

**Region 4
U.S. Environmental Protection Agency
Laboratory Services and Applied Science Division
Athens, Georgia**

Operating Procedure

**Title: Field Services Branch Project Data
and Reporting**

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Issuing Authority: Field Services Branch Chief

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Purpose

This SOP is specific to the Region 4 Laboratory Services and Applied Science Division (LSASD) to maintain conformance to technical and quality system requirements. While this SOP may be informative for other organizations, it is not intended for and may not be directly applicable to operations in other organizations. Mention of trade names or vendors does not constitute an endorsement of products or services by USEPA.

Scope/Application

LSASD 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 LSASD 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 LSASD 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. Field Services Branch project data must also be created and stored electronically, to the fullest extent possible, or converted to electronic format prior to archival in the Agency Records Management System.

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Procedural Section

1 Field Services Branch Project Data

1.1 General

All project records generated in association with a Field Services Branch (FSB) field investigation should be created and stored electronically whenever possible. This includes planning documents such as Sampling and Analysis Plans (SAPs) and Field Safety Plans (FSPs), any data collected during the field investigation, data analysis and visualization tools, review documents, and the final report. Refer to the LSASD Standard Operating Procedure for Sample and Evidence Management (LSASDPROC-005) for additional guidance on the management of samples, digital images, and physical evidence.

1.1.1 Electronic Logbooks

Field and laboratory data collected during the course of a project should be recorded digitally, using any of the following options. Electronic logbooks must conform to all applicable requirements described in the LSASD Standard Operating Procedures for Control of Records (LSASDPROC-1001) and Logbooks (LSASDPROC-1002).

- i. ESRI Survey123 (preferred for field data collection)
- ii. Fillable portable document format (PDF) forms
- iii. Spreadsheet or database software

1.1.2 Instrument Data

Data collected using field instruments (*e.g.*, sondes, meters, etc.) that store data internally, and not imported into electronic logbooks, should be downloaded as soon as practicable. If the exported file type is specific to the instrument or manufacturer, meaning that it cannot be viewed without its proprietary software, files should be converted to a widely accessible format (*e.g.*, .xls, .csv, .txt) whenever possible.

1.1.3 GPS Data and Maps

GPS location data collected in the field, and not imported into electronic logbooks, should be downloaded and stored as a spreadsheet or text file. GIS project files, such as those created in ArcMap or Google Earth, can be stored in their original format. However, any maps generated for the project should also be saved as an image file in a widely accessible format.

1.1.4 Digital Photographs

Photographs taken using a digital camera, phone, or tablet, and not imported into electronic logbooks, should be downloaded as soon as practicable. If photos are renamed following download, the original photos with filenames that match logbook entries should also be retained.

1.1.5 Physical Records

Any documents generated or obtained for the project as hard copies should be scanned into PDF format. Large items, such as site maps, may be photographed as one or several images, depending on the scale. Digitized documents should be validated to ensure they are of sufficient quality to replace the original. The original hard copies may then be destroyed once the project has been finalized. However, controlled unclassified information (CUI) or confidential business information (CBI) must be handled according to applicable EPA document control procedures.

1.1.6 Project Correspondence

In accordance with EPA policy, any information pertaining to the project that would be considered a record and that is transmitted via email, text message, or voicemail, must also be stored in the project file. Emails should be printed to PDF, with the full chain of correspondence included. Text messages should be forwarded to an EPA email address, then printed to PDF. Voicemails should be transcribed into electronic format (*e.g.*, Word document or text file), along with relevant information such as date, time, caller, recipient, and phone number.

2 Report Preparation

2.1 Report Content

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

1. Title;
2. Name and address of LSASD and of the location where the field investigation was conducted;
3. Name and address of the requestor;
4. Name, position, and dated electronic 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. Project ID number on each page of the report;
6. Page number and the total number of pages (*i.e.*, page x of y) on each page;
Note: 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.

