Quality Plan for

Office of Water Policy
and Ecosystems Restoration

Florida Department of Environmental Protection

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Effective Date: 7/15/2025

Signature Page

The undersigned have read and understood this Quality Plan, are charged with managing and improving the quality system, and are responsible for ensuring that all staff properly execute the procedures discussed in the plan.

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Table of Contents

1.0 Introduction

The DEP Quality Assurance (QA) program involves the implementation of a management system (planning, review, training, and assessment) to ensure that data collection, generation, interpretation, reporting, evaluation, and archiving are of sufficient quality to support Department decisions. The effectiveness of our QA program is dependent upon the actions of all DEP staff, from "front line" employees to management, meaning QA is a function distributed throughout our organization. One aspect of our program is to ensure that Department QA activities are carried out according to commitments made to the Environmental Protection Agency as enumerated in the DEP Quality Management Plan (QMP) (Revision 9, April 2020).

The DEP Secretary is committed to implementation of the quality assurance requirements in the QMP and as authorized at Section 403.0623, F.S., and Chapter 62-160, F.A.C. (the DEP QA Rule). It is the Secretary's intent to carry out these obligations and requirements as described in the Department's QA Directive, Directive 972 (Revision 11/1/2016).

To execute the components of the DEP QA Directive, the **Office of Water Policy and Ecosystems Restoration** has developed a quality system. This document describes the steps we take to ensure the scientific and legal defensibility of environmental data we generate or use. It details the process of planning, training, execution, assessment, and corrective action we undertake to ensure that environmental data meets our established quality criteria.

1.1 Basic Elements of Our Quality Plan

Our Quality Plan explains both the process and criteria by which the quality system is managed. The plan is utilized as an instrument of internal communication to inform our staff of current and future quality assurance activities. It discusses how specific QA duties are assigned to responsible staff. We will revise our Quality Plan as needed and will ensure the consistent application of procedures and criteria for the generation or use of our environmental data. The Quality Plan will also be used as a training document for new staff and as a reference for experienced personnel. The plan and its revisions also serve as an archival record of our formal quality system.

The elements of our plan are consistent with the Department's QMP, QA Directive, and QA Rule (Chapter 62-160, F.A.C.). It addresses the requirements of DEP SOP FA 3300. Our plan addresses all activities associated with data review, including those activities associated with database construction and management. Our plan also discusses how decisions about data use are made based on data quality assessments.

Where appropriate, we cite existing internal and external documents, including training manuals, guidance documents, standard operating procedures (SOPs), rules, tables, etc.

We expect all staff to read, understand, and follow the procedures and criteria as discussed in this plan, and to carry out their assigned responsibilities for effective utilization of our quality system. While there is no formal requirement on how often Quality Plans should be updated, this plan is considered a living document and updates are recommended every four years or whenever a major change, such as a reorganization, in the program occurs.

1.2 Policy Statement

It is our unit's policy to:

- Use scientifically valid and legally defensible data for our decisions affecting protection of the environment.
- Have and implement the Quality System described in this document.
- Adaptively manage our Quality System to be consistent with provisions of the DEP QMP.
- Ensure that every individual is properly trained to execute their assigned functions.
- Implement procedures to evaluate the quality of the data we use and to implement corrective actions when data does not meet our Data Quality Objectives (DQOs).
- Periodically audit the performance and record-keeping practices of data generators we have responsibility for.
- Implement quality assurance procedures for the management of our data repositories.
- Perform a yearly systematic assessment of our quality assurance activities, including any corrective actions, with the findings submitted to the Aquatic Ecology and Quality Assurance Section.

1.3 Ethics

All employees of the DEP **Office of Water Policy and Ecosystems Restoration** are held to high professional ethical standards in the performance of their duties. All employees are required to read, understand and sign an 'Ethics Statement' attesting to their commitment to honesty and integrity in performance of their duties. In addition, all employees are required to attend an annual ethics training class. Improper, unethical or illegal actions will be dealt with according to the published Administrative Directives of the Florida Department of Environmental Protection.

