
QA Field Activities Procedure (QAFAP) Across the Agency

Region 6 QA Conference

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Objectives

- Background on Field Operations Group (FOG) and FOG Guidelines
- Overview of the EPA Quality Assurance Field Activities Procedure (QAFAP)
- Implementation Timeline
- Gap Assessments
 - Findings
 - Best Practices
- Next Steps
 - Implementation of Management System
 - Audit Schedule (Internal and External)
- Q&A



EPA Field Work

EPA depends on high quality science to support its decisions for:

- Site clean-ups,
 - civil/criminal enforcement actions,
 - wetland delineations,
 - standards setting, and
 - risk management,
- performed by EPA staff, contractors, grantees and States.



Field Operations Group (FOG)

- FOG is comprised of EPA managers and senior personnel from the EPA Regions, NEIC, and Headquarters, who are responsible for implementing compliance and ambient monitoring field programs.
- Created under EPA's Regional Science and Technology (RS&T) organization.
- Charged with providing leadership and promoting national consistency among the Agency's field activities.
- Promoting collection of reliable and legally defensible environmental data.
- Improving communication between EPA Regions, NEIC, and HQ.



Field Operations Group (FOG)

- FOG established ten (10) **Operational Guidelines for Field Activities**. (*May 18, 2010*)
- Address most critical elements of a field quality management system.
- Documented set of processes and procedures to ensure objectives of the Agency's field activities are met.
- Based on Agency quality-related and **ISO-17025** accreditation requirements.
- RS&T organization endorsed and approved the FOG Guidelines and agreed to implement them.



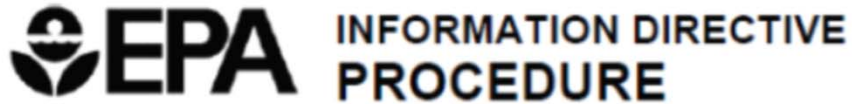
EPA QA Field Activities Procedure

- The FOG Guidelines are incorporated into the EPA QA Field Activities Procedure (QAFAP) under EPA's Quality Policy (CIO 2105-P-02.0). (*September 23, 2014*)
- The Procedure:
 - Describes the scope and applicability of the Guidelines
 - Defines field activities
 - Defines processes needed to implement EPA quality management system requirements for field activities.

<http://intranet.epa.gov/quality/documents/2105-p-02.pdf>



EPA QA Field Activities Procedure



EPA QA Field Activities Procedure	
EPA Classification No.: CIO 2105-P-02.0	CIO Approval Date: 09/23/2014
CIO Transmittal No.: 14-004	Review Date: 09/23/2017

*Issued by the EPA Chief Information Officer,
Pursuant to Delegation 1-19, dated 07/07/2005*

EPA QA Field Activities Procedure

1. PURPOSE

To describe how the Agency quality management system shall be applied to sampling and non-sampling field activities. The procedure provides a comprehensive, coordinated approach for consistent implementation of the EPA Field Operations Group Operational Guidelines for Field Activities (hereafter FOG Guidelines).



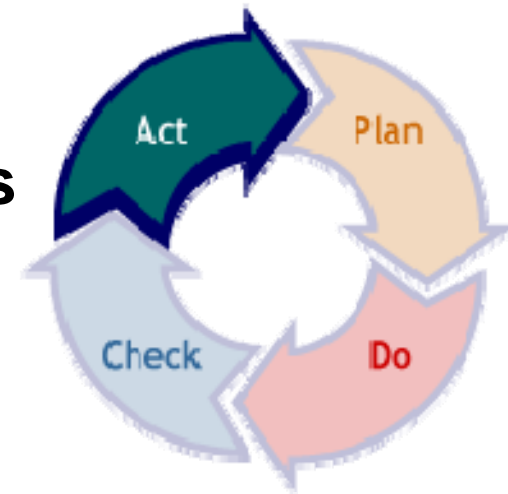
Scope of QA Field Activities Procedure

- Field activities are defined as activities requiring the collection of observations, samples, or data in support of EPA programs, at a site or location.
- Field activities include, but are not limited to:
 - ✓ on-site inspections,
 - ✓ field observations
(including photographs/video)
 - ✓ field measurements,
 - ✓ sample collection, and
 - ✓ field engineering evaluations.



