June 2025

Summary of Changes to the Brownfields Program QAPP Guidance

The EPA Region 1 Brownfields Program QAPP Guidance has been updated to reflect the current QAPP requirements document, the EPA QAPP Standard (CIO 2105-S-02). The updated guidance contains helpful information that **can improve the efficiency of QAPP reviews and approvals**. Generic QAPPs and site-specific QAPP Addenda that were written and approved under the previous Brownfields Program QAPP Guidance (2009) do not need to be revised based on the updated Guidance. However, we recommend that you review the content of the guidance for future work.

Please reach out to Jim Byrne (byrne.james@epa.gov) or Daniella Feistritzer (feistritzer.daniella@epa.gov) for questions about the Brownfields Program. Reach out to the EPA Region 1 QA Branch (R1QAPPs@epa.gov) for QA-related questions.

Summary of key changes:

- Added references to the EPA QAPP Standard (CIO 2105-S-02) and the EPA Region 1 QAPP Program Guidance.
- New terminology is included to reflect terminology used in the QAPP Standard.
  - "environmental data" is now referred to as "environmental information"
  - "data collection" is now referred to as "environmental information operations"
  - "RFA number" is now "QA tracking number" or "QA#"
- QAPP roles and responsibilities:
  - A senior manager must be identified
  - Project QA manager independence is emphasized, including requirement for direct line of communication to senior manager.
- Submittal for review and approval by the EPA:
  - QAPPs are submitted to a general inbox, R1QAPPs@epa.gov, for EPA QA Branch Review. EPA project manager must be cc'd.
  - Timeline for submitting QAPPs was updated from 30 days to **60 days before planned start of fieldwork**.
  - All expedited review requests (i.e., <30 days) must be requested through the EPA PM
  - Annual Generic QAPP reviews should be documented and available to the EPA QA Branch if requested.
  - If there are new or updated field or laboratory SOPs copies of the SOPs should be submitted to the EPA during the annual Generic QAPP review.
  - The process for QAPP modifications is described.
- Includes new **guidance on minor revisions** and factors that make a QAPP "good" which can help improve efficiency of EPA QAPP review and approval.
- Appendices A and B were combined into a single appendix. Generic QAPP and site-specific QAPP Addendum contents were updated to reflect QAPP Standard and EPA Region 1 requirements:
  - **Section A:** Title must include "QAPP"; Generic QAPP title should include state(s) the Generic QAPP applies to; site-specific QAPP Addendum title page must include the EPA grant number.
  - **Section B:** Include a senior manager; project QA manager has independent line of communication to senior manager
  - **Section D:** Including project data quality indicators is now explicitly stated
  - **Section F:** Describe how quality of supplies and services is addressed and documented; supply acceptance must be on items or traceable to items
  - **Section G:** Identify person responsible for updating SOPs
  - **Section J:** Include process to ensure lab accreditation and certification for analyses
  - **Section O:** Identify person responsible for assessments and oversight; person must be free of conflicts of interest; indicate timeframe for responding to corrective actions
- Appendix B now provides example tables for specific sections.