2.0 Organization and Responsibilities

The Office of Water Policy and Ecosystems Restoration (OWPER) resides within the Ecosystems Restoration Division**.** The OWPER was reorganized in 2019, combining the former Office of Ecosystem Projects (OEP) and the Office of Water Policy (OWP). Additional staffing reorganization was approved in 2024. The OWPER reports to the Deputy Secretary for Ecosystems Restoration, who also oversees the Office of Resilience and Coastal Protection (ORCP), the Division of Environmental Assessment and Restoration (DEAR), and the Division of Water Restoration Assistance (DWRA).

The function of the **Water Policy** section is to ensure effective implementation of DEP's responsibilities under the Florida Water Resources Act (Chapter 373, F.S.). This section addresses statewide water management issues in conjunction with water management districts and other agencies.

The function of the **Ecosystems Restoration** section is to ensure effective implementation of DEP's policy, programmatic, technical, and regulatory responsibilities under the Everglades Forever Act (EFA), the Comprehensive Everglades Restoration Plan (CERP), the Northern Everglades and Estuaries Protection Program (NEEPP), and other Everglades restoration efforts.

Staff responsibilities are organized into the following program areas:

- Water Policy
- Permitting
- Compliance
- Everglades Funding and Innovative Technologies
- Project Management and Programmatic Support
    - Engineering
    - Biological
- Water Quality and Technical Support

An organizational chart is provided as **Figure 1**.

The Department exercises general supervisory authority over the water management districts (WMDs), which are responsible for the administration of water resources at the regional level. Water Policy works to ensure effective implementation of DEP's responsibilities under the Florida Water Resources Act (Chapter 373, Florida Statutes). Pursuant to Section 373.709, F.S., **Water Policy** staff publish an Annual Status Report on Regional Water Supply Planning, describing each WMDs' progress toward achieving its water resource development objectives. Water Policy staff also publish an annual Florida Water Plan to capture the Department and

WMDs' responsibilities and efforts toward maintaining and improving the state's water resources. Additionally, in fulfillment of Section 403.0675, F.S., Water Policy staff work in coordination with DEAR to publish the statewide annual report (STAR) detailing the status of protection and restoration actions through total maximum daily loads (TMDLs), basin management action plans (BMAPs), minimum flows or minimum water levels (MFLs), and Recovery or Prevention Strategies (RPS).

Permitting staff coordinate the authorization of construction and operations of projects with agency partners (permittees), such as the United States Army Corps of Engineers (USACE) and the South Florida Water Management District (SFWMD), and with Department subject matter experts and technical staff. Permitting staff organize the review of permit application materials to ensure that the construction and/or operations of a project are consistent with Florida law and applicable restoration statutes (e.g., EFA, CERPRA, NEEPP), and that there are sufficient and appropriate reasonable assurances that the project will achieve design objectives and will not contribute to violations of water quality standards or pose a threat to public safety, health or welfare.

Compliance staff facilitate successful and effective implementation of environmental control measures and permit provisions during construction, operation, and maintenance of Everglades restoration projects. Duties include performing field inspections during project construction and conducting regular site visits during routine operations, and tracking and coordinating the review of project deliverables, such as plans, proposals, notifications and reports, to ensure all permit conditions are satisfied.

Everglades Funding and Innovative Technologies staff manage legislative appropriations for restoration activities, and manage grants and contracts awarded by the Department. Duties include coordination of activities associated with funding and disbursement from the SOETF, LATF, CERP, NEEPP and General Revenue funds to the South Florida Water Management District, updating and maintaining tracking databases, and processing and filing of invoicing. Grant managers serve as project managers for technical projects that have been contracted by the Department, particularly in the area of water quality and ecosystem restoration. This includes providing technical assistance to local and state entities in the development of the contracts and scopes of work, compiling, facilitating and completing the internal/external evaluation, review, approvals, and processing of grant agreements which include Quality Assurance Project Plans (QAPPs).