EPA QA Field Activities Procedure

1. Personnel and Training
2. Document Control
3. Records Management
4. Sampling and Environmental Data Management
5. Field Documentation
6. Field Equipment
7. Field Inspections and Investigations
8. Reports
9. Internal Audits
10. Corrective Actions



QA Field Activities Procedure

Benefits

- ***Scientific Data Integrity*** – EPA will produce data that is of known and documented quality based on sound scientific principles.
- ***Proper Evaluation of Internal and External Activities*** – Use of the QA Field Activities Procedure provides documentation of activities and improved oversight for evaluation purposes, thus reducing the potential for errors.



QA Field Activities Procedure

Benefits *(continued)*

- **Reliable and Defensible Decisions** – Using data of known quality strengthens the Agency's ability to reach sound decisions and helps sustain those decisions against future challenges.
- **Burden Reduction** – Through proper planning, resource expenditures can be reduced. Only the correct type, amount, and quality of data will be collected.



Implementation Timeline

- March 2013:** EPA's DA, Perciasepe, directed the Agency to implement the FOG Guidelines.
- September 2014:** FOG Guidelines established as a procedure under the Agency Quality Policy.
- November 2014:** DA Meiburg commits to continue with QAFAP implementation.
- Feb – Sept 2015:** Gap Assessments were performed across the Agency.
- August 2016:** QAFAP Implementation Deadline.
- June 2017:** Internal Audits conducted.
- 2017 and 2018:** External Audits conducted.



Gap Assessments

- Performed between February and September 2015.
- Teams consisted of members of the National FOG Implementation Team, with contract support.
- Conducted Gap Assessments of 15 EPA organizations, including:
 - 10 Regional Offices
 - Office of Enforcement and Compliance Assurance (OECA)
 - Office of Research and Development (ORD)
 - Office of Water (OW)
 - Office of Land and Emergency Management (OLEM)
 - Office of Air and Radiation (OAR)



Gap Assessment Schedule

Organization	FOG Point of Contact(s)	SME(s)	Timeframe
Region 8	Mary Goldade	Liza Montalvo/Kenna Yarbrough	February 23 - 27, 2015
Region 6	Craig Weeks	Kenna Yarbrough/Mary Goldade	March 30 - April 3, 2015
Region 1	Ernie Waterman	Bobby Lewis/Kathleen Foley/Dave Charters/Vincia Holloman	April 13 - 17, 2015
Region 2	John Kushwara	Hunter Johnson/Laura Ackerman	April 27 - May 1, 2015
Region 5	Andy Anderson	Kenna Yarbrough/Liza Montalvo/Kevin Kirby	May 4 - 8, 2015
Region 10	Mark Filippini	Craig Weeks/Trevor Urban	May 11 - 15, 2015
Region 7	Cecila Tapia/John Houlihan/Bob Nichols	Hunter Johnson/Kathleen Foley	June 1 - 5, 2015
Region 9	Vance Fong	Mary Goldade/Mark Filippini	June 15 - 19, 2015
Office of Enforcement and Compliance Assurance (OECA)	Rick Duffy	Liza Montalvo/Laura Ackerman/Dawn Banks	June 22 - 26, 2015
Region 3	Jeanna Henry/Erin Sullivan	Hunter Johnson/Paul James	July 13 - 17, 2015
Office of Research & Development (ORD)	Lora Johnson/Joe Livolsi	Liza Montalvo/Bobby Lewis	July 20 - 24, 2015
Office of Water (OW)	Sarah Lehmann	Craig Weeks/Mary Goldade	July 27 - 31, 2015
Office of Solid Waste & Emergency Response (OSWER)	Stephen Blaze	Bobby Lewis/Laura Ackerman	August 3 - 7, 2015
Region 4	Bobby Lewis/Liza Montalvo	Kenna Yarbrough/Craig Weeks	August 10 - 14, 2015
Office of Air & Radiation (OAR)	Joe Elkins/Greg Noah/Tom Eagles	Bobby Lewis/Craig Weeks/Kenna Yarbrough	August 31 - Sept 4, 2015



Gap Assessments

- The focus of the Gap Assessments was to:
 - Check status of each organization's implementation progress.
 - Provide EPA Senior Management with the status of implementation across the Agency.
 - Provide assistance and recommendations, as needed.
- Assessment Teams consisted of two (2) volunteers from the National FOG Implementation Team (peer assessment) and one (1) contractor.
- Trained over 300 EPA staff on conducting Internal Audits and Corrective Actions.
- Typically 4 – 5 days in duration.



