Quality Assurance Management Plan

For the

Office of Ecosystem Projects

State of Florida
Department of Environmental Protection

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Prepared by
Office of Ecosystem Projects

Prepared December 2009
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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 executes the procedures discussed in the plan.

3/31/15

X

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Director

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1.0 Introduction

The Office of Ecosystem Projects (OEP) receives federal funding through Section 106 to implement a portion of the Department's regulatory responsibilities under the Clean Water Act, and is therefore required to develop and submit a Quality Assurance (QA) plan pursuant to Rule 62-160, Florida Administrative Code (F.A.C.). The Florida Department of Environmental Protection's (Department/FDEP) 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 is of sufficient quality to support Department decisions. The Department's Secretary is committed to implementation of the quality assurance requirements in the DEP Quality Management Plan (QMP) and as authorized in Section 403.0623, Florida Statutes (F.S.) (Environmental data; quality assurance) and Chapter 62-160, F.A.C. (QA Rule). It is the Secretary's intent to carry out these obligations and requirements as detailed in the Department's QA Directive, DEP 972, effective September 18, 2009.

In order to execute the components of the DEP QA Directive, the Office of Ecosystem Projects (OEP) has developed a QA system which is outlined in this QA management plan (QAMP). The QAMP outlines procedures ensuring work produced by OEP staff is of sufficient quality to support Department decisions, is of verifiable quality, and meets the objectives of the Department required by federal and state law. OEP does not have program specific rules, but has the flexibility through statute to issue restoration permits in lieu of other requirements, and therefore draws from other program rules where appropriate, including but not limited to: Chapters 120, 373, and 403, F.S.; Chapters 62-4, 62-110, 62-113, 62-160, 62-302 (tables), 62-340, 62-341, 62-343, 62-600, 62-601 (Figure 1, Figure 2, Figure 3), 62-610, 62-611, 62-620 (guide), 62-621, 62-625, 62-640, 62-650, 62-660, 62-670, 62-671, 62-672, 62-673, 62-699, 40E-1, 40, and 41, F.A.C.; and the proprietary rules, Chapters 18-2, 18-14, 18-18, 18-20, and 18-21, F.A.C.

This QAMP explains the process and criteria by which the Quality System (QS) is managed and details the process of program coordination, training, execution, assessment and action plans we undertake to ensure that QA guidelines are met. Our QAMP is utilized as an instrument of internal communication to inform our staff of current and future QA activities and it discusses how specific QA duties are assigned to responsible staff. Where appropriate, we cite existing internal and external documents, including training manuals, guidance documents, SOPs, Rules, etc.

OEP is committed to follow QA and quality control (QC) management practices in producing all of its regulatory authorizations and associated documents. We expect all staff to 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. We will revise our QAMP as needed, and pledge to ensure the consistent application of procedures and criteria. This plan and its revisions also serve as an archival record of our formal QS.

2.1 Quality Assurance Objectives

It is the OEP's objective to ensure that the following is of sufficient quality to support Department decisions, is of verifiable quality, and meets the objectives of the Department required by federal and state law:

- Project planning,
- Permit processing,
- Permit compliance,
- Data generation, interpretation, reporting, and evaluation, and
- Contract and Grant Management including trust funds
- Record management associated with program activities.
- Participation in Task Forces, Committees, and Technical Groups

Various section manuals have been established to ensure that program functions meet quality assurance objectives. Procedures for regulatory authorizations and project compliance evaluations are outlined in the Permit Writer's Manual and Permit Compliance Manual respectively. The manuals establish section consistency, address roles and responsibilities and memorialize standard operating procedures (SOPs). Water quality data is reviewed pursuant to the guidelines in the following documents as well as established Department wide protocols:

- Water Quality Data Review Manual

- Water/Sediment Quality Review: Technical Guidance Document
- A Protocol for Monitoring Mercury and Other Toxicants
- CERP Guidance Memorandum: Toxic Substances Screening Process – Mercury and Pesticides
- Trust funds: DEP Intranet Trust Funds
- NPDES Permit Writer's Manual
- Turbidity Monitoring Manual (internal)
- The Florida Stormwater, Erosion, and Sedimentation Control Inspector's Manual
- Florida Erosion and Sediment Control Designer and Reviewer Manual

Other SOP and Guidance manuals include: the New Employee Handbook, Save Our Everglades Trust Fund Manual, Clearinghouse Manual, and the Cash Receiving Applications Manual.