7. Field measurement and/or analytical results, including the appropriate units of measurement;
8. Unique sample identification number, 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 LSASD operating procedures used during the investigation;
11. Reference to the SAP, Quality Assurance Project Plan (QAPP) or other LSASD planning document that the investigation was based upon;
12. Identification of the laboratory analytical method(s) used;
13. Results of field quality control samples; and
14. A clear identification of the end of the report (e.g., "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:

15. Identification and explanation of any deviations from, additions to, and/or exclusions from the field sampling or field measurement procedure;
16. Identification and explanation of any deviations from, additions to, and/or exclusions from the SAP, QAPP, or other LSASD planning document;
17. Information on specific environmental conditions that may have affected a field measurement or sample;
16. Where requested, a statement on the estimated uncertainty of field measurements;
17. Where appropriate and needed, opinions and interpretations, which will be clearly identified as such, and will include a statement that identifies the basis upon which the opinions and interpretations have been made; and
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 LSASD project file. LSASD field investigation reports will contain the following sections, as applicable based on project objectives, scope and scale, in the suggested order:

1. Cover Page
2. Table of Contents
3. Introduction
4. Summary
5. Site Location and Background
6. Methods
7. Results
8. Discussion

9. Quality Control
10. Conclusions
11. References
12. Appendices

Reports written for customers within LSASD 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 LSASD customer, and specified in project planning document(s).

3 Preliminary Reporting

3.1 Provisional Release of Final Data

Provisional data refers to final analytical and field measurement results that may be subject to further interpretation and/or data assessment by the Project Leader prior to the issuance of a final field investigation report. Provisional final laboratory or measurement data may be provided to the customer prior to the completion of the LSASD field investigation report only if:

1. LSASD management approves the release of the information; and,
2. For analytical data, the results have been released as final from LSASD's Laboratory Support Branch (LSB) for LSASD-generated data, and/or the Quality Assurance Section (QAS) for Non-LSASD Laboratories.

Final provisional data that are released prior to report issuance will be transmitted by electronic or hard copy with official correspondence (typically a memo) from the Section Chief, or their designee. The correspondence will include language cautioning the customer on the use of final provisional laboratory or field measurement data. An example of the appropriate language is as follows:

“Per your request, data for the subject project are attached prior to release of the final report. Provisionally released data are results that have been produced and verified by the laboratory and provided to the Project Leader, but the Project Leader has not completed the data assessment or final report. Additional quality concerns may be identified by the Project Leader during the data assessment which could impact the usability of the data. Distribution of these data outside of the Agency and decision making based on provisionally released data are not recommended until the data assessment and final report have been completed.”

As required for all LSASD reports, the provisional data report will contain a clear identification of the end of the report (i.e., “End of Report” statement at the end of the report).

Once LSASD management has signed the official correspondence, the provisional data report may be transmitted electronically to the customer. Any electronic transmission must show the date, the person transmitting the information, and the project identification number. The transmittal, along with the provisional data report, must be documented in the LSASD project file by the Project Leader.

If the project planning document states the data and information to be reported are considered confidential enforcement related, all email correspondence and correspondence sent by regular mail are clearly marked at the beginning of the document with: ****CONFIDENTIAL ENFORCEMENT-RELATED CORRESPONDENCE. DO NOT RELEASE UNDER FOIA****. A confidentiality notice should be added to the end of any email that accompanies confidential enforcement related information. 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.

For analytical results that have not been finalized and released by the LSASD laboratory or QAS, LSASD management will determine whether the analytical results will be provided to the customer.

3.2 Preliminary Reports

Preliminary field investigation reports that have completed the initial review process may be transmitted to the customer for review. Transmittal should be accomplished via electronic transmission whenever possible, but a hard copy is also acceptable. Copies must clearly identify the field investigation report as a draft report. 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.

4 Field Investigation Report Review

All LSASD field investigation reports will undergo a full review prior to transmitting the final report to the customer. The LSASD review process will consist of an initial review and project record compilation, an editorial and technical review performed by a qualified LSASD FSB staff member who is familiar with the type of measurements and/or sampling being conducted, and an administrative review. The technical and administrative reviews can both be performed by the

same reviewer and may be performed concurrently. If an internal EPA review is required, an additional signature line for that reviewer must be added to the approvals page. It is the Project Leader's responsibility to verify, to the best of their ability, that all information submitted in a field investigation report is correct and meets project objectives.

