Will Your Grantmaker Project Require a QAPP

WHAT IS A QAPP?

A Quality Assurance Project Plan (QAPP) is a document that is required if your project involves collecting, producing or using environmental data. This includes activities like air monitoring, water sampling, soil testing or analyzing maps using GIS. A QAPP spells out how you will collect data, analyze it and how you will uphold quality assurance in your project. For example, your QAPP might describe how many soil samples you will take over a specific area, and how they will be collected and taken to a lab for analysis.

A QAPP is required for projects that involve:

❖ Collecting environmental data (e.g., air, water, soil samples)

❖ Producing environmental data (e.g., computer models, laboratory analyses)

❖ Evaluating environmental data (e.g., data analysis, interpretation)

❖ Using environmental data in decision-making processes (e.g., regulatory compliance, risk assessment)

❖ Environmental technology projects: Projects that involve the design, construction, operation, or application of environmental technology must also have a QAPP.

EXAMPLE PROJECTS WHERE A QAPP IS NOT REQUIRED

Suggestions for projects that do not appear to meet the definition of a project that would require submission of a QAPP to EPA for review and approval.

❖ **Community-based projects that are educational in nature.** These projects could include disseminating information to the public, including students, residents, and commercial businesses near or affected by a specific environmental condition. The projects are purely communication related, no data collection or technology installed, but focused on informing and/or preventing exposures and raising awareness.

❖ **Redevelopment projects where a structure is remodeled or restored to serve as a functional business or location for housing.** If the project is focused on upgrading a space to make it a healthier environment but does not include any installation of equipment that would be addressing an environmental concern, then a QAPP is not needed.

❖ **Creation of a scenic and/or historic byway or area, where funding will be used to obtain, permit, and receive all necessary approvals for designation.** A QAPP would not be necessary if project activities include planning, document submission, and meetings.

- ❖ **Establishment of food or garden community projects where the food and/or produce are purchased from licensed farming operations for distribution to those in need or where educational programs will be implemented to encourage gardening practices in communities.** They may also include projects to decrease food waste. These efforts do not involve an environmental concern if the food/produce storage areas do not pose any environmental concerns.

- ❖ **Education and awareness raising about the impact of air and water pollution from a nearby chemical plant.** Activities include hosting workshops to teach impacted community members how to navigate state and federal websites and databases, training community leaders on where and how to find air quality data and understand it, and raising awareness about the impact pollution from the chemical plant has in the neighborhood.

- ❖ **Surveys with the goal of gauging public awareness.** This project should not trigger a QAPP as no environmental data is being collected and no environmental decisions are being made.

- ❖ **Hire full-time person to serve as a director and set aside funding for summer internships**

- ❖ **Purchase of testing equipment, e.g., portable turbidity meter**

- ❖ **Capital projects such as land purchase**

EXAMPLE ACTIVITIES THAT WOULD TRIGGER A QAPP

If these activities were added to any of the above example projects, it is likely a QAPP would be triggered.

- ❖ Surveying residents for input on optimal placement of stationary air sensors. If survey results are used to inform environmental decisions, a QAPP is required.

- ❖ Scratch and magnet testing for lead pipes, reporting results. Testing for the presence of lead pipes is environmental data collection.

- ❖ Recently purchased equipment is activated and used for testing. A QAPP is needed if the equipment is used to perform environmental information operations

- ❖ Monitoring indoor and outdoor air quality at a recently redeveloped structure. Air quality monitoring is environmental information operations.

- ❖ Measuring noise levels near scenic and/or historic byway. Noise and light pollution studies would require a QAPP.

A Suggested Approach for Determining if a QAPP Is Necessary:

1. Review the EPA definition of QAPP requirement

   ❖ QAPPs are required for all work performed by or on behalf of EPA involving the collection, production, evaluation, or use of environmental information and the design, construction, operation, or application of environmental technology. A QAPP is a written document that outlines the procedures a monitoring project will use to ensure that samples, data, and subsequent reports are of high enough quality to meet project objectives. The EPA requires all EPA funded monitoring programs to have an approved QAPP before sampling begins.

      ◆ Environmental Information includes data and information that describe environmental processes or conditions

      ◆ Environmental Technology includes systems, devices and their components applicable to both hardware and methods or techniques that measure and/or remove pollutants or contaminants and/or prevent them from entering the environment

      ◆ Specific examples of project activities that would trigger a QAPP include those that

         1. Install solar PV systems, track the energy efficiency gains and calculate impacts to greenhouse gas emissions

         2. Collect air monitoring data for the purpose of assessing air quality

         3. Remove or remediate lead or asbestos in buildings

2. Review the project objective and all tasks to determine if the project will include any of the components that trigger the need for a QAPP

   ❖ If the project does not include collection of data or information, and does not include environmental technology development or implementation, it is not apparent that a QAPP would be required.

3. Document the reason that a QAPP is not required and submit to your Grantmaker for your proposed project for review and approval.

GETTING STARTED ON A QAPP

1. If you have a work plan, either drafted or approved, you have many of the components of a QAPP started.

2. Look closely at all the tasks of your project detailed in the work plan and filter down to the tasks where environmental information or data will be collected or evaluated.

3. From that subset of tasks, bullet out the details of how you will collect and/ analyze that data or information to ensure its quality assurance and quality control. The required components of a QAPP will all need to be included in the QAPP, if they are not applicable, just state why and move to the next element.

4. The QAPP must be approved by EPA prior to data collection.

5. Reach out to available technical resources with questions, the QAPP format may need translation for some projects, so questions are encouraged!

QAPP RESOURCES

❖ EPA IT/IM Directive: Quality Assurance Project Plan Standard, Directive # CIO 2105-S-2.1 – EPA's latest QAPP standard. It includes a description of each required QAPP element.

❖ Guidance for Quality Assurance Project Plans, EPA QA/G-5

❖ Thriving Communities QAPP Template

❖ EPA Training Courses on Quality Assurance and Quality Control Activities