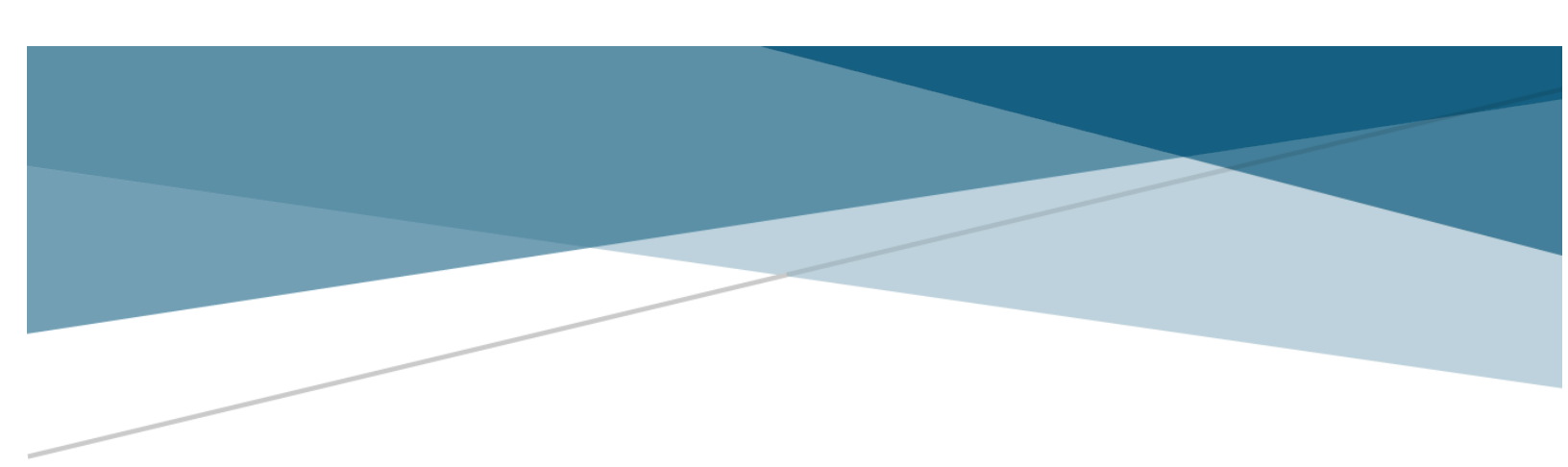




Connecticut Department of Energy & Environmental Protection Quality Management Plan 2026-2031

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CT DEEP QMP Approvals

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1. ACRONYMS AND ABBREVIATIONS

BAM Bureau of Air Management

CAA Clean Air Act

CWA Clean Water Act

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

DAS Department of Administrative Services

DEEP Department of Energy and Environmental Protection

EI Environmental Information

EIO Environmental Information Operations

EPA Environmental Protection Agency

FIFRA Federal Insecticide, Fungicide, and Rodenticide Act

IM Information Management

IT Information Technology

FY Fiscal Year

MMCA Materials Management and Compliance Assurance

QA Quality Assurance

QA# EPA Region 1 QA Tracking Number

QC Quality Control

QAM Quality Assurance Manager

QAPP Quality Assurance Project Plan

QMP Quality Management Plan

RCRA Resource Conservation and Recovery Act

RFP Request for Proposal

SAP Sampling and Analysis Plan

2. AUDIENCE

This EPA Region 1 Quality Management Plan Guidance is intended for external, non-EPA organizations who are required to have an EPA-approved QMP according to the terms and conditions of the extramural agreement with EPA Region 1.

3. INTRODUCTION

3.1 BACKGROUND AND PURPOSE

All EPA and non-EPA organizations performing environmental information operations are required to participate in the EPA Agency-wide quality program by adhering to applicable EPA quality directives, including the Quality Management Plan (QMP) Standard ([CIO 2105-S-01.1](#)).

The QMP is an organization-level document that describes DEEP's structure, policies, procedures, and commitment to quality assurance associated with all EPA-funded environmental operations or programs managed by DEEP. This system includes Quality Assurance Project Plans (QAPPs), which are specific to the policies and procedures associated with a particular project or program.

3.2 QMP STANDARD AND QA/R-2 COMPARISON

The QMP Standard defines minimum requirements for QMPs prepared by and for the EPA. In February 2023, the QMP Standard replaced the longstanding Requirements for Quality Management Plans that previously had been provided by EPA Requirements for Quality Management Plans ([QA/R-2](#)). For more information and to access the most current versions of all Agency-wide QA Directives visit epa.gov/quality.

Terminology

The QMP Standard adopted new terminology consistent with the 2024 EPA Environmental Information Quality Policy ([CIO 2105.4](#)) and Environmental Information Quality Procedure ([CIO 2105-P-01.4](#)). Most notable is use of the terms “environmental information” (EI) and “environmental information operations” (EIO). EI is largely synonymous with environmental data but is meant to include data that cannot be measured, such as maps, models, software, or other environmental technology tools. EIO is a collective term for the collection,

production, evaluation or use of environmental information; it also includes the design, construction, operation or application of environmental technology.

Throughout this guidance “environmental information/EI” is used interchangeably with “environmental data” and “environmental information operations/EIO” with “environmental operations.”

Format and Content

QA/R-2 and the QMP Standard both identify elements that are required to document an organization’s quality program. However, the new QMP Standard contains 18 elements compared to QA/R-2’s 10 elements, though many of the requirements are similar. DEEP’s 2020-2025 Quality Management Plan followed QA/R-2 with 10 elements. Specific content requirements for each QMP Standard element are described in Section 4 to be in conformance with EPA’s most recent QMP guidance.

3.3 ROLES AND RESPONSIBILITIES

The development, review, and approval of QMPs is a cooperative process between DEEP, the EPA Region 1 program office, and the EPA Region 1 QA Branch.