4.1 Initial Review and Compilation of Project Records

Upon completion of a field investigation, the Project Leader will compile all necessary project records required to document and support the results of the investigation into a shared electronic folder. This includes the draft report as well as planning documents such as the QAPP or SAP, safety plans, any data collected during the field investigation, field logbook(s), field checklist(s), chain of custody records, analytical results, and other associated materials as appropriate (*e.g.*, spreadsheets, graphs, narrative tables, references, etc.). The Project Leader is responsible for providing the Field Investigation Report Review Form (LSASDFORM-018) and necessary project records to the assigned Reviewer.

4.2 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 LSASD FSB staff member who is familiar with the type of measurements and/or sampling being conducted. The Section Chief will assign a technical reviewer. If possible, the technical review will be conducted by an individual independent of the activity being reviewed.

To conduct the technical review, the Reviewer will need to obtain the draft report and the associated project records as described in Section 4.1. 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 all project record information considered necessary 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 LSASD Field Investigation Report Review Form (LSASDFORM-018). The completed form will become part of the LSASD project file.

4.2.1 Records of the Review

The Reviewer will summarize the review findings on the LSASD Field Investigation Report Review Form (LSASDDFORM-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 additional 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. The Reviewer will return all project records to the Project Leader upon completion of the review.

4.2.1.1 Word Documents

Review of Microsoft Word documents should be conducted using the Track Changes feature under the Review menu. This allows edits and comments to be identified by author with a date and time. Reviewed draft documents should be saved for the project file with all tracked changes retained. When generating the final copy, the edited draft can be saved as a new file before accepting or rejecting changes, removing comments, and deleting draft headers, footers and/or watermarks. The Project Leader should evaluate each change suggested by the reviewer before finalizing the report. The final copy can then be converted to PDF.

4.2.1.2 PDF Documents

Review of PDF documents should be conducted using dynamic stamps. This is preferred over the Comment tool, as dynamic stamps are still visible if the file is printed or transmitted. If it is necessary to generate a final copy following review, the reviewed draft can be saved as a new file before removing dynamic stamps and deleting draft headers, footers and/or watermarks.

4.2.1.3 Spreadsheets

Spreadsheets and other data documents can be reviewed using embedded note or comment features of the software, in which the comments are labeled with the Reviewer's name or initials. Any edits to the document should also be indicated in the comments. An updated version of the document or individual worksheet may then be created, if necessary, while retaining a draft copy or individual worksheet with comments preserved.

4.3 Administrative Review

An administrative review will be conducted prior to final approval of the report. This review will verify that the information presented in the field investigation report is complete; that it is consistent with the requirements of this operating procedure, the LSASD quality management system requirements, and any applicable regulations or policies; and that there are no grammar, spelling, punctuation, or general formatting errors. The administrative reviewer will document the review on the LSASD Field Investigation Report Review Form (LSASDFORM-018). The administrative review may be performed in conjunction with the technical review.

4.4 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 and Technology Policy Council Peer Review Handbook. Externally reviewed draft reports and comments will be included in the LSASD project file.

5 Field Investigation Report Approval and Distribution

5.1 Final Report Approval and Distribution

The Section Chief is responsible for ensuring that all reviews are completed, and for approving and authorizing distribution of finalized reports. The final report(s) issued for an investigation will be an electronic copy transmitted by official correspondence (typically email). A hard copy version of the report may also be distributed, as requested. The date of the electronic transmittal and the signature of the transmitter will be documented on the LSASD Field Investigation Report Review Form (LSASDFORM-018). The Project Leader is responsible for ensuring that a copy of the final report(s) and transmittal memo is retained in the LSASD project file.

If the Sampling and Analysis Plan indicated that the data and information to be reported is considered confidential enforcement related, final reports are marked on every page at the top of the document as “ENFORCEMENT CONFIDENTIAL”. Any related email correspondence or correspondence sent by regular mail (such as a transmittal memo) must also be clearly marked at the beginning of the document with: ****CONFIDENTIAL ENFORCEMENT-RELATED CORRESPONDENCE. DO NOT RELEASE UNDER FOIA****. Addition of a confidentiality notice at the end of the email is required. 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.

5.2 Amendments or Revisions to Field Investigation Reports

If, after the issue of a report, an “amendment” or “revision” is required, it will be issued under the same project identification number. The Section Chief will be responsible for determining if the report will require an amendment or a revision. 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 report, include a revision history, and be included in the LSASD project file.