Project Management and Programmatic Support staff, and **Water Quality and Technical Support** staff, assist in planning, permitting and compliance activities. These staff participate in interagency planning discussions and workshops, serve as Department representatives on Project Delivery Teams (PDTs) and other committees or groups, and assist with the technical review of permit application materials and compliance deliverables. This includes engineering

reviews, biological reviews, such as wetland delineation and Uniform Mitigation Assessment Method (UMAM) analyses, and water quality analyses. Staff also provide technical support for activities related to the Department's responsibilities in restoring and preserving the Everglades as required by state law, such as participation in the Everglades Technical Oversight Committee that originated from the 1991 Settlement Agreement. The Water Quality and Technical Support staff are also involved in supporting the program's quality assurance (QA) system and conducting technical reviews of Innovative Technology Grant deliverables including QAPPs.

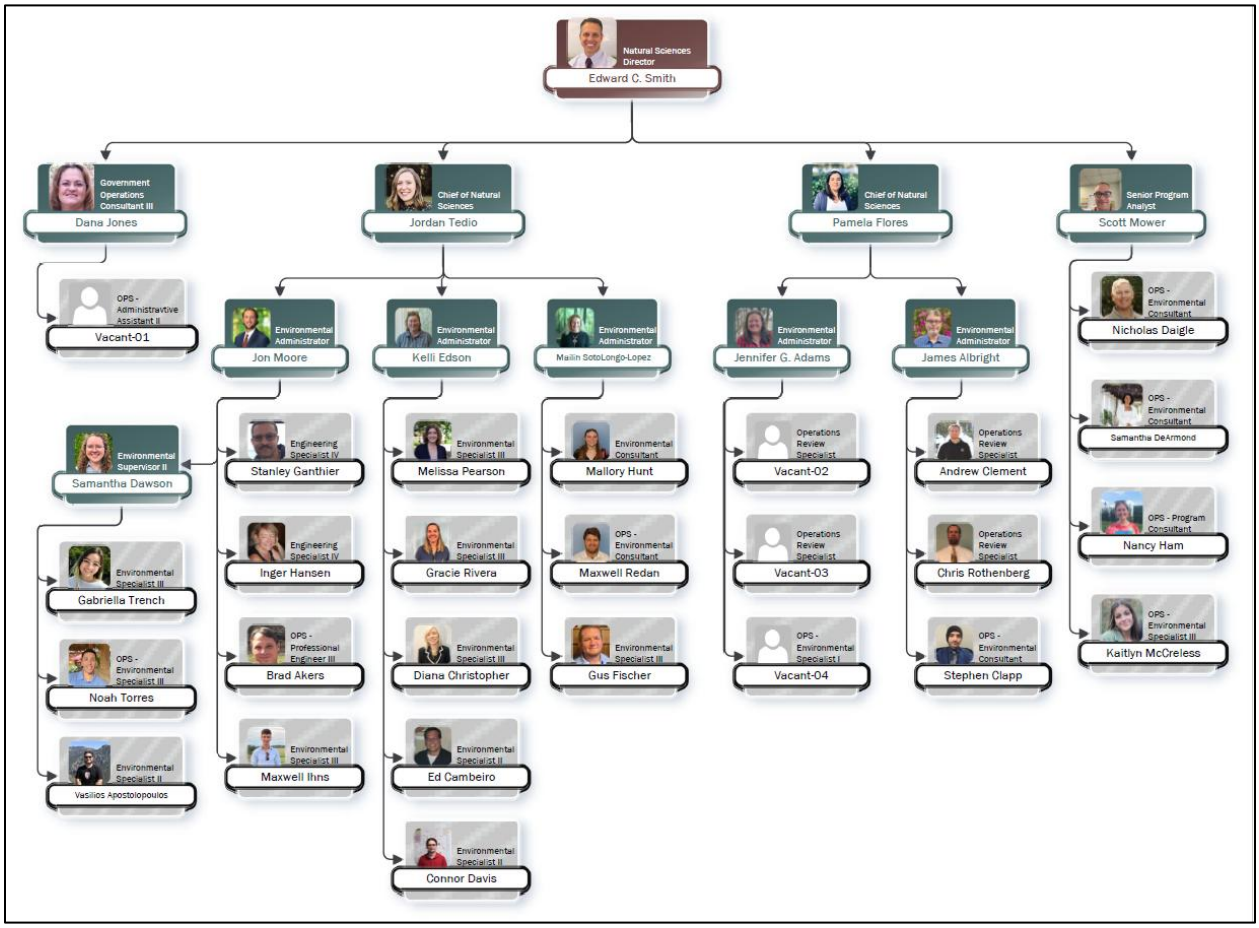

Figure 1. OWPER Organizational Chart (April 2025)

2.1 Quality Assurance Officer

Our Quality Assurance Officer (QAO), **Maxwell Redan,** coordinates and participates in the quality evaluation of program data and provides oversight to ensure that our staff perform their QA functions. The QAO may delegate some responsibilities to properly trained and qualified staff, when appropriate.