Gap Assessments' Findings

- All organizations are at various stages of implementation.
- Some are farther along than others.
- There are common findings across the Agency concerning:
 - Personnel/Training
 - Document Control
 - Records Management
 - Field Documentation
 - Field Equipment Management



Assessment Findings

Personnel/Training

- Lack of records to ensure that staff performing particular tasks have been properly trained, particularly on-the-job training (OJT) records.
- Lack of records showing staff has been formally evaluated on the ability to perform particular tasks.

Document Control

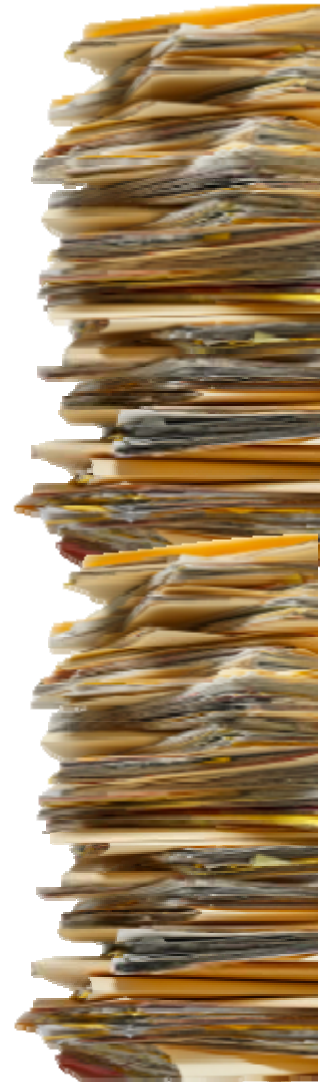
- Lack of or outdated Standard Operating Procedures (SOPs) not in compliance with FOG Operational Guidelines.
- Lack of systems for controlling SOPs.



Assessment Findings *(Continued)*

Records Management

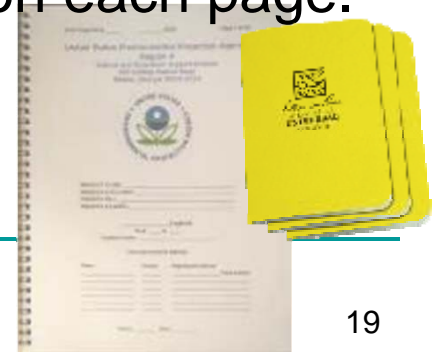
- Records management systems often lack adequate consistency and accountability.
- Lack of understanding of records management requirements, including the definition of Agency records and records retention schedules.
- Some offices did not have a cohesive records center, resulting in inadequate security over Agency records.
- Records are not traceable back to the project.
- Lack of guidance on what information should be included in project/case files.



Assessment Findings *(Continued)*

Field Documentation

- Field activities are not thoroughly documented. Inadequate detail provided in field logbooks.
- Incomplete photo log or no photo log.
- Bound logbooks were not used (loose sheets of paper or checklists).
- Lists of inspection team members and facility participants were not complete.
- Improper error corrections (obliterated, no initial, no date).
- Page numbers and/or dates were not included on each page.
- Original hand-written notes were discarded.
- Dedicated logbooks were not used.



Assessment Findings *(Continued)*

Field Equipment

- No standard operating procedure for the calibration, maintenance, and repair of equipment.
- Inadequate equipment.
- Lack of maintenance and repair records.
- Inadequate calibration records or out of date calibration standards.
- Lack of records for tracking equipment status and sign-in/sign-out records for each project.



Summary of Assessment Findings

- Findings show vulnerabilities that if not corrected may impact integrity of EPA's field work.
- Limited in Scope – not all field programs in each Region have been assessed.
- Assessments were mandatory, however worked with each organization to determine which programs were assessed.
- There are concerns that not all organizations will have fully implemented management systems in place by the August 2016 deadline.