DEEP is responsible for developing a QMP as well as reviewing the existing QMP to ensure it accurately reflects the organization’s decentralized quality program. All EPA-funded environmental programs and activities conducted by DEEP are included. QMPs are required to be reviewed and revised as necessary at least every five years. QMPs can remain valid for up to five years if there are no major changes to the terms and conditions of the agreement or to the scope of programs and activities defined in the QMP. QMPs are also required to be reviewed annually and documented in DEEP’s Quality Assurance annual report.

EPA Region 1 Program Office

The environmental programs or operations managed by DEEP support one or more EPA Region 1 program offices. The EPA Region 1 program works with the EPA Region 1 QA Branch and DEEP to ensure the QMP is up-to-date and within its five-year approval window.

EPA Region 1 QA Branch

The EPA Region 1 QA Branch is responsible for reviewing and approving QMPs. The QA reviewer may be the regional QA manager or designee.

4. QMP STANDARD REQUIREMENTS

The QMP Standard includes 18 elements that pertain to various aspects of DEEP's quality program. These elements describe how DEEP manages its environmental programs and activities, including Element 1 (the Title Page), and Element 2 (the Approval Page). This section will begin with Element 3 (DEEP's Quality Statement).

3. DEEP'S QUALITY STATEMENT

Purpose: The quality statement affirms DEEP's commitment to quality management principles, practices, and resource allocation for the quality program.

The Connecticut Department of Energy and Environmental Protection (DEEP) is charged with conserving, improving, and protecting the natural resources and the environment of the state of Connecticut as well as making cheaper, cleaner, and more reliable energy available for the people and businesses of the state. The agency is also committed to playing a positive role in rebuilding Connecticut's economy and creating jobs – and to fostering a sustainable and prosperous economic future for the state.

DEEP's ongoing commitment to quality assurance ensures that all environmental data collected, generated, and processed is scientifically valid, of known precision and accuracy, representative for the intended purpose, and comparable to similar data collections and analyses. The data and information collected is used as a basis for making decisions such as establishing quality standards, emissions limitations, permit limits, and management plans.

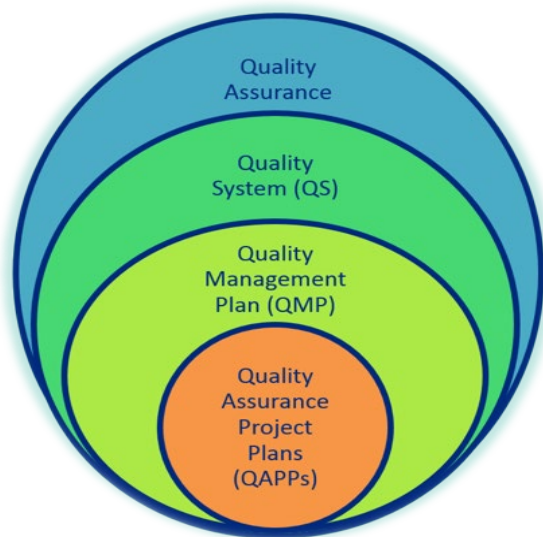
DEEP's Quality Management Plan (QMP) provides guidance to agency staff when establishing and maintaining consistent and appropriate quality assurance, quality control, and quality improvement for environmental data collections and analyses. DEEP developed the QMP as a means of documenting how it will plan, implement, and assess the effectiveness of quality assurance and quality control operations as applied to environmental programs funded by the United States Environmental Protection Agency (EPA). Staff involved with environmental data operations for EPA-funded programs shall be familiar with and consult the QMP and conform their activities to its guidance.

Management and staff in the Environmental Quality Branch Bureaus of Air Management (BAM), Materials Management and Compliance Assurance (MMCA), and Water Protection and Land Reuse (WPLR) have the primary responsibility and authority for ensuring that projects within their bureaus that require QAPPs have such plans developed and approved by EPA that are managed in accordance with those plans. Bureau managers and staff also have the primary responsibility and authority for ensuring that other aspects of DEEP's

Quality System, which is the framework for planning, implementing, and assessing DEEP's work, are managed in accordance with DEEP's approved Quality Management Plan.

DEEP's ongoing commitment to quality assurance is consistent with its policy Directive issued in 2009 regarding Quality Assurance that includes references to EPA and DEEP's first Quality Management Plan. As stated in the Directive (Appendix A), DEEP's quality assurance policy maintains that all environmental data collected, generated, and processed is scientifically valid; of known precision and accuracy; sufficiently complete and representative for the intended purpose; comparable to data collections and analyses similar in scope and purpose; and legally defensible, as may be necessary for the intended purpose. The data and information used as a basis for environmental program decisions, *i.e.*, establishing environmental quality standards, emissions limitations, permit limits and resource management plans, shall be in a form that may be clearly and understandably presented to the public.

DEEP's Quality Assurance Team, consisting of a Quality Assurance Manager and Quality Assurance Coordinator, is responsible for conducting the annual Quality Systems Review, updating the Quality Management Plan, maintaining DEEP's quality assurance online resources, and attending and/or assisting with EPA Region 1 All State Roundtable meetings. Each Bureau has staff that conduct field work in compliance with the Clean Water Act; Clean Air Act; Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA); Resource Conservation and Recovery Act (RCRA); and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as well as with many other federal and state laws and regulations. The QAM and Coordinator function in these roles on a part-time basis.



This graphic indicates the components of DEEP's Quality Assurance program.

4. ORGANIZATIONAL CHART

Purpose: The organizational chart identifies the environmental programs and operations to which DEEP's QMP applies and the managers and staff involved. It also documents lines of authority for management and staff.

DEEP has been described as a "super agency" because its mandate includes responsibilities that in other states are often handled by multiple agencies. The agency's basic organizational structure reflects its scope of duties. An organizational chart of DEEP's basic structure, reproduced from DEEP's public website, is included in Appendix B.