As described in the QA Directive, the QAO conducts systems audits of internal and external data generators (lab and field) and conducts sampling performance audits. The QAO also ensures that corrective actions are implemented for data non-conformance incidents as determined by evaluation of the data against our program's DQOs. Additionally, the QAO assists program managers in the development of the Quality System and other logistical aspects of its implementation, such as coordinating associated training needs. Our QAO documents all program QA activities, including training, audits and corrective actions and provides this information to the DEP Aquatic Ecology and Quality Assurance Section (AEQAS) on a periodic basis or as requested.

In general, the QAO acts as a liaison with other units within the Department, data providers, data consumers or other external parties concerning QA matters. The QAO may request assistance from other OWPER technical staff or compliance staff, or from AEQAS staff. All program staff are encouraged to provide feedback to the program QAO for improving the program quality system.

The OWPER Director and Program Administrators ensure that this quality system is fully operational within our program, designates our QAO and provides general oversight. These managers also evaluate our DQOs and Data Quality Indicators to ensure they meet our program's needs and periodically evaluate the effectiveness of staff's data quality activities, including reviewing audit results. These managers, along with compliance staff and the QAO, evaluate corrective action policies and procedures to be implemented when data does not meet program DQOs. Our managers discuss audit results with the QAO, review the annual Quality Assurance Report to the Secretary, and discuss findings or shortcomings of the quality system with the QA Officer.

2.2 Quality Assurance Activities

Our program staff routinely carry out the following duties involving **data usability evaluation and data interpretation**, and the generation of DEP work products in a manner that ensures scientific defensibility and adherence to DEP rules and policies.

- Environmental Data Review (field or lab)
    - Review and approval of Compliance Monitoring Plans (CMPs) that describe the

monitoring and data quality requirements for Department-issued permits.
    - Review of data for usability to determine compliance with permits or rules, including but not limited to field sampling logs, laboratory reports, raw data and summary reports.
    - Development of status and summary reports (e.g., South Florida System Update, Daily Salinity Report, Daily Water Level Report) to be shared regularly with Department leadership and/or external agency representatives.
    - Data analysis to support interagency planning efforts, including the development or evaluation of environmental models and project alternatives, support project permitting, and evaluate Everglades restoration progress.
    - Evaluation of wetlands and other surface waters through the UMAM to determine project impacts and mitigation requirements.
- Contract/Grant/Purchase Order (PO) Management for Environmental Sample Collection and/or Analysis
    - Review and approval of Grant Agreements, Quality Assurance Project Plans (QAPPs), Sampling and Analysis Plans (SAPs) for grants and contracts involving field or laboratory measurements, with assistance from AEQAS.
    - Review and approval of contract and grant deliverables to ensure that monitoring activities were performed consistently with the Department-approved QAPP, and all QA requirements as defined in the grant or contract agreement were met.
- Water Management Data Review
    - Review of WMD budgets to ensure the adequacy of fiscal resources available to the districts and the adequacy of district expenditures.
    - Compile quarterly and annual performance metrics on WMD activities related to four core mission areas – water supply, water quality, natural systems, and flood management – as well as an annual metric for mission support and prepare a summary report.
    - Compile and review WMD data on water resource and water development projects implemented in support of regional water supply plans (RWSP) and recovery and prevention strategies for minimum flows and minimum water levels.
    - Development of annual status reports (e.g., RWSP Annual Report, Statewide Annual Report) to meet statutory requirements.