3.1 Policy Statement

It is the OEP policy to:

- Use scientifically valid and legally defensible data for our decisions affecting protection of the environment;
- Maintain, update, and implement the QA Program as outlined in this document;
- Adaptively manage our QS to be consistent with provisions of the Department's QMP;
- Ensure that each individual is properly trained to execute their assigned tasks and job functions;
- Develop Manuals that describe Standard Operating Procedures (SOPs) for the various work processes the section performs (permitting, compliance, review of water quality data);
- Implement procedures to evaluate the quality of data we use and to implement corrective actions when data does not meet our Data Quality Objectives;
- Implement procedures to assure that the Department has reasonable assurances that QA objectives and criteria specified in this manual will be met;
- Periodically audit the performance and record-keeping practices of data generators that provide data to the Department;
- Implement quality assurance procedures for the management of our data repositories; and
- Perform a yearly systematic assessment of our QA activities, including any corrective actions, with the findings submitted to our Quality Assurance Officer.

4.0 Code of Ethics

All employees of OEP are held to high professional and ethical standards while performing their duties. All employees of OEP 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 or refresher class as applicable. Improper, unethical or illegal actions will be dealt with according to the published Administrative Directives of the Department (Administrative Directives - DEP 202).

In carrying out the duties of their positions, all DEP staff are expected at all times to be aware of and abide by the Department's Standards of Conduct, as well as any and all departmental and/or work unit rules, directives, policies, procedures, and/or general orders applicable to performing the duties of the position. Staff are also expected to actively support and work toward fulfilling the Agency's Affirmative Action objectives and perform the duties listed in their position description and performance expectation plan.

5.0 Organization and Responsibilities

5.1 Overview

Our program first submitted a Quality Assurance Manual in 2009. Since that time, we have undergone several reorganizations and there is no longer a distinction between the OEP, Program Coordination and Regulation Section, and Watershed Management and Planning Sections. All ecosystem restoration staff previously in the Division of

Environmental Assessment and Restoration and the Southeast District Office were aligned under the Office of Ecosystem Projects in July 2011 to streamline resources and program functions. In November 2012, additional restructuring was put into place to further streamline office functions and improve communication and coordination between staff in Tallahassee and West Palm Beach.

5.2 Scope

The OEP bears significant responsibility for activities required through the Everglades Forever Act (EFA, s. 373.4592, F.S.), the Comprehensive Everglades Restoration Plan (CERP, ss. 373.026, 373.470, 373.1501 and 373.1502, F.S.), the Northern Everglades and Estuaries Protection Program (NEEPP, s. 373.4595, F.S.), Florida's "Restoration Strategies", a $880 million consent order issued to the South Florida Water Management District (a suite of additional water quality projects to work in conjunction with the existing Everglades Stormwater Treatment Areas (STAs) to meet the WQBEL), and related restoration efforts.

> The office is responsible for all Department policy, programmatic, technical, and regulatory responsibilities under these statutes. Plan elements are complex, and require a balanced approach to the protection of water and ecological resources with the often competing objectives of water supply and flood control integral to the existing regional surface water management system of canals and flood control structures. Projects include the construction and operations of large scale civil works including reservoirs, Flow Equalization Basins (FEBs), impoundments, and stormwater treatment areas, which improve the quality, timing and distribution of water. These activities are further described in the OEP briefing documents located on the EVG drive: \\FLDEP1\OWPER\EVG\Administrative\Employee Briefing_OEP Overview\Briefing

Restoration of the greater Everglades ecosystem is accomplished through partnerships between federal, state and local governments and stakeholders. Therefore, our "customers" are not typical permittees, they are our partners and the OEP closely coordinates with them to implement restoration efforts. Staff work closely with its permittees, primarily the South Florida Water Management District (SFWMD) and the U.S. Army Corps of Engineers (USACE), to facilitate the permit application and compliance process. This is accomplished through regular communication with customer contacts and informal reviews of permitting and technical documents to increase the quality of the documents submitted to the Department, and minimize the potential for increased processing time and requests for additional information (RAIs) and facilitate proactive resolution of administrative and field compliance issues. Developing and maintaining this level of communication with customers has a positive effect on the quality practices of the office by increasing efficiency, reducing the probability for error, and facilitating early identification of potential challenges and subsequent resolution.