DEEP has three main branches, Environmental Quality, Environmental Conservation, and Energy. The Environmental Quality Branch includes the Bureaus of Air Management, Materials Management and Compliance Assurance, and Water Protection and Land Reuse represented in this Quality Management Plan. Branches are led by appointed Deputy Commissioners who report to the Commissioner. Each Bureau, in turn, is headed up by a Bureau Chief and consists of multiple divisions managed by division directors. The typical division consists of multiple programs or similar subunits, each with its own supervisor and staff. Most divisions also include one or more assistant directors or equivalent positions; as the name implies, assistant directors typically report to division directors, but there is much variation as to where they fit into the organization.

In addition to the three main branches, DEEP's organizational structure includes the Office of the Commissioner, which includes the Deputy Commissioners of Environmental Quality, Environmental Conservation, and Energy, as well as the Chief of Legal, Planning & Regulatory Affairs, which is the direct supervisor for the Office of Environmental Review and Strategic Initiatives (ERSI) alongside several other independent Offices within the Office of the Commissioner. ERSI is tasked with general oversight of Quality Assurance.

Information on DEEP's organization is found at DEEP's Human Resources Division: [current organizational chart for DEEP](#).

5. ROLES, RESPONSIBILITIES, AND AUTHORITIES

Purpose: This section identifies the roles and describes the responsibilities and authorities of the individuals responsible for the quality program.

DEEP established a decentralized Quality System prior to 2002 to meet EPA's Quality System requirements. Similar to the scope covered by a Quality Management Plan, a Quality System provides the framework for planning, implementing, documenting, and assessing the work performed by DEEP as it carries out its quality assurance (QA) and quality control (QC) activities. Because of its decentralized nature, DEEP places primary emphasis on the

program and project delivery levels where staff prepare and review Quality Assurance Project Plans (QAPPs) and submit these to EPA for review and approval.

QA Manager

The QA Manager (QAM) is the Director of the Office of Environmental Review and Strategic Initiatives (ERSI).

The QA Manager assists in updating DEEP leadership in the Quality Systems program and works with the QA Coordinator with staff communications, training, and new EPA requirements.

As illustrated in Appendix B: the Organizational Chart, the Office of Environmental Review and Strategic Initiatives (ERSI) is within the Office of the Commissioner. The Office of the Commissioner is separate and distinct from the Branch of Environmental Quality where environmental data is collected. This interdisciplinary office is uniquely suited to coordinate quality assurance due to the emphasis on planning, cross-division coordination, finance, information management, information technology, and human resources.

Staff in ERSI are assigned to assist the QAM and QA Coordinator when needed. The QAM is independent from the Bureaus involved in data collection, as shown in the organizational chart. Due to DEEP's decentralized Quality Assurance program, the QAM does not oversee specific QAPPs or the programs that maintain QAPPs.

DEEP's QAM and QA Coordinator conduct Quality Assessments on an as-needed basis. The QAM remains independent of the environmental information covered in the QMP and remains impartial and unbiased.

The QAM reports to the Chief of Legal, Planning, and Regulatory Affairs. Although the Chief of Legal, Planning, and Regulatory Affairs directly supervises the QAM, the QAM has the authority to access and discuss quality-related issues with their organization's senior manager outside of their direct supervisory chain as necessary.

QA Coordinator

The QA Coordinator is a senior Environmental Analyst in ERSI.

The QA Coordinator's role is to update management plans, conduct annual training on Quality Assurance, attend New England Region 1 Quality Assurance meetings, assist in organization of QAPP database, and provide training materials to the Bureaus within the agency.

The QA Coordinator is independent from the bureaus that run their QA programs. The QA Coordinator does not have the authority to sign QA documents for the QAM. The coordinator's role is to facilitate updates to management plans, communicate with staff on training needs and on updating the QAPP inventory table, conduct annual assessments of the Quality Management Plan and report to EPA, attend New England Quality Assurance meetings, assist in the organization of DEEP's QAPP database, and share training materials to the bureaus within the agency.

Project Managers

Within DEEP's three main branches, Environmental Quality, Environmental Conservation, and Energy, there are several Bureaus headed by Bureau Chiefs and Division Directors. Within each Division, Environmental Analysts are typically the Project Managers for their Quality Assurance Project Plans. Project Managers are responsible for creating, implementing, reviewing, and training others on their QAPPs.

Project Managers for individual environmental data projects are responsible for identifying and adhering to any necessary special training or certification requirements associated with a project subject to EPA's Quality System requirements. The required format for a standard Quality Assurance Project Plan includes a specific element within the "Project Management" section named called "Special Training/Certification" which should be used to document any such needs. The Quality Assurance contacts in each bureau are responsible for maintaining QAPPs and discussing changes and updates with their staff.

6. TECHNICAL ACTIVITIES AND PROGRAMS SUPPORTED BY THE QMP

Purpose: This section identifies and describes all environmental programs or operations covered by the QMP. As required by the QMP Standard, this section corresponds to Element 4, the Organizational Chart.

The Quality Management Plan applies to DEEP's Environmental Quality branch. DEEP has three main branches represented in the Organizational Chart Appendix A. Environmental Quality, Environmental Conservation, and Energy. The Environmental Quality Branch includes the Bureaus of Air Management (BAM), Materials Management and Compliance Assurance (MMCA), and Water Protection and Land Reuse (WPLR). The Environmental Conservation Branch includes the Bureaus of Natural Resources and Outdoor Recreation. The Energy Branch includes the Bureau of Energy Technology and Policy (BETP). Branches are led by appointed Deputy Commissioners who report to the Commissioner. Each Bureau, in turn, is headed up by a Bureau Chief and consists of multiple divisions managed by division directors. The typical division consists of multiple

programs or similar subunits, each with its own supervisor and staff. Most divisions also include one or more assistant directors or equivalent positions; as the name implies, assistant directors typically report to division directors, but there is much variation as to where they fit into the organization.