An amendment is a correction of portions of the original report that provides additional clarity and does not impact scientific interpretations or the decision-making process. Amendments will be released at the discretion of the Section Chief and reviewed in accordance with this procedure. Amendments will include a revision history and will be distributed in accordance with this procedure. If a report is amended, the original report will be marked as “superseded” and maintained in the project file. The amendment will be distributed to all original recipients with a cover memorandum indicating the amendment supersedes the original report.

A revision is required if field sampling or measurement results are found to be invalid, incorrect or inaccurate, and have an impact on the scientific interpretations or decision-making process. For a revision, the original will be marked as obsolete and maintained in the project file. The revised report will be distributed to all original recipients with a cover memorandum indicating the revised report supersedes the original. In rare cases, if deemed necessary by the Section Chief, a revision may be issued under a new project identification number and must contain a reference to the original that it replaces.

6 Results Obtained from Sources Outside of LSASD’s Quality System

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

7 Project Files

7.1 General

Upon completion of an FSB project, the Project Leader must assemble project documents for archival purposes. All components of the project file must be stored electronically, according to the procedures detailed in Section 1 above. Additionally, select files must be saved with certain

features or security functions to ensure data integrity and discourage tampering. Refer to Table 1 below for a list of documents that should be included in a project file, as applicable. These documents must be combined and saved as a PDF Portfolio. Any documents generated during a project but not considered a record (*e.g.*, blank logbook templates, travel plans, journal articles, partial drafts, etc.) may be excluded from the project file.

7.1.1 Final Report

The final project report should be saved in PDF/A format. This is a file format specifically used for archival purposes, which allows the document to be self-contained by prohibiting certain features that require external support or linked functionality, and changes the status to read-only. Therefore, the document should not include unconventional fonts or colors, audio or video content, executable functions, or hyperlinks. A file may be converted from PDF to PDF/A by selecting Save As under the File menu, and choosing PDF/A under file type, or by selecting Save As Other and then Archivable PDF (PDF/A). Other PDF or Microsoft Word documents in the project file may also be saved in PDF/A format, at the discretion of the Project Leader.

7.1.2 Spreadsheet Files

Any Excel spreadsheets that contain project data or calculations used to generate final results must be designated as final. This can be done by selecting Info from the File menu, then under the Protect Workbook options, selecting Mark as Final. The spreadsheet will then show a banner across the top indicating it has been marked as final, and the status of the file will become read-only.

7.1.3 Project File Structure

Once all documents have been selected for inclusion in the project file, saved as the appropriate file type, and renamed, they should be compiled together in a single PDF Portfolio. A portfolio can be created in Adobe Acrobat Pro DC, from the Menu, by selecting Create, then PDF Portfolio. This will open a separate window into which one can drag and drop files. The Add Files menu can also be used to browse for files, folders, or other content. Adding folders at this stage will add all folder contents individually, so if certain files are better organized by folder (*e.g.*, photos or instrument data files), it is best to add them after creating the portfolio. This can be done by clicking Create, then right-clicking within the portfolio window. One can then add folders which already contain files, or add a new folder to further organize the portfolio structure. The order of files and folders can also be arranged by dragging them up or down the list. Table 1 outlines a suggested organizational structure for project files within the portfolio.

7.1.4 File Naming Convention

Each individual file within the project file portfolio should include the Project Number at the beginning of the filename. Folders should also include the Project Number, as well as a description of the contents, but it is not necessary to rename all files within those folders, especially if they contain raw instrument data or photos.

Final project file portfolios should be named using the following convention:

Project Number-Project Name-FSB-MMDDYY (final report date)

example: 22-0246-Sample Project-FSB-051022

7.1.5 Storage Location

Project files are stored on the FSB SharePoint site, in folders organized by Section and Fiscal Year. The final project file portfolio is also submitted to the Records Information Manager, and is combined with the associated project file from the Laboratory Services Branch, if applicable, before archival in the Agency Records Management System (ARMS).