OEP submits a Priorities Plan to the Deputy Secretary on an annual basis to ensure that program responsibilities align with DEP and statewide goals and objectives. These are developed to align with the Long Range Program Plan which is submitted through the DEP Budget Office to the Governor's Office annually. The plan describes the scope of OEP's program as it relates to other Department objectives.

> The priorities plan can be found on the CERP drive at the following location: \\fldep1\owper\evg\Administrative\Employee Briefing_OEP Overview\Briefing\OEP Priorities

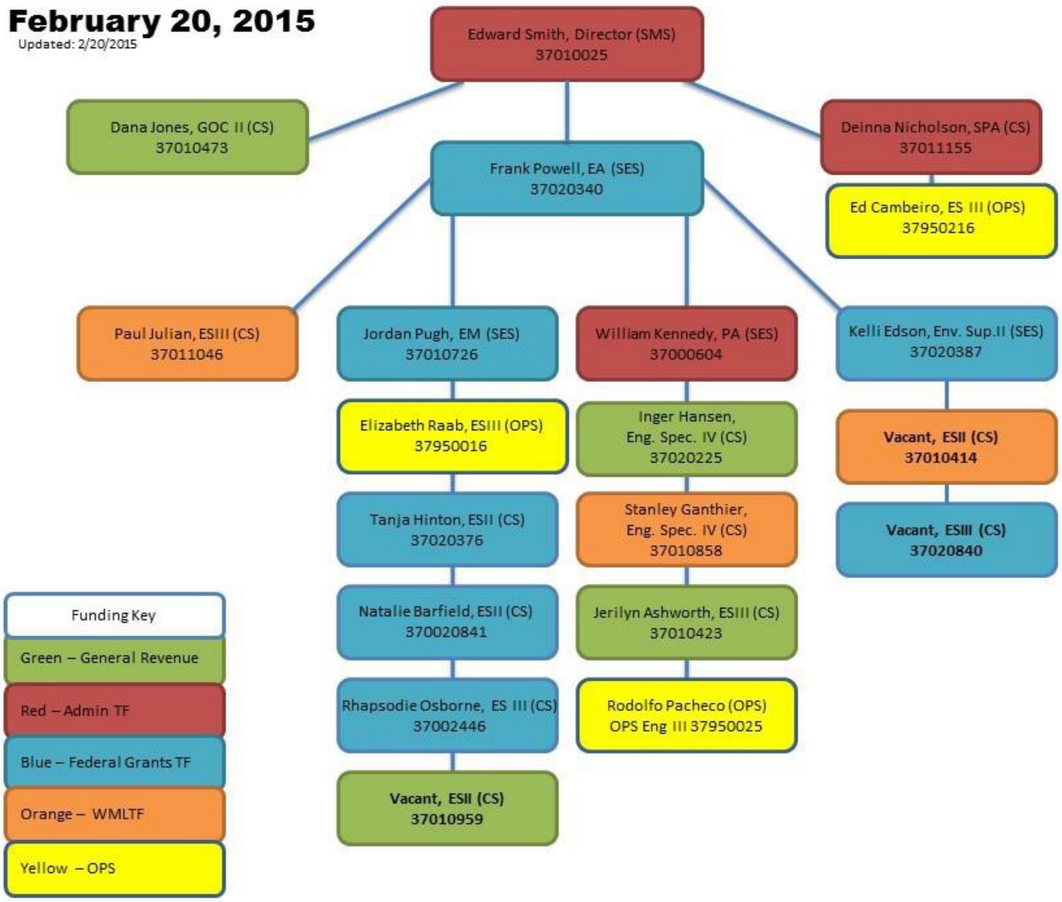
5.3 Organization

The OEP reports to the Deputy Secretary for Ecosystem Restoration. OEP, along with the Florida Coastal Office, the Division of Environmental Assessment and Restoration, and the Division of Water Funding, comprise the four primary program areas that have enormous implications for environmental and water quality protection in Florida: developing statewide water policy and overseeing the water management districts largely responsible for implementing that policy; restoring Florida's Everglades and other related South Florida ecosystems; and managing Florida's aquatic preserves, including more than four million acres of valuable submerged lands and coastal uplands.

Positions in the OEP include administrative, supervisory, professional and technical support (Figure 1). The division's workload is divided into several functional areas: programmatic, planning, permitting, compliance, all of which include technical support for water quality, biological and engineering.

Although all supervisory and professional personnel are assigned to a specialized functional area, the section's activities often require the combined support of personnel from all areas.