In addition to the three main branches, DEEP's organizational structure includes an Office of the Commissioner, which consists of the Offices of Legal, Planning, and Regulatory Affairs. These offices provide administrative management, staff assistance, and ancillary service to aid the Commissioner and Bureau Chiefs in their efforts to carry out the mission of the agency. The Office of the Commissioner hosts the Office of Legal Counsel, Adjudications, Planning and Partnerships where the Office of Environmental Review and Strategic Initiatives (ERSI) reside. ERSI is tasked with general oversight of DEEP's Quality Assurance efforts.

Table showing all programs conducting environmental information operations:

DEEP Bureau	DEEP Division	Programs
Air Management (BAM)	Planning and Standards Division	Particulate Monitoring, Criteria Gas Monitoring, Black Carbon, Meteorology
Materials Management & Compliance Assurance (MMCA)	Water Planning & Enforcement	Industrial Permitting & Enforcement, Field Compliance
Materials Management and Compliance Assurance (MMCA)	Engineering & Enforcement	Pesticide Program
Materials Management & Compliance Assurance (MMCA)	Emergency Response & Spill Prevention	Leaking Underground Storage Tank Program
Water Protection & Land Reuse (WPLR)	Planning & Management	Monitoring & Assessment, Long Island Sound, Municipal Water Pollution, Watershed Mgt.
Water Protection & Land Reuse (WPLR)	Remediation	CERCLA pre-remedial

Water Protection & Land Reuse (WPLR)	Land & Water Resources	Technical/ Coastal Resources
Water Protection & Land Reuse	Long Island Sound Partnership and DEEP Fisheries Division	Long Island Sound Program utilizing the Marine Fisheries program

The Bureau of Air Management's work on EPA-funded programs is authorized under the Clean Air Act which involves sampling and analysis of particulate matter, gaseous criteria air pollutants, black carbon, and meteorological parameters.

The Bureau of Materials Management and Compliance Assurance's work on EPA-funded programs is authorized under the Federal Insecticide, Fungicide, and Rodenticide Act, Energy Policy Act of 2005, and Clean Water Act which involves compliance, enforcement, monitoring, and permitting associated with pesticides, leaking underground storage tanks, and NPDES.

The Bureau of Water Protection and Land Reuse's work on EPA-funded programs is authorized under the Clean Water Act which involves monitoring and assessment of Long Island Sound, water quality, and acoustic telemetry.

The EPA-funded programs described above integrate QA through planning, implementation of work processes, assessment and response, and quality improvement. Planning documents how individual data operations will be planned to ensure data collected is of the needed and expected quality for the desired use. Implementation involves the documentation on how work processes will be implemented, utilizing standard operating procedures or within Quality Assurance Project Plans. Assessments document how the programs determine suitability and effectiveness of the quality system that's being implemented. Quality improvement involves documenting what improvements can be implemented as part of DEEP's commitment to continual improvement in its quality assurance system.

7. CONFORMANCE WITH POLICIES, PROCEDURES, STANDARDS, AND REGULATIONS

Purpose: This section states the policies, procedures, standards, and regulations that apply to the quality program.

EPA Policies and Standards:

The current Environmental Information Quality Policy ([CIO 2105.4](#)) - provides the policy and requirements for preparation and implementation of the EPA's quality program.

The current Environmental Information Quality Procedure ([CIO 2105-P-01.4](#)) establishes management responsibilities for ensuring that EPA environmental information operations, products and services meet Agency quality-related requirements.

The current Quality Management Plan Standard ([CIO 2105-S-01.1](#)) - defines the minimum requirements for QMPs.

The current Quality Assurance Project Plan Standard ([CIO 2105-S-02.1](#)) - defines the minimum requirements for QAPPs.

DEEP follows all quality-related terms and conditions and requirements specified in extramural agreements with the EPA.

DEEP follows the current Quality Management Plan Standard. Quality Assurance Program Documents are found on the landing page, EPA's Region 1 Quality Systems Documents. This page includes links to guidance on Quality Management Plan framework, completion checklist, QAPP template and instructions, as well as other guidance and instructional documents for reference. Connecticut follows the Reasonable Confidence Protocols.

Relevant guidance documents are found on EPA's Region 1 Quality Systems Documents. Guidance is offered for the Quality Management Plan, Quality Assurance Project Plans, Field Implementation, Assessment and Data Review, and Planning and Guidance Resources.

8. QA FIELD ACTIVITIES

Purpose: This section documents DEEP's quality management practices to ensure consistent implementation of field activities.

Among the various bureaus in DEEP conducting QAPPs, staff conduct a variety of field activities. Staff conduct sampling and analysis, enforcement, review field and laboratory procedures, monitoring, telemetry, modeling, Lidar and multispectral imaging, acoustic monitoring, and field compliance. Each Project Manager of a QAPP has a procedure to provide training to staff, documented in the individual QAPP or in a Division's SOP. Training may include the management and control of field samples, note taking, observations, and dissemination.

9. COMPUTER HARDWARE AND SOFTWARE

Purpose: This section documents how DEEP meets anti-piracy standards.

The general management and oversight of computer hardware and software resources within DEEP is shaped by a set of policies and procedures specific to DEEP, additional state government policies and procedures, and corresponding organizational structures and authorities. Software used by DEEP will be appropriately licensed, approved for use, and will not be pirated. If hardware, software, or other IT services will be delivered to EPA by DEEP, it will meet EPA IT Standards. Sub-awardees will use software that is appropriately licensed, approved for use, and not pirated.

The Department of Administrative Services, Bureau of Information Technology Solutions (BITS), is Connecticut's lead state entity that provides quality information technology (IT) services and solutions to state agencies. BITS, also in its capacity as lead IT agency for the state, has authority for the purchase of IT equipment and services by executive branch agencies. All proposed computer hardware and software purchases originating within the agency must be reviewed and approved by BITS. No software can be downloaded without some form of administrative privileges. DAS BITS requires an application form and supervisory approval for any requested software.