Best Practices



- Use of electronic systems to track and document inspector credentials
- OECA pilot of Talent Management System (TMS)
- Superfund use of the Field Readiness Module in Emergency Response Portal for documenting training
- SharePoint sites and Intranet sites as a repository of controlled documents and/or collaboration tools.
- National FOG Implementation Team SharePoint Site



Best Practices *(Continued)*

- Region 7 – R7@work intranet site
- Development of Report templates and checklists
- Region 6 - UST/Solid Waste Section use of an electronic checklist that combines all information into an inspection report.
- Region 9 - The Enforcement Division engaged the LEAN process to standardize and improve the efficiency of inspection reports and recordkeeping by establishing a report template, peer review process, and self-training videos for the reporting process.



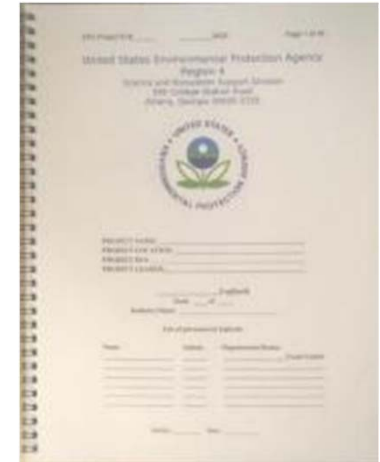
Best Practices *(Continued)*

- Use of Excel Spreadsheets or electronic systems for equipment inventory
- Region 8 has an Excel spreadsheet for equipment inventory.
- Region 6 Superfund field equipment at the Addison warehouse use of Kaizen software as an equipment/asset management system.
- Tech Days for instrument proficiency, SOP Days for reviewing documents, and QA Days for addressing corrective actions.



Region 6 Actions

- Trained over 200 field personnel on new procedures
- Implemented overarching SOPs
- Use of Talent Management System (TMS)
- OJT Training Form
- Document Control internet site
- Binding machine for creating custom bound logbooks
- Created Forms, Checklists, Templates
 - QAPPs, logbooks, reports
- Audits to promote a culture of continuous improvement



Region 6 Documents

United States Environmental Protection Agency

ONE EPA Region 6
Workplace

Region 6 Public Web Site

Social Media    

You are here: [One EPA Workplace](#) » [R6 Workplace](#) » [Information Resources](#) » Field Activities Quality System Procedures

Field Activities Quality System Procedures - Region 6

U.S. EPA, Region 6 has developed the following Field Activities Quality System Procedures in compliance with the [EPA QA Field Activities Procedure, CIO 2105-P-02.0, 09/23/2014](#). These procedures contain routine field standard operating procedures and quality control documents used by Regional field personnel to implement the EPA QA Field Activities Procedure. These processes define a systematic approach and ensure continual improvement in the quality of Agency products and services. Specifically, these procedures describe management system requirements necessary for consistent and scientifically sound field activities used in support of EPA decisions.

These documents are intended to be dynamic and will be periodically reviewed and updated, as needed. It is the responsibility of the user to ensure they are using the most recent version of the procedures.

Regional Specific Field Activity SOPs Links:

1. [Personnel and Training](#)
2. [Document Control](#)
3. [Records Management](#)
4. [Management of Sampling and Environmental Data](#)
5. [Field Documentation](#)
6. [Field Equipment Inventory and Management](#)
7. [Field Inspections and Investigations](#)
8. [Field Activities Report Preparation and Distribution](#)
9. [Internal Audits and Corrective Actions](#)

Regional Field Activity Forms:

1. [On the Job Training Form](#)
2. [Corrective Action Form](#)

Divisional Specific Field Activity SOPs Folders:

1. [Compliance Assurance & Enforcement Division](#)
2. Multimedia Planning and Permitting Division
3. Superfund Division
4. Water Quality Protection Division



Next Steps

- Full implementation of the field activates management system by August 1, 2016.
- Internal Audits of all system components and all field organizations by June 30, 2017.
- Third-party External Audit to assess implementation status in 2017 and 2018.
- OEI will incorporate QAFAP Assessments in their Quality System Assessments.
- FOG will continue its work promoting consistency for the Agencies field operations and providing resources.



Questions?



Contact Information

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