Figure 1. Office of Ecosystem Project Organizational Chart



Staff currently in the Office of Ecosystem Projects: Upper Level: Edward Smith, Director; Dana Jones, Government Operations Consultant; Frank Powell, Environmental Administrator; Deinna Nicholson, Senior Program Analyst; Ed Cambeiro, Environmental Specialist III. Middle Level; Paul Julian, Jordan Pugh, William Kennedy, Kelli Edson. Lower Level; Elizabeth Raab, Tanja Hinton, Natalie Barfield, Rhapsodie Osborne, Vacant, Inger Hansen, Stanley Ganthier, Jerilyn Ashworth, Rodolfo Pacheco, Vacant, Vacant.

OEP is generally organized by the functional program areas described below:

A. Planning & Technical Support
B. Regulatory (Permitting & Compliance)
C. Programmatic

A. Planning & Technical Support

Staff are technical (engineering or biological or water quality) and project area subject matter experts who participate in interagency planning of projects to ensure they are consistent with the requirements of the governing rules and statutes while achieving restoration goals. Staff review and comment on technical documents submitted with permit applications and advise permit writers during development of special conditions to ensure environmental and structural project objectives are met. Planning staff serve as the local representatives on CERP Project Delivery Teams and on the various technical groups and committees as described in Section 12.

B. Regulatory (Permitting and Compliance)

As the majority of projects described above have been declared in the public interest through the implementing statutes, the Office implements a regulatory program unique within the agency. Staff coordinates closely with agency partners, including the USACE and the SFWMD, to ensure smooth transition from project planning to authorization (permitting) and finally to successful construction, operation and maintenance (compliance). Projects are evaluated to determine whether or not sufficient information has been provided to demonstrate that the benefits, goals and objectives of restoration activities will outweigh potential environmental impacts, and are conducted in a manner consistent with Florida law. Key consideration is given to impacts to wetlands and endangered species, ensuring water quality standards will be met, that project components will not pose a serious danger to public health safety or welfare, and that projects will achieve design objectives. Staff performs field inspections to ensure sound engineering practices and implementation of best management practices to avoid and minimize environmental impacts during construction. Finally, projects are monitored to ensure long term compliance, particularly with water quality standards and achievement of project water quality improvement objectives.

C. <u>Programmatic</u>

The office ensures the State of Florida's interests are represented through policy and program development, which includes legislation, funding, project scheduling, and integration of priorities across the plans referenced above to ensure a holistic approach to South Florida ecosystem restoration. Staff provide technical support for legislative activities related to Everglades restoration; manage legislative appropriations for restoration activities; provide technical support to the Office of General Counsel on Everglades restoration litigation; and review documents distributed through the Florida State Clearinghouse to ensure consistency with the Florida Coastal Zone Management Act.

5.4 Quality Assurance Responsibilities of Personnel

Implementation of the QA Plan requires active participation throughout all levels of the program. Supervisors and the Operations and Management Consultant, who serves as the personnel liaison, maintain current copies of position descriptions and performance plans. Performance expectations are developed to align with the OEP Priorities and the DEP Long Range Program Plan. Supervisors update performance expectations at least annually, or more frequently as requested by the DEP Personnel Office.

In addition to the position descriptions and performance plans kept on file with the personnel office, a detailed roles and responsibilities table describing the relationships of all OEP staff can be found on the CERP drive at the following location: \\fldep1\owper\evg\Administrative\Employee Briefing_OEP Overview\Briefing\OEP Priorities

In general, QA responsibilities within OEP are associated with the review and collection of water quality, biological, and hydrologic data. All projects are monitored for compliance with water quality standards and achievement of water quality improvement through nutrient reduction and ecological performance objectives. These evaluations utilize water quality, water quantity, and ecological data collected by the SFWMD, USACE, and their contractors. OEP staff participate in the review and development of monitoring plans as part of planning, regulatory, and programmatic activities. OEP staff are also responsible for data analysis and reporting to ensure compliance with water quality criteria, notably the numeric phosphorus criterion within the Everglades Protection Area contained in 62-302.540, F.A.C. Regulatory and technical staff evaluate the validity of the data and interpret analytical results to determine whether or not compliance issues exist with issued permits. All monitoring, record keeping and data archiving is conducted according to FDEP approved standard operating procedures.