10. INFORMATION QUALITY GUIDELINES

(NOT APPLICABLE) *for EPA organizations only, does not apply to this QMP. This is left as a placeholder for the QMP Standard Crosswalk.*

11. ORGANIZATIONAL COMPETENCE

Purpose: This section describes the training requirements for the quality program and environmental programs or operations at DEEP.

The Department of Administrative Services (DAS) is the lead state agency for all personnel-related policies and procedures. Within DEEP, the Human Resources Division within the Bureau of Central Services is the lead office for personnel-related policies and procedures. DEEP, as an executive branch state agency, must adhere to an extensive set of laws, regulations, and other policies and procedures that control the hiring, ongoing employment, and promotion of its employees.

All executive branch employees have standardized job titles (often referred to as class titles or positions) and all job titles have associated Job Descriptions. DAS develops and publishes these generic Job Descriptions for all classified positions within the executive branch. The descriptions include "Example of Duties," and "Minimum Qualifications Required." Job Descriptions for similar groups of classes are periodically reviewed.

Annual performance reviews are conducted on all staff by their supervisors and reviewed and signed by their bureau chief.

12. PERSONNEL TRAINING

Purpose: This section describes the training requirements for the quality program and environmental programs or operations in your organization.

Project Managers for individual environmental data projects are responsible for identifying and adhering to any necessary special training or certification requirements associated with a project subject to EPA's Quality System requirements. The required format for a standard Quality Assurance Project Plan includes a specific element within the "Project Management" section named called "Special Training/Certification" which should be used to document any such needs. ERSI provides training on the current Quality Management Plan and a training video located in DEEP's training video library.

As an agency, DEEP issued a 2008 directive related to training, accessed through DEEP's intranet in Manual Code 5541.

The policy reads as follows:

POLICY: The Department is committed to employ and retain talented staff by supporting and providing meaningful on-the-job and other training opportunities so employees may continuously improve their performance and contribute to the agency's mission of protecting the environment and conserving natural resources. To accomplish this goal, the Department's Human Resources Division, in conjunction with the Office of Affirmative Action, has developed a comprehensive staff and organization development program.

The directive also indicates the following:

- Supervisors and employees are encouraged to work together to design the most appropriate training plans for the individuals' job duties, skills, abilities, and career goals.
- Managers and supervisors are encouraged to support employees' attendance and on-the-job application of both mandatory and elective training relating to their primary job responsibilities, logical career progressions, upward mobility, lateral, or other opportunities, job enrichment, legal requirements, or certification or licensure maintenance requirements.
- Employees are strongly encouraged to take personal responsibility for their own education, training, and career growth through active participation in various development opportunities both within and outside the Department, including financing some of the programs themselves.

- At a minimum, supervisors and managers are strongly encouraged to discuss employees' staff development issues during required annual performance appraisal reviews per current agency procedures and collective bargaining agreements.
- Within one week of receiving proof of completion of training, employees should submit copies of their certificates of completion or other attendance documents to DEEP Human Resources for inclusion in their personnel files, computer databases, and their bureau/office training contacts' records, if applicable.

13. PROCUREMENT OF ITEMS AND SERVICES

Purpose: This section documents the procedures for ensuring the quality of procured items and services meets the needs of your organization and its environmental programs.

DEEP, as an executive branch state agency, must adhere to an extensive set of laws, regulations, and other policies and procedures in any situation where it intends to pay another party to deliver a product or perform some kind of service. Objectives behind these practices are intended to encourage open and fair competition, safeguard the state's financial resources, eliminate any opportunity for favoritism, and promote certain government policies.

Procedures for the procurement of items and services can be divided into three basic categories:

- The purchase of any kind of information technology (IT) equipment and service, including procurements that require Requests for Proposals (RFPs) or procurements that require negotiating and approving a contract. Authority for the purchase of IT equipment and services by executive branch agencies resides with the Bureau of Information Technology Solutions (BITS).
- The purchase of all other standard goods and services (typically referred to as "buying off contract," meaning the ability to take advantage of an existing state contract).
- The procurement of one-of-a-kind, non-IT-related items and services. Such procurement may require an RFP. It may require approving a contract or similar document. Included in this category are grants awarded by DEEP and formal agreements between DEEP and other state agencies and other government entities that involve funding originating with DEEP.

The authority for the procurement of standard goods and services lies with the Purchasing Unit, part of the Bureau of Central Services. The Purchasing Unit processes all approved

agency purchase requests. Additional authority for the procurement of IT-related goods and services exists within the Office of Information Management.

The authority for processing contracts and grants issued by DEEP lies with the Financial Management Division of the Bureau of Central Services. As with purchase requisitions, individual program staff draft contract details. The draft contract language is approved by a division director or designee and then processed by the Financial Management Division. All contracts, regardless of the dollar amount, must be reviewed and signed by the Commissioner or appropriate Deputy Commissioner. All contracts are subject to some level of review by other state agencies.

Responses to solicitations typically take the form of vendor responses to bid solicitations (RFPs) or responses to grant announcements. Requests for Proposals (RFPs) must state the general criteria to be used to evaluate bid responses and should include all relevant technical and quality requirements. In cases when an RFP is used for procurement, a committee is formed for the purpose of reviewing the responses and making an award recommendation, using written score sheets with entries that correspond to the evaluation criteria.

DEEP's Bureaus follow the guidance for QAPP development provided by EPA. Project Managers for individual environmental data projects are responsible for identifying and adhering to any necessary special requirements for purchased items or services associated with a project subject to EPA's Quality System requirements. If DEEP utilizes a contractor or subgrantee and they create a QAPP, the project manager will coordinate the QAPP approval process.

14. DOCUMENT AND RECORD PROCESS

Purpose: This section describes your organization's policies and procedures to effectively manage and control quality-related documents and records

DEEP, as an executive branch state agency, must adhere to a set of laws, regulations, and other policies and procedures that control how it manages documents and records, both paper and electronic. The Office of the Public Records Administrator, part of the Connecticut State Library, is the lead state agency for all policies and procedures related to public records.

