electronic transmission. Copies must clearly identify the field investigation report as a draft report. The project leader must document in the SESD project file that the draft report was transmitted and must show the person(s) to whom the report was transmitted. Additionally, the project leader must inform the receiving parties in writing that all electronic and hard copies of the draft field investigation report are no longer valid once they receive the final report. This must also be documented in the SESD project file.

3 Field Investigation Report Review

SESD will conduct an internal review of all field investigation reports prior to transmitting the final report to the customer. The Project Leader is responsible for providing any needed documentation or information to the assigned Reviewer in order to complete the review.

3.1 Compilation of Project Records

Upon completion of a field investigation, the Project Leader will compile all of the necessary project records required to document and support the results of the investigation. This includes the quality assurance project plan, field logbook(s), field checklist(s), Chain of Custody record, Receipt for Samples form, analytical results, and other associated materials, as appropriate (e.g., spreadsheets, computer printouts, strip charts, graphs, narrative tables, references, etc.). The Project Leader is responsible for providing the necessary project records to the assigned Reviewer.

3.2 Internal SESD Review

An internal SESD review consists of an administrative review and a technical review. It is the Project Leader's responsibility to verify, to the best of his/her ability, that all of the information submitted in a field investigation report is correct and meets project objectives.

3.2.1 Administrative Review

An administrative review will be conducted to verify that the information presented in the field investigation report is complete, that it is consistent with the requirements of this operating procedure, and that there are no grammar, spelling, punctuation, or general formatting errors. The administrative reviewer will document the review on the SESD Review of Field Investigation Reports Form (SESDFORM-018). The completed form will become part of the SESD project file.

3.2.2 Technical Review

A technical review will be conducted to ensure that the scientific, technical and/or regulatory interpretations are reasonable, consistent, valid, and meet the objectives of the field investigation. It is a check that environmental data collection activities support the findings and conclusions. Scientific and technical interpretations reported must fall within the range of acceptable opinions that could be generated by knowledgeable individuals in the field of environmental science and engineering, or be supported by sufficient scientific data.

The technical review will be conducted by a qualified SESD field branch staff member that is familiar with the type of measurements and/or sampling being conducted. The Section Chief, in consultation with the Project Leader, will assign a technical reviewer. If possible, the technical review will be conducted by an individual independent of the activity being reviewed.

In order to conduct the technical review, the Reviewer will need to obtain the draft report and the associated project records as described in Section 3.1. The Reviewer is expected to verify a percentage of information/data from the field investigation's project records based on project objectives, scope, and scale. The percentage of information/data to be verified will be determined by the Project Leader and communicated to the Reviewer prior to the review. At a minimum, 10% of the information/data will be reviewed. In any case, it is at the discretion of the Reviewer to verify any and all project record information that s/he considers necessary in order to conduct an appropriate review.

The technical review will include, as appropriate: verification of field calibration procedures, verification of transcription of field measurement data and analytical results, verification of calculations and/or data reductions, review of scientific, technical and/or regulatory interpretations and conclusions, and all of the requirements listed in the technical review section of the SESD Review of Field Investigation Reports Form (SESDFORM-018). The completed form will become part of the SESD project file.

3.2.3 Records of the Review

The Reviewer will summarize his/her findings on the SESD Review of Field Investigation Reports Form (SESDFORM-018). The Reviewer will address any questions directly with the Project Leader. The Project Leader will resolve the problems, and resubmit the data in question for review if necessary. If the Reviewer and the Project Leader cannot resolve any outstanding issues, then the Project Leader and Reviewer will arrange for the Section Chief, their designee, or a staff expert to assist in resolving the issue.

After the review is completed, the Reviewer will return all project records to the Project Leader.

3.3 External Peer Review

An external peer review may be conducted depending on the nature and complexity of the project as determined by the Project Leader and Section Chief. For the purposes of this operating procedure, an external peer review is considered a review conducted by individuals other than the project requestor and/or outside of EPA Region 4.

If an external peer review is deemed appropriate by the Project Leader and/or Section Chief, the review will be conducted in accordance with the guidance presented in the latest edition of the EPA Science Policy Council Peer Review Handbook. Externally reviewed draft reports and comments will be included in the SESD project file.

4 Field Investigation Report Approval and Distribution

4.1 Final Report Approval and Distribution

The final report(s) issued for an investigation will be a hard copy version transmitted by official correspondence (typically a memo). The Project Leader is responsible for ensuring that a copy of the final report(s) and transmittal correspondence is retained in the SESD project file.

Final field investigation reports may also be transmitted electronically to customers at any time after the report has completed the internal SESD review process and all signatures are complete on the approval page. The project leader must document in the SESD project file that the report was transmitted electronically and must show the report recipient(s).

Final reports containing enforcement confidential information should be marked on every page at the top of the document as "ENFORCEMENT CONFIDENTIAL". Email correspondence, correspondence sent by regular mail (such as transmittal memo) and fax cover sheets transmitting enforcement documents should be clearly marked at the beginning of the document with: ****CONFIDENTIAL ENFORCEMENT-RELATED CORRESPONDENCE. DO NOT RELEASE UNDER FOIA****. Adding a confidentiality notice at the end of the email and fax cover sheet is advisable. The confidentiality notice may read:

This message is a confidential communication related to an enforcement matter. It is intended exclusively for the individuals or entities to whom or to which it is addressed. This communication may contain information which is proprietary, privileged, confidential, or otherwise exempt from disclosure. If you are not the named addressee, you are not authorized to print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by email and delete this message. Neither this communication nor any attached document should be released without first consulting an attorney.

Upon completion of the reviews, the Project Leader will transmit the final report to the Section Chief or designee for approval. The Section Chiefs are responsible for ensuring that all reviews are completed, and for approving and authorizing distribution of finalized reports. The Section Chief or designee will distribute the hard copy version of the final report to the customer.

4.2 Amendments or Revisions to Field Investigation Report

If, after the issue of a report, field sampling or measurement results or scientific interpretations are found to be invalid, incorrect, or inaccurate, an amendment or revision to the original report will be issued under the same project identification number. The amendment or revision will be prepared, reviewed, and distributed in accordance with this procedure, clearly identified as an amendment or revision, contain a reference to the original that it replaces, and be included in the SESD project file.

In rare cases, when an amendment or revision is not appropriate and it is necessary to issue a completely new report, this report must be uniquely identified with a new project identification number and must contain a reference to the original that it replaces.

5 Results Obtained from Sources Outside of SESD's Quality System

When field measurements, sampling activities, or laboratory analyses are conducted by sources not covered under the scope of the SESD field branches quality system and are included in SESD field investigation reports, the source of those results will be clearly identified in the report. These organizations may include: SESD's Analytical Support Branch, Contract Laboratory Program (CLP) laboratories, Superfund Technical Assistance and Response Team (START) contactors, States, Regulated Facilities, and other Federal Agencies.