Due to the commitment and need to make scientifically defensible decisions associated with regulatory authorizations, ongoing litigation associated with Everglades water quality, and frequent public record requests, OEP has also focused QA efforts on administrative record keeping. All staff are responsible for activities such as the following:

- Completes written reports, creates, organizes and maintains administrative files.
- Develops work processes to ensure programmatic consistency.
- Tracks deadlines and prepares documents for review within timeframes specified by rules and statutes, section procedural manuals, and supervisor.
- Updates spreadsheets and databases, maintains and organizes electronic and hard copy folders of documents and files in an organized manner.

Other key job responsibilities associated with conforming to the Department's QA Directive and this QA plan are highlighted below.

A. Quality Assurance

Under the Department's QA Directive, all OEP staff has the responsibility of:

- Routinely carrying out duties involving data (permitting, compliance, water quality & biological) collection, data usability evaluation, data interpretation, and the generation of DEP work products in a manner that ensures scientific defensibility and adherence to DEP rules and policies;
- Implementing corrective actions as directed by the QA Officer and/or supervisors;
- Providing feedback to the program QA Officer for improving the quality system;
- Understanding and implementing the requirements of the OEP QA Plan; and
- Updating the training database.

B. Supervisory Roles (Director, Administrators, Managers, Supervisors)

Under the QA Directive, supervisors or their designee(s) has the following duties:

- Ensures that a Quality System, which conforms to the Department QAMP, is fully operational in their program;
- Designate a QA Officer and provide general oversight;
- Coordinate with the QA Officer to delegate some responsibilities to properly trained and qualified staff, when appropriate;
- Provides support, resources, and staff training to ensure successful implementation;
- Evaluate proposed Data Quality Objectives (DQO's) and Data Quality Indicators (DQI's) to ensure they meet program needs;
- Periodically evaluate the effectiveness of staff's data quality activities, including review of audit results;
- Evaluate corrective action policies and procedures to be implemented when data do not meet program DQO's;
- Request Quality of Science reviews and/ or training from the FDEP Aquatic Ecology and Quality Assurance Section as necessary, and review audit results with the QA Officer; and
- Review the annual QA Report to the Secretary, and discuss findings with the QA Officer.

C. Quality Assurance Officer (QAO)

Under the QA Directive, the QAO has the following duties:

- Coordination of and participation in the quality evaluation of data used by the OEP;
- Provides general oversight (with support from supervisors) of staff performance of assigned QA functions;
- Coordinate with Administrators, Permit Leads, Compliance Coordinators, Water Quality & Biological Technical Leads, and Engineers to create procedures within their respective areas;
- Coordinates and/or conducts audits to ensure employee and permittee compliance with QA objectives;
- Ensures that corrective actions are implemented for non-conformance incidents as determined by the evaluation of the process against our section's QA objectives. Some corrective actions may be more appropriate for supervisors to address;
- Assists program managers in the development and implementation of the QS, and coordination of associated training needs; and
- Coordinates QA activities for the OEP, including training, audits, and corrective actions, and are reported on annually in the QA Report to the Secretary.

D. Technical Leads (Water Quality, Biology)

The Technical Leads have the following duties:

- Act as the technical coordinator on Everglades restoration activities between the federal, state, local agencies and other stakeholders;

- Coordinate the Department's internal technical reviews of Everglades restoration activities including but not limited to the review of technical documents and information related to the Everglades Forever Act (EFA, s. 373.4592, F.S.), the Comprehensive Everglades Restoration Plan (CERP, ss. 373.026, 373.470, 373.1501 and 373.1502, F.S.), the Northern Everglades and Estuaries Protection Program (NEEPP, s. 373.4595, F.S.), and Florida's "Restoration Strategies";

- Provides project level management on assigned projects. This includes acting as the Department's representative on all assigned restoration projects and attending all related planning/design/coordination meetings; meeting with applicants and parties whose interests may be affected to best manage proposed activities so as to not conflict with Department Rules and Statutes; and to provide technical support to project working groups and applicants to ensure regulatory responsibilities are accounted for in the planning process;

- The position will provide technical review and biological support and will organize, schedule, perform and complete Uniform Mitigation Assessment Method (UMAM) evaluations assigned. Responsibilities include data/intelligence gathering and sharing information within the DEP and to provide standardized technical support and guidance for agency regulatory staff;

- Reviews monitoring plans submitted with permit applications. Reviews and interprets data to determine compliance with regulatory requirements. Coordinates flocculant/polymer review for all projects;

- Lead author for Volume 1, Chap. 3A (Nutrients) and 3B (Sulfur and Mercury) of the South Florida Environmental Report; and

- Provide technical support and manage studies and contracts on Everglades water quality issues (i.e. sulfur, mercury).