Table 1. FSB Project File Contents

Transmittal Memo
Final Report
Project File Checklist
Report Review Form
Draft Report(s)
Supplementary Information or Visual Aids
Statistical Analysis Output
Data Analysis Spreadsheets
Analytical Laboratory Data
Chain-of-Custody Forms
Instrument Data
Photographs
GPS Data and/or Maps
Field Investigation Checklists
Project Correspondence
Field Safety Plan
Dive Plan
Float Plan
Sampling and Analysis Plan
Quality Assurance Project Plan
Project Request Form

8 Definitions

N/A

9 References

LSASD Field Investigation Report Review Form, LSASDFORM-018, Current Version
 LSASD Operating Procedure for Control of Records, LSASDPROC-1001, Current Version
 LSASD Operating Procedure for Logbooks, LSASDPROC-1002, Current Version
 LSASD Operating Procedure for Sample and Evidence Management, LSASDPROC-005, Current Version
 LSASD Technical Review of Provisional Data Form, LSASDFORM-029, Current Version
 U.S. EPA Science and Technology Policy Council Peer Review Handbook, Current Version

10 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 LSASD Quality Assurance Coordinator.

History	Effective Date
<p>FSBPROC-003-R7, <i>Field Services Branch Project Data and Reporting</i>, replaces LSASDPROC-003-R6</p> <p>General: Renamed the document to reflect inclusion of electronic data and project file guidelines. Updated throughout to require using electronic documents whenever possible. Corrected any grammatical errors, updated divisional terms, and added or updated references.</p> <p>Section 1: Added entire section to provide guidance on electronic data collection and storage.</p> <p>Section 2.1: Removed the requirement to list the total number of pages for appendices and attachments, updated the field investigation report structure, and added a provision that the report layout should be agreed upon in the project planning document(s).</p> <p>Section 4: Added the requirement for an external reviewer signature line, if applicable.</p> <p>Section 4.2.1: Added guidelines for performing data and report reviews electronically.</p>	<p>April 5, 2024</p>

<p>Section 7: Added entire section to provide guidance on the compilation of electronic project files and the archival procedure.</p>	
<p>LSASDPROC-003-R6, <i>Report Preparation and Distribution</i>, replaces SESDPROC-003-R5</p> <p>General: Updated format to the new Divisional Format. Renamed based on new Division name. Updated the Division name from SESD to LSASD throughout the document. Removed the use of fax and/or fax cover sheets throughout.</p> <p>Section 3.0: Renamed 3.1 and 3.2 and specified that administrative reviews can be performed by the technical reviewer in conjunction with the technical review.</p> <p>Section 4.1: Specified the report will be transmitted electronically unless a hard copy is requested. Require documentation of the final report transmittal on the Field Investigation Report Review Form.</p>	<p>February 23, 2020</p>
<p>SESDPROC-003-R5, <i>Report Preparation and Distribution</i>, replaces SESDPROC-003-R4</p> <p>General: Corrected any typographical, grammatical, and/or editorial errors. Throughout the document mention of quality system or SESD quality system was replaced with Field Branches Quality System or FBQS.</p> <p>Cover Page: Changed the Author from Liza Montalvo to Bobby Lewis. Changed the Enforcement and Investigations Branch Chief from Danny France to John Deatruck. Changed the Ecological Assessment Branch Chief from John Deatruck to Acting Chief, Laura Ackerman. Changed the FQM from Bobby Lewis to Hunter Johnson.</p> <p>Revision History: Changes were made to reflect the current practice of only including the most recent changes in the revision history.</p> <p>Section 2.2: Omitted requirement for Field Branches technical reviews of provisional data reports. Added language that allows for electronic transfer of a provisional data report to a customer while still providing a mechanism for documentation in the project file. Included language reiterating “End of Report” requirement</p>	<p>October 23, 2014</p>

SESDPROC-003-R4, <i>Report Preparation and Distribution</i> , replaces SESDPROC-003-R3	January 29, 2013
SESDPROC-003-R3, <i>Report Preparation and Distribution</i> , replaces SESDPROC-003-R2	May 22, 2009
SESDPROC-003-R2, <i>Report Preparation and Distribution</i> , replaces SESDPROC-003-R1	November 1, 2007
SESDPROC-003-R1, <i>Report Preparation and Distribution</i> , Replaces SESDPROC-003-R0	September 24, 2007
SESDPROC-003-R0, <i>Report Preparation and Distribution</i> , Original Issue	February 5, 2007