

Guidance on Data Submissions with and without a Quality Assurance Project plan (QAPP)

Issue: The Listing Policy states that data submitted for development of the 303(d) List must have a QAPP or equivalent documentation. Datasets submitted for the Integrated Report do not always have a QAPP or equivalent documentation. This document provides guidance, supported by the [Listing Policy section 6.1.4](#), on how data with and without QAPPs may be used for the Integrated Report.

Dataset does have a QAPP

This data may be used for all Integrated Report decisions.

Dataset does not have a QAPP

1. If the region would like to use the dataset as primary evidence to support 303(d) listing or delisting decisions, then the region must create a memo on regional board letterhead that explains how all of the bulleted QAPP requirements within the listing Policy have been met by the data provider. The memo will be referenced in CalWQA and assigned to the LOE as the QAPP reference.

The elements which satisfy a QAPP or QAPP equivalent document include:

- Objectives of the study, project, or monitoring program
 - Methods used for sample collection and handling
 - Field and laboratory measurement and analysis
 - Data management, validation, and recordkeeping (including proper chain of custody) procedures
 - Quality assurance and quality control requirements
 - A statement certifying the adequacy of the QAPP (plus name of person certifying the document)¹
 - A description of personnel training
2. If the region would like to use the dataset as ancillary evidence to support 303(d) listing or delisting decisions utilizing the weight of evidence approach (Sections 3.11 and 4.11 of the Listing Policy), then the LOE should be written to identify it as ancillary and include a statement that no QAPP or documentation which satisfies a QAPP was submitted with the dataset and therefore this data is being used as ancillary evidence. An LOE is identified as "Ancillary Line of Evidence" in the LOE Subgroup field of CalWQA.

¹ A regional board Quality Assurance Representative, or other regional board staff with knowledge of QA documentation, may determine that the documents provided with the data submission contain the minimum quality assurance/quality control requirements outlined in the Listing Policy (section 6.1.4). If the regional board cannot provide staff to review documents, then the State Board QA Officer may review the documents.

Regional QA Representatives

Region 1: Rich Fadness

Region 2:

Region 3:

Region 4:

Region 5:

Region 6: Dr. Bruce Warden

Region 7:

Region 8:

Region 9:

Document Review RE: Elements Required by Listing Policy for Use of Data in Listing and Delisting Actions

Regional Water Quality Control Board: Lahontan Regional Water Quality Control Board

Parent Project Name of Data: Truckee River Water Quality Monitoring Plan

CalWQA Reference Number for Data: 4390

The Listing Policy requires that the following elements must be available in documentation for data used as primary evidence for 303(d) listing and delisting actions ([Listing Policy section 6.1.4](#)):

- Objectives of the study, project, or monitoring program
- Methods used for sample collection and handling
- Field and laboratory measurement and analysis
- Data management, validation, and recordkeeping (including proper chain of custody) procedures
- Quality assurance and quality control requirements
- A statement certifying the adequacy of the QAPP (plus name of person certifying the document)²
- A description of personnel training

I have determined that the elements required by the Listing Policy have been met by documentation submitted in support of (Parent Project Name). The data may be used in 303(d) listing and delisting actions.

Bruce T. Warden

Signature

Bruce T. Warden, Ph.D.

Print name

June 15, 2018

Date

²A regional board Quality Assurance Representative, or other regional board staff with knowledge of QA documentation, may determine that the documents provided with the data submission contain the minimum quality assurance/quality control requirements outlined in the Listing Policy (section 6.1.4). If the regional board cannot provide staff to review documents, then the State Board QA Officer may review the documents.