

**Final Report Work Group
Draft Schedule and Assignments to Produce a Consolidated Draft Report
by August 15, 2007**

The Final Report Work Group is tasked with preparing a report that identifies the issues the FACDQ was asked to address, the recommendations the FACDQ developed to resolve those and related issues, and to describe the Committee's process for developing its recommendations. The technical information that underpins the Committee's recommendations will be provided in appendices and in documents that are available through the EPA docket, on CDs or through citations to publicly-available materials.

Decision-making Timeframe

To have a final report for the FACDQ to approve in December requires that major decisions be largely agreed to in June.

This timing will allow members of the Committee who have agreed they want to write the report, to draft sections and consolidate the draft sections into a "draft report"* that members can discuss with constituents between mid-August and mid-September. Members can then bring issues questions and concerns, and reach agreement on final wording on substantive issues and recommendations at the September meeting.

Between September and December, the report will be produced and sent to committee members for final review in advance of the December meeting.

It will not be practical to continue revising recommendations in the report after the September meeting, because the Committee as a whole will not be able to discuss and reach agreement on language before the Committee meets to approve the final report at its December meeting.

Approved Consensus Agreements

Where the Committee has finalized the wording of its recommendations and agreed to the final language by consensus, that consensus language will be inserted into the report as approved. Consensus agreements will not be changed as the report is drafted.

Approach to Writing and Reviewing the Report

The Committee intends to provide information for readers of the report that sets the context for the Committee's work and the recommendations it has developed.

* Given the package nature of the recommendations, Committee members and their constituents will need to see the report as a whole, rather than individual pieces, to get a sense of how the recommendations work together. This will require an aggressive schedule of drafting and review, so sections can be consolidated into a draft report for members to review with constituents before the September 2007 FACDQ meeting.

The *Executive Summary* is expected to be two pages in length, describing the tasks the Committee was given and the recommendations it developed. The primary audience will be the EPA Administrator.

The *body of the report* is also not intended to be lengthy. It will focus attention on context for the committee's work, the important issues it addressed, and the recommendations the Committee developed. At the end of each section of the report, references will be provided to relevant technical documents, for those who want to know the details. In addition to other benefits, a shorter report will facilitate review by constituencies.

The *appendices* to the Committee's report will include documents the Committee produced and references to readily-available documents the Committee used. The Committee will decide which documents to include in the appendices to the report and which to make available on CD or at the EPA website. References to existing, publicly-available documents the Committee used will also be provided.

Audience: The Work Group identified two primary audiences:

- The EPA Administrator, who requested the Committee's product.
- Stakeholders, who have a keen interest in the FACDQ's recommendations and their implementation. This group includes those who have been heavily involved and are familiar with the Committee's process/product, as well as others who have been less involved, but who will care deeply about the outcomes. Enough information about the FACDQ's charge, process and recommendations needs to be provided to meet the needs of both types of stakeholder.

A third audience – the general public – may become interested over time and will need access to information to understand the problem the FACDQ tackled, how the Committee developed its recommendations, and what those recommendations are.

Purpose:

- When EPA initiates rulemaking, it has to explain the rationale for proposed action(s). It would be very helpful if the Committee's report provided detailed rationale for the Committee's recommendations.
- Informing stakeholders about the consensus recommendations and how they were derived will facilitate the rulemaking process.

Content:

- **Executive Summary:** This section assumes the reader will be familiar with the issues and will go right to the package of FACDQ's consensus recommendations. It will lay out how the Committee expects those recommendations to go forward after the Committee's charter ends.
- The **body of the report** will present background to the problem that the FACDQ was chartered to address, the process by which the FACDQ carried out its work and made decisions, and the consensus recommendations that the Committee developed. If the

Committee fails to reach consensus on specific issues, the report will describe the differing perspectives and the rationale behind them. This could be in the form of minority reports.

- The **Appendices** will include consensus documents, as well as other documents that were crucial to the FACDQ's process and recommendations.
- All of the committee's documents, including discussion documents and interim products, will be available at the EPA website/docket.

Format:

- Mary Smith will ask EPA's Dispute Resolution Center to prepare a two-three page document that outlines options for the report, based on reports prepared by other federal advisory committees.

Observations:

- The draft outline is a living document. The proposed content will be revised to reflect the decisions the Committee makes.

Questions for FACDQ Discussion and Direction:

- Should the report itself be a consensus document that everyone agrees to in its entirety? If not, what sections should be consensus documents? What sections do not have to be?
- How long should the report be?
- What is the timeframe and schedule for producing the report?
- Who will write specific sections of the report?

Role of the Final Report Work Group

The Final Report Work Group consists of the following representatives:

- Dave Akers (States)
- Zonetta English (Public Utilities)
- Cary Jackson (Environmental Laboratories)
- Larry LaFleur (Industry)
- Michael Murray (Environmental Community) and
- Mary Smith (EPA)

The Final Report Work Group will be responsible for:

- Proposing a work plan and schedule for drafting the report.
- Taking the lead on drafting specific sections of the report; the lead will call on other committee members to contribute, as appropriate.
- Reviewing draft sections of the report and resolving questions or issues that arise.
- Consolidating the sections into a draft report and determining that the draft report is ready for distribution.
- Authorizing that the draft report be distributed to committee members for constituent review.

Work Plan and Schedule

The Final Report Work Group will develop and present a work plan and schedule for FACDQ consideration and approval at the June Committee meeting. This work plan and schedule will identify who will be responsible for drafting specific sections of the final report.