DEEP manages its public records through its Records Retention program and several Records Retention directives. DEEP's Records Retention Program directive includes the agency's basic Records Retention policy, which states the following: "In accordance with the Connecticut General Statutes 11-8 and 11-8a, employees of the Department of

Environmental Protection may not destroy any public record without prior approval from the Office of the Public Records Administrator."

DEEP has a designated Records Management Liaison Officer (RMLO) located in OIM and approximately two dozen "Sub RMLOs" representing all major agency programs or divisions, who function as liaisons between their units and the agency RMLO. In addition to the primary Records Retention Program directive, several other relevant directives exist:

- Access to the DEEP Records Center located at 79 Elm Street, Hartford, CT
- Photocopying DEEP records from bureaus/programs in the DEP Records Center
- Purging Records Prior to Filing and Storage.

The "DEEP Records Center," mentioned above, is a facility managed by OIM that houses many types of DEEP records and makes them available to the public and DEEP staff in a secure environment. While the records stored at the Records Center are mostly paper documents at the present time, DEEP has begun the ambitious initiative of electronically scanning the contents and making the documents available to the public and DEEP staff through an automated Document Management System.

For Environmental projects covered under QAPPs, project managers for individual environmental data projects are responsible for managing QAPPS and all other documents and records associated with individual environmental data projects. The required format for a standard QAPP includes a specific element within the "Project Management" section called "Documents and Records," which should be used to document how such materials should be managed.

15. PLAN, DO, CHECK, ACT, QUALITY MODEL

15a. Plan

Purpose: This subsection documents how an organization uses a systematic planning process to ensure the results of environmental operations and activities are of known and documented quality and suitable for their intended use.

EPA strongly promotes that thorough planning should precede any project that acquires, generates, compiles, or uses environmental data. The results of this planning should be documented accurately and completely in a Quality Assurance Project Plan (QAPP), which must then be reviewed and approved by EPA New England QA before the project begins. QAPPS are approved for five years or the grant period whichever is shorter. The processes documented in any approved QAPP must be followed once the project is underway and all QAPPS must be reviewed annually and revised as necessary to reflect any changing conditions related to the project. Relevant EPA websites and individual documents are

referenced in different sections of this plan. Relevant guidance documents are found on [EPA's Region 1 Quality Systems Documents](#). Guidance is offered for the Quality Management Plan, Quality Assurance Project Plans, Field Implementation, Assessment and Data Review, and Planning and Guidance Resources.

- [Environmental Information Quality Procedure \(pdf\)](#) (424.72 KB)
This procedure establishes management principles and responsibilities for ensuring that Environmental Protection Agency environmental information and technology operations products and services meet agency quality-related requirements, are of sufficient quality for their intended use, and support EPA's mission to protect human health and the environment.
- [Quality Assurance Project Plan \(QAPP\) Standard \(pdf\)](#) (523.25 KB)
This Standard replaces EPA/QA-R5, "EPA Requirements for Quality Assurance Project Plan" and defines the minimum requirements for QAPPs for EPA and non-EPA organizations performing environmental information operations.
- [Quality Management Plan \(QMP\) Standard \(pdf\)](#) (508.88 KB)
This Standard defines the minimum requirements for QMPs for all EPA and non-EPA organizations performing environmental information operations.

Project Managers for individual environmental data projects are responsible for conducting the necessary planning for projects subject to EPA's Quality System requirements and documenting the results of the planning in a Quality Assurance Project Plan. Each environmental program has an assigned delegate from EPA Region 1 to review and approve QAPPs. The graded approach is applied by the divisions and reflects the complexity of the work. The level of the project will follow the graded approach. More complex projects will require greater documentation.

15b. Do

Purpose: This subsection describes how work processes are implemented to ensure that environmental data are of the needed and expected quality for their desired use.

At DEEP, individual groups may develop and use SOPs as needed to support specific Quality Assurance Project Plans. Within the standard QAPP format, the "Data Generation and Acquisition" section documents SOPs and methods. Project managers determine whether an SOP is required and oversee the review process. Technical staff may prepare draft SOPs, which are peer reviewed, approved by supervisors, and saved in SharePoint for use by division staff. Project managers may revise or rescind SOPs when needed and communicate changes to staff.

For example, the Bureau of Water Protection and Land Reuse uses SOPs extensively for training staff in permit programs and for operating SIMS, the agency-wide permit tracking system.

For quality assurance, WPLR has developed SOPs for key monitoring efforts, such as the Long Island Sound Ambient Water Quality Monitoring Program. This SOP describes the purpose of the program, how samples are collected, the associated laboratory procedures, and the equipment and supplies required. When updates are made, the revised SOP is signed by the bureau's QA coordinator and the staff involved in the project. If a Quality Assurance Project Plan (QAPP) does not rely on a separate SOP, the required procedures are incorporated directly into the QAPP. Each program is responsible for maintaining QAPPs and conducting self-assessments.

In the air monitoring program, SOPs and QAPPs are submitted annually to EPA Region 1 by November 1. SOPs are drafted by lead writers, peer reviewed by multiple groups, and then approved by a supervisor before finalization.

15c. Check

Purpose: This subsection documents how the organization determines the suitability and effectiveness of its quality program and the performance of environmental programs or operations.

DEEP units consult with QAPPs to comply with any stated reviews and assessments to ensure data quality and compliance with quality assurance standards.

Since 2008, EPA NE QA has conducted periodic assessments of DEEP's Quality Systems every three to five years. CT DEEP complies with the Quality System requirements from EPA to provide the following information in an annual quality systems status report: assessments conducted by or for DEEP's Quality System, areas for improvement including quality program recommendations, Quality Management Plan annual updates, including when it was reviewed and revisions made, and a QAPP inventory list.

15d. Act

Purpose: This subsection describes how corrective actions are documented, implemented and assessed for effectiveness.