Occasionally, our program staff carry out duties involving environmental sample collection or measurement, or the observation of these activities. The following are examples of these activities:

- Compliance Evaluation Inspection (CEI) or Compliance Sampling Inspection (CSI) for NPDES permitted facilities (e.g., Everglades Stormwater Treatment Areas).

- Evaluation of the functional assessment categories (Location and Landscape Support, Water Environment, and Community Structure) using the Standardized Field Procedure (SFP) to quantify or verify project impacts and required mitigation.
- Delineation of the extent of wetlands and surface waters

Staff evaluate program data using program DQOs and Data Quality Indicators (DQIs) and implement corrective actions as directed by the QAO. Our DQOs and DQIs are designed to ensure that data submitted to our program meets or exceeds the threshold for scientific defensibility and adhere to DEP rules and policies. A list of our DQOs and DQIs can be found in **Section 4.0**.

3.0 Training

All personnel are properly trained to perform their duties. Supervisors periodically assess whether our staff performance conforms with the policies and procedures of our unit.

Our training procedures include:

- Agency-required training (all staff)
- Job-specific training in all program areas
- Training for specific QA functions, including:
    - Contract/Grant/PO management
    - Permit writing
    - OWPER database management for tracking and processing deliverables
    - Sample collection and processing
    - Field investigation (e.g., wetland delineation, UMAM, vegetation assessments, planning reconnaissance)
    - Field sampling or laboratory audits
    - Environmental data handling, usability, and review
- Refresher trainings or delivery of updated information

Most program-specific job training materials are filed on the OWPER common drive (>>floridadep>>data>>OWPER) and/or the OWPER SharePoint website (https://floridadep.sharepoint.com/ecopro/SitePages/Home.aspx).

OWPER staff involved with data generation, receipt, assessment, storage, and interpretation receive training to execute their assigned functions. Examples of these trainings are included in **Table 1**.

Table 1. QA Trainings for OWPER staff

Training Description	Staff that should receive training
Introduction to DEP's QA System	All staff
DEP Quality Plans	QAO
DEP QA Directive and QA Rule	All staff
DEP SOPs for Sampling and Field Testing	QAO, Technical Support Staff
QA Requirements for Contracts, Grants, POs	**Everglades Funding and Innovative Technologies** Staff, QAO, any staff managing grants/contracts/POs
Evaluating and Interpreting Data	QAO, Technical Support Staff, any staff evaluating data for consistency with DQOs

Additional QA training resources, including video trainings and webinars, are available at https://floridadep.gov/dear/quality-assurance/content/training-presentations. There is also an in-person DEP SOP training available through the University of Florida TREEO Center. Staff should coordinate with their supervisors and the QAO to determine which QA trainings are most appropriate for their job functions.

Other trainings that may be required for technical staff depending on their job responsibilities include:

- UMAM Training Manual. Other training materials are also filed on EVG.
- Wetland Evaluation Training (offered by DEP Submerged Lands and Environmental Resources Coordination Program (SLERC)) (See also training on Chapter 62-340, F.A.C. and Modules)
- "Reviewing Whole Effluent Toxicity Bioassay Reports", filed on the EVG.
- EzDMR User Guide
- DBHYDRO Users Training (in person, or available online)

The QAO shares QA training opportunities with OWPER staff and keeps a record of completed QA training that is reported to AEQAS each year. Additionally, if any OWPER staff have recommendations or requests for QA training opportunities, the QAO will communicate those to AEQAS staff.

4.0 Data Review

Our program understands the need to evaluate the quality and usefulness of environmental data prior to making decisions. We conduct review procedures to **determine the usability of data for determination of compliance with permits, rules, agreements, etc.** These procedures are based on our established DQOs and DQIs, and incorporate the concepts and criteria found in DEP's "Process for Assessing Data Usability", DEP-EA-001/07.