The schedule will identify milestones between June 8 and August 15 that will result in a consolidated draft report being available for Committee and constituent review by mid-August, 2007.

The Committee will approve the final report in December 2007. To provide adequate time for review of the Committee's recommendations before the work group's September 19-21 meeting and decision-making at that meeting, the Final Report Work Group will distribute a draft report to Committee members for constituent review by mid-August. This will allow members to gather issues, questions and concerns to bring to the September meeting for consideration before the Committee finalizes its recommendations. After the September meeting, the Committee could authorize the Final Report Work Group to make editorial changes that improve the readability of the document, provided the editorial changes do not result in substantive changes to the Committee's recommendations.

The matrix below identifies:

- Sections needed for the August draft (The proposed content for each section is based on the Final Report Table of Contents, reviewed at the December meeting, as updated by the Policy Work Group. The Table of Contents may need to be revised based on subsequent Committee work and decisions).
- Essential information and sources for each section.
- Final Report Work Group members who will take the lead in drafting specific sections of the report, with backup and assistance of other Committee members.

The deadline for draft sections to be sent to the Final Report Work Group will be July 20, which is five weeks after the June meeting. A one-week cushion is included for late drafts to arrive. The schedule gives the Final Report Work Group three weeks to review draft sections, resolve questions and issues that may have arisen, and compile the sections into a consolidated report to distribute to Committee members by August 15.

After receiving the draft report, Committee members will be responsible for timely outreach to their constituents, so the latter have time to review and provide their questions and comments for discussion at the September 19-21, 2007 Committee meeting.

Section of the Report	Needed for Draft? Y/N	Required Information & Source(s)	Work Group Lead and Backup	Status
I. Executive Summary	Y	Charter and Recommendations	Zonetta English (Lead) Cary Jackson (Backup)	
II. Recommended Procedure or Procedures for Detection and Quantitation <ol style="list-style-type: none"> 1. What Do We Need a Procedure to Do? 2. Pool of Procedures, Procedures to Pilot Test, and Final FACDQ Recommended Procedure(s) 3. Recommendations on Data Quality Objectives 4. Recommended Procedure(s) to Address the Following Four Measurement Quality Objectives: <ol style="list-style-type: none"> a) False Positives b) False Negatives c) Accuracy d) Precision 5. FACDQ Recommendations Related to a Procedure Approach <ol style="list-style-type: none"> a) Single Lab b) Multi-Lab c) Inter-Lab 	Y	Committee decisions in June	Larry LaFleur (Lead) Zonette English and Mike Murray (Backup)	
III. Definitions of Detection and Quantitation	Y	Committee decisions in June	Zonetta English (Lead) Cary Jackson (Backup)	

Section of the Report	Needed for Draft? Y/N	Required Information & Source(s)	Work Group Lead and Backup	Status
<p>IV. Uses of the Procedure(s) <i>(based on Policy Work Group revisions of the Uses document, April 19-20)</i></p> <ol style="list-style-type: none"> 1. Lab-Determined Detection Limits (DL_{labS}) and Quantitation Limits (QL_{labS}) 2. Method Promulgation 3. Demonstration of Laboratory Proficiency of Detection and Quantitation Limits 4. Future Updates of Promulgated Analytical Method DLs and QLs 5. A. NPDES Permits and Compliance Uses for QBELs at Concentrations Less Than QL_{nat} B. NPDES Permits and Compliance Uses for QBELs when no QL_{nat} s Exists 6. Matrix Effects 7. Other Uses to Consider 8. Another Issue to Consider: Alternative Test Procedures 9. Implementation of the FACDQ Recommendations 10. Other Issues Not Addressed and Rationale 	Y	Committee decisions in June	Mary Smith (Lead) Dave Akers (Backup)	
<p>V. Additional Implementation Recommendations (To Be Determined)</p> <ol style="list-style-type: none"> 1. For example, Outreach by EPA and Others to Address Regulatory Implications of Recommendations 	?	Committee decisions in June	?	

Section of the Report	Needed for draft? Y/N	Required Information & Source(s)	Work Group Lead and Backup	Status
VI. Recommendations on Other Issues (To Be Determined) 1. For example, Matrix Effects	?	Committee decisions in June	?	
VII. Looking to the Future and Final Observations	Y	Committee decisions in June	Mike Murray (Lead)	
Appendices Purpose of the FACDQ, Members, and Committee Process Procedure(s) Pilot Study Final Report Procedures Report Key Documents on Policy Issues <ul style="list-style-type: none"> • What Do We Need a Procedure to Do? • Uses of Detection and Quantitation Results • Measurement Quality Objectives • Matrix effects • Implementation Key Documents on Technical Issues <ul style="list-style-type: none"> • Pilot Study Design, Results, and Recommendations • Michigan Manufacturers Association (MMA) Data and Evaluation • Issues to Consider When Defining Detection and 	Y	Existing and new materials	Mary Smith (Lead) and EPA staff (Triangle to gather existing materials for other appendices)	

<p>Quantitation – White Paper (John Phillips’ paper, Technical Work Group)</p> <ul style="list-style-type: none"> • Matrix Comparing Detection and Quantitation Procedures • Glossary • Procedures 101 <p><i>Possible additions:</i></p> <ul style="list-style-type: none"> • <i>References for finding Pilot study data and data evaluations from FAC members and CSC</i> 				
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