Project Managers overseeing individual environmental data projects hold primary responsibility for identifying and addressing project-specific data quality issues, as well as recognizing opportunities to improve related processes and activities. QAPPs serve as a foundation for documenting required assessments, ensuring that quality issues are systematically identified and tracked.

Upon identification, Project Managers are expected to implement timely and effective corrective actions to resolve data quality concerns, while also initiating process improvements that prevent recurrence. In addition, they are accountable for updating the QAPP whenever project changes necessitate revisions, to stay aligned with the goals and objectives.

This structured approach reinforces a cycle of continual improvement, ensuring that environmental data projects not only meet established quality standards but also that any changes or actions needed are handled by the subject matter experts.

16. DISPUTE RESOLUTION PROCESS

Purpose: This section describes how quality assurance disputes are managed and resolved.

DEEP attempts to resolve quality assurance issues at the lowest management level possible. This includes both quality management and technical quality assurance disputes. All parties should attempt to resolve disputes through discussion and negotiation. If agreement cannot be reached at a lower level of management, then the issue will be resolved by senior management.

17. CONTINUAL IMPROVEMENT

Purpose: This section documents how your organization continually seeks to improve its quality program.

DEEP's Bureaus, BAM, WPLR, and MMCA, have each designated Quality Assurance Contacts to oversee QMP compliance within their respective bureaus. DEEP's Quality Assurance Coordinator works with these contacts to maintain the QAPP Table and Annual Reports.

To strengthen regional collaboration, the Quality Assurance Manager and Quality Assurance Coordinator actively participate in biannual New England Region 1 Roundtable meetings with EPA, sharing lessons learned and integrating best practices. Each year, the annual Quality Systems Report builds upon prior initiatives, expanding the scope of improvement efforts and documenting measurable progress.

DEEP's ERSI team has advanced awareness of the QA program by implementing new communication strategies through TEAMS and continues to enhance the program by maintaining open channels of communication from the Commissioner's Office to QAPP managers. In support of ongoing staff development, ERSI also maintains a Quality Assurance Training video, available internally in DEEP's Video Library, ensuring that training resources remain accessible and up to date.

18. DATA REVIEW, VALIDATION, AND VERIFICATION AND DATA USABILITY REPORTING

Purpose: This section addresses how the organization reviews data and information to confirm project and quality objectives were met.

Data review and data usability are required components of QAPPs and will be addressed in those planning documents as they are updated (if necessary), reviewed, and approved by EPA.

Appendix A: Manual Code 3130 D1 Quality Assurance Policy Directive

MANUAL CODE: 3130
D1

Department of Energy and Environmental Protection

Public Act 11-80, effective July 1, 2011, established the Department of Energy and Environmental Protection as the successor agency to the Department of Environmental Protection, the Department of Public Utility Control, and the energy group within the Office of Policy and Management.

DIRECTIVE

SUBJECT: Quality Assurance Policy

PURPOSE: The mission of the Department of Environmental Protection (DEEP) is to preserve and enhance the environment for all of Connecticut's people. It is important to the success of our mission that staff use consistent and appropriate practices for data collection and analysis to provide a firm base for environmental program decisions. This directive informs staff of the standard of quality for environmental program data collection and use and provides guidance on appropriate actions to meet this standard.

POLICY: DEEP's quality assurance policy maintains that all environmental data collected, generated and processed is scientifically valid; of known precision and accuracy; sufficiently complete and representative for the intended purpose; comparable to data collections and analyses similar in scope and purpose; and legally defensible, as may be necessary for the intended purpose. The data and information used as a basis for environmental program decisions, i.e., establishing environmental quality standards, emissions limitations, permit limits and resource management plans, shall be in a form that may be clearly and understandably presented to the public, including but not limited to, plans and guidance.

PROCEDURE:

1. Quality Management Plan.

In 2008, DEP adopted the current *Quality Management Plan (QMP)* to provide guidance to agency staff when establishing and maintaining consistent and appropriate quality assurance, quality control and quality improvement for environmental data collection and analysis. DEP developed the QMP as a means of documenting how it will plan, implement and assess the effectiveness of quality assurance and quality control operations as applied to environmental programs funded by the United States Environmental Protection Agency (EPA). Staff involved with environmental data operations for EPA-funded programs shall be familiar with and consult the QMP and conform their activities to its guidance. The [QMP](#) is available on DEEP's website.

2. Bureau Quality Assurance Management Lead.

The Air Management, Materials Management and Compliance Assurance, Water Protection and Land Reuse Bureaus have each assigned Quality Assurance Bureau Contacts to address QMP compliance efforts for their respective bureaus. DEEP's Quality Assurance Coordinator will coordinate the Bureau efforts to maintain consistent practices among programs and Bureaus.

3. Written Plans and Guidance.

DEEP's data quality management efforts will follow written plans and guidance, which each EPA-funded program must generate. All staff data operations shall conform to the appropriate plan and guidance documents.

4. State and Federal Laws and Requirements.

The DEEP quality assurance system will be maintained in accordance with applicable state and federal laws and rules, standards, guidance, contractual requirements, and sound management practices.