Our DQOs include the following:

- Permittees, grantees, and contractors are required to follow Department Standard Operating Procedures (SOPs) for field and laboratory activities. If DEP SOPs will not be followed, such as for a grant that uses experimental or non-standard methods, alternate field and laboratory procedures must be reviewed and approved by program staff prior to commencement of sampling activities.
- Department-approved analytical methods should be used, and laboratory analyses should be performed by facilities certified by the Florida Department of Health and accredited under the National Environmental Laboratory Accreditation Conference (NELAC) for the appropriate matrix/method/analyte combinations.
- Method Detection Limits (MDLs) and Practical Quantitation Limits (PQLs) for published analytical methods should be equal to or below target MDLs and PQLs established by Subsection 62-4.246, F.A.C. In some cases, alternate MDLs or PQLs may be approved for specific permits or projects, but the reporting limits should always be adequately sensitive to determine regulatory compliance or achieve project objectives.
    - Detection or other reporting levels lower than water quality criteria defined by 62-302, F.A.C. should be achieved. Where this is not possible (e.g., the MDL for chlordane is greater than the Class III freshwater criteria), the laboratory should at a minimum meet the target MDL/PQL established by Subsection 62-4.246, F.A.C.
- Data from laboratories and field organizations should be accompanied by appropriate data qualifier codes, as described in 62-160.700, F.A.C.

Upon receiving data, we review its usability by evaluating key DQIs:

- Was sampling conducted according to the frequencies, procedures, and locations described in the CMP, QAPP, Protocol or another approved sampling plan?
- Were DEP SOPs followed for field and laboratory activities?
- Are appropriate analytical methods used?
- Is the laboratory certified for the appropriate matrix/method/analyte combination?
- Are reporting limits adequately sensitive to determine regulatory compliance and achieve project objectives?
- Are appropriate data qualifiers attached to the data?

If data do not meet our DQOs, data may be rejected. Corrective actions are described in **Section 7.0**.

Program staff may also develop checklists to assist in data review. For example, OWPER technical staff utilize a checklist to review and assess the validity of Whole Effluent Toxicity (WET) tests. An original data report should always be saved and should never be modified. A data reviewer should never edit the original report for purposes of analysis and interpretation, commenting, summarizing, etc. Edits and modifications should only be made to copies of the original submission.

Lastly, technical staff routinely follow established Data Quality Screening Protocols, such as the screening protocol for assessing compliance with the Total Phosphorus (TP) Rule incorporated by reference in 62-302.540, F.A.C.

5.0 Documentation

Standard record-keeping procedures allow us to document OWPER QA activities. Because OWPER staff are generally not involved in data collection or generation, this section discusses our record-keeping procedures for data usability evaluations, data interpretation, corrective actions, audits and inspections, and QA training activities. If OWPER staff participate in sample collection, such as during a CSI for a NPDES permitted facility, FD 1000 for documentation is followed, and DEP forms are used where required or available.

Project-specific documents are stored on the OWPER common drive and organized by program area (e.g., permitting and compliance) or subject (water quality, operations, design plans, etc.). The submission of compliance deliverables is tracked by compliance staff in a Microsoft Access database, which provides a comprehensive inventory of past and future project deliverables and lists the staff responsible for the review of each deliverable. Compliance staff complete job-specific training for maintaining this database.

OWPER staff do not enter environmental data into a database. Instead, data files provided by external data generators like the SFWMD are filed on the common drive in the appropriate project folder. OWPER technical staff also routinely access environmental data that are stored in the Watershed Information Network (WIN), Florida STORET, and DBHYDRO databases. DBHYDRO is maintained by the SFWMD. Quality Assurance and Quality Control (QA/QC) procedures consistent with the DEP QA Rule are performed on environmental data prior to publishing in these databases. Manuals, FAQs and additional information on these databases are available for WIN, STORET and DBHYDRO. Staff can provide feedback to the data generator if they identify questionable data, such as values that exceed physical or chemical measurement constraints (e.g., pH > 14), extreme values (e.g., 25 inches of rainfall in one day), or values that fall outside seasonal or historical norms (e.g., 6 degrees Celsius in July). Points of contact are identified in the database manuals.

OWPER staff also retrieve data for NPDES-permitted facilities from discharge monitoring reports (DMRs) submitted and stored in the Electronic Discharge Monitoring Report System (EzDMR). The DMR has clear instructions for the data generator, including how to report analytical results that are below the method reporting limits and how to report water quality data summaries. These reports are reviewed for data quality and compliance with the permit, and submissions are recorded in the Microsoft Access database.