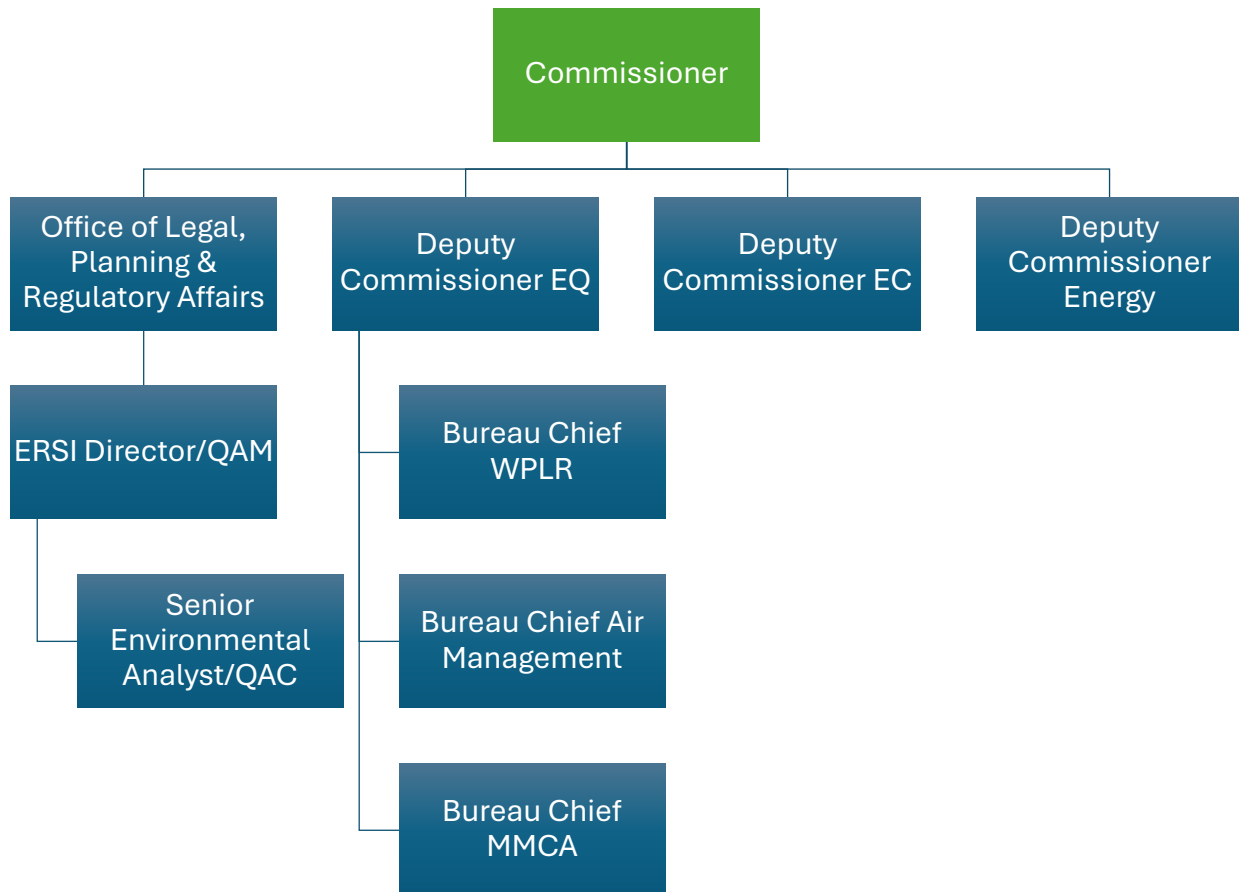
Issued by: /S/Commissioner Robert J. Klee

Date: June 18, 2015

Special Instructions: Replaces directive 3130 D.1 dated 4/14/05.

Appendix B: Partial Organizational Chart

Information on DEEP's organization is found at DEEP's Human Resources Division: [current organizational chart for DEEP](#).



EQ=Environmental Quality
EC=Environmental Conservation

Appendix C: References

References for Environmental Information Policy, Procedures, and Standards, EPA

U.S. EPA, Region 1, Quality Management Plan Guidance (June 10, 2025)

U.S. EPA, Environmental Information Quality Policy (EPA CIO 2105.4, March 2024)

U.S. EPA, Environmental Information Quality Procedure (EPA CIO 2105-p-01.4, March 2024)

U.S. EPA, Guidance on Systematic Planning Using the Data Quality Objectives Process (EPA QA/G-4, February 2006)

U.S. EPA, Quality Management Plan Standard (EPA CIO 2105-S-02.1, March 2024)

U.S. EPA, Quality Assurance Project Plan Standard (EPA CIO 2105-S-02.1, April 2024)

U.S. EPA Region 1, EPA New England Environmental Data Review Program Guidance (June 2018)

U.S. EPA Region 1, EPA New England Environmental Data Review Supplement for Region 1 Data

Review Elements and Superfund Specific Guidance/Procedures (September 2020)

U.S. EPA Region 1, Quality Assurance Project Plan Program Guidance (May 2024)

Appendix D: Definitions

Assessment—The evaluation process that is used to measure the performance or effectiveness of a system and its elements. As used here, assessment is an all-inclusive term used to denote any of the following: audit, performance evaluation, management review, peer review, inspection, surveillance, or readiness review (including competency assessment, pre-award assessment of proposal, or technical assessment), peer consultation, product review (e.g., data inspection, software testing, pre-dissemination review, or review of contractor deliverables).

Data—A quantitative or qualitative representation of values, facts, observations, or ideas in a formalized manner capable of being transmitted, processed, stored, analyzed, interpreted, and/or communicated by some process, whether on paper or in electronic form.

- Qualitative data—is descriptive.
- Quantitative data—is numerical.
- Primary data—are data observed, collected, stored, or generated directly for a specific purpose.
- Existing data—are data that have been collected, derived, stored, or reported in the past or by other parties (for a different purpose and/or using different methods and quality criteria). Sometimes referred to as data from other sources.
- Metadata—is structured information that describes, explains, locates, or otherwise makes it easier to retrieve, use, or manage an information resource.

Data Standard—Documented consensus-based agreement on the format and definition of common data.

Environmental Information—Includes data and information that describe environmental processes or conditions which support EPA’s mission of protecting human health and the environment.

Environmental Information Operations—A collective term for work performed to collect, produce, evaluate, or use environmental information and the design, construction, operation or application of environmental technology.

Environmental Programs—Work or activities involving the environment, including but not limited to, characterization of environmental processes and conditions; environmental monitoring; environmental research and development; the design, construction, operation,

or application of environmental technologies; and laboratory operations on environmental samples.

Quality Program—The totality of management controls, processes, and documentation in EPA’s planning, implementation, and assessment for ensuring the quality of Agency environmental information operations products and services.

Appendix E: Current Employees