OWPER policy requires that files are retained for 25 years after completion. Department policy also requires that data generators retain monitoring records for a minimum of five years from the date they are generated, unless otherwise specified (62-160, F.A.C.). All records and documents are public records, unless exempted by Chapter 119, F.S., and may be subject to disclosure per the guidelines and exceptions published in said chapter.

The following are examples of documents or reports related to OWPER QA activities:

- QA Training Tracker
- Raw data submitted by data generators (generally in Excel format)
- Data review checklists
- Surveillance reports (completed during site visits and inspections)
- Project-specific CMPs, QAPPs, SAPs, GWPs, and Protocols
- Corrective Action Reports
- Compliance Deliverable Report (CDR)

6.0 Contract Management

Our program ensures that the DEP contracts that we administer are properly managed to assure appropriate data quality. We attach either the Standard or Research QA Exhibit to any agreement that includes sample collection or analysis and require a QAPP as a deliverable. As such, we conduct the following activities related to contract development and review:

- During project initiation, the grant manager (generally an Everglades Funding and Innovative Technologies staff member) discusses field and laboratory activities with the contractor or grantee to determine if Standard or Research QA requirements apply. The grant manager is responsible for discussing these requirements with the contractor or grantee to ensure they are understood and can be met.
    - The grant manager must coordinate with the QAO and/or AEQAS prior to execution of the agreement to ensure that the appropriate QA requirements are included.
    - If a project does not conform to either the Standard or Research QA

requirements, the grant manager must consult with QAO and/or AEQAS to develop a hybrid or alternative set of QA requirements.

- QAPP and Planning Audits are included in the project deliverables. The appropriate QA attachment is included in the agreement as Exhibit D, and a QAPP template is provided to the grantee or contractor.
    - QAPPs must be reviewed and approved by the Department prior to commencement of sampling.
    - Planning audits are performed by the contractor or grantee and reported to the grant manager to verify that work is being done consistently with the approved QAPP.
    - Other project deliverables are reviewed for consistency with the QA Requirements and approved QAPP.
- DEP may audit contractors and grantees at any time and should consult with AEQAS if an audit is necessary.

7.0 Audits and Corrective Actions

OWPER staff do not regularly conduct formal audits of external data generators.
If program staff discover issues with data quality during data review, they may coordinate with AEQAS to request a field or laboratory audit. Alternatively, they can work directly with the data generator, permittee, or contractor/grantee to resolve data quality issues. Compliance staff should always be included in discussions involving corrective actions. Procedures for implementing corrective actions for QA deficiencies include:

- Clear documentation of the QA deficiencies,
- Meeting(s) with the data generator, permittee, or contractor/grantee to discuss the deficiencies, discuss DEP QA requirements, and develop corrective actions,
- A written description of the corrective actions,
- Follow-up meetings or documents demonstrating that corrective actions were implemented.

The above procedures must be clearly documented and filed in the appropriate location on the OWPER common drive.

OWPER staff conduct Compliance Inspections of the Everglades Stormwater Treatment Areas, which are NPDES-permitted facilities. These Compliance Inspections typically involve a records review of field sampling logs, Chain of Custody (COC) forms, laboratory reports, calibration logs, maintenance reports, etc. The inspector also observes the sample collection, handling, and preservation process for consistency with DEP SOPs, and may collect a split sample to be analyzed by a separate laboratory. Based on the inspection, OWPER Compliance

Staff develop a report that assesses permittee compliance and identifies any deficiencies that require corrective actions.

Audit checklists are available to use as guidance for conducting audits. For NPDES facility inspections, staff must also reference the NPDES Compliance Inspection Manual. OWPER staff should request assistance from AEQAS staff whenever necessary.

Supervisors routinely evaluate implementation of OWPER QA policies by their staff. If QA procedures are not followed, internal corrective actions may include refresher or additional training, or reassignment of job responsibilities. The extent of the corrective action is always evaluated against the seriousness of the non-conformance.

8.0 Report Compilation

To provide the Secretary with information regarding DEP's ongoing QA efforts, our unit describes and compiles the results of all appropriate QA activities and relays it to the Aquatic Ecology and Quality Assurance Section for an annual report.