E. Engineering Lead

The Engineering Lead has the following duties:

- Lead engineer for assigned projects. Provides engineering support for south Florida restoration activities which the OEP is responsible for providing Departmental authorization;

- Reviews and provides recommendations based on submitted construction plans, technical specifications, operational plans, regional system operations information and documents related to the activities requesting authorization;

- Provides project level management on assigned projects. This includes acting as the Department's representative on all assigned restoration projects and attending all related planning/design/coordination meetings; meeting with applicants and parties whose interests may be affected to best manage proposed activities so as to not conflict with Department Rules and Statutes; and to provide technical support to project working groups and applicants to ensure regulatory responsibilities are accounted for in the planning process; and

- Provides regulatory support for authorizations issued by OEP. Duties include review and interpretation of Department Rules and Statutes and their effect on proposed activities; perform project related compliance activities such as site visits, inspections, and preparing recommended actions for non-compliance activities; and working closely with regulatory staff to prepare necessary permitting documents.

F. Regulatory (Permit and Compliance) Leads

The Regulatory Leads have the following duties:

- Reviews, analyzes, evaluates, and processes applications for permits by the USACE and the SFWMD related to South Florida Restoration efforts, in accordance with the Everglades Forever Act (373.4592, F.S.), Part II of Chapter 373, F.S. (dewatering and consumptive use activities), Comprehensive Everglades Restoration Plan Restoration Act (373.1502, F.S.), Northern Everglades and Estuaries Protection Act (373.4595, F.S.), and other applicable statutes and Department rules including those administered by the Environmental Resource Permitting Program (ERP) to determine whether or not applications contain sufficient information to demonstrate that the benefits, goals and objectives of restoration activities will outweigh potential environmental impacts, and are conducted in a manner consistent with Florida law;

- Ensures that DEP has reasonable assurances that project component will achieve the design objectives set forth in the detailed design documents submitted as part of the application (many projects have design objectives related to water quality improvement), and that state water quality standards, including water quality criteria and moderating provisions, will be met. Under no circumstances shall the project component cause or contribute to violation of state water quality standards;

- Post permit issuance review of permit materials including deliverables, water quality reports, notices, annual comprehensive project reports, engineering inspections and other information to ensure construction and operational activities are in compliance with authorized activities; and

- Conduct field inspections of restoration projects to ensure project compliance during construction and operation. Provide guidance associated with Best Management Practices, land management, erosion and sedimentation control, exotics control, and other techniques to help protect and minimize impacts to surface waters and environmentally sensitive areas including wetlands.

G. Programmatic (Director, Administrators, with assistance from other staff as needed):

The Programmatic staff have the following duties:

- Responsible for the development of a comprehensive water quality management strategy for South Florida in coordination with federal, state, tribal and local entities;

- Ensures that the implementation of Everglades protection and restoration efforts are consistent with state statutes and rules;

- Represents the Department on the Everglades Technical Oversight Committee and Principals meeting as required by the Settlement Agreement;

- Assists in the review of various research and monitoring activities required in accordance with the CERP and EFA. Synthesizes technical information for decision making and/or presentation to various audiences. Perform detailed technical, regulatory, planning and policy reviews on all formal correspondence provided to the director for signature and/or approval;

- Act as a liaison for all CERP, EFA, and NEEPP activities such as: coordination/collaboration with internal Department programs on the development of total maximum daily loads, basin management action plans, minimum flows and levels, implementation of source controls, water quality/quantity restoration objectives;

- Produces necessary technical support materials for presentations at technical meetings and workshops as required. Assists in the review and preparation of technical reports, research and monitoring activities, and other activities on a variety of topics related to restoration efforts; and

- Administers the program's responsibilities concerning the Save Our Everglades Trust Fund. Coordinate with budget, finance and accounting, program, state lands and SFWMD staff to ensure that funds are spent, tracked, and reported in accordance with legislative guidelines and program policies.

6.0 Training

All OEP personnel are properly trained to perform their duties. Section 3.0 of the OEP New Employee Handbook, located on the internal shared drive, (\\fldep1\owper\EVG\Administrative\Employee Handbook) provides additional information on DEP required and OEP job specific trainings. Training sessions covering a variety of topics relevant to OEP are held for OEP employees throughout the year. The OEP Training Access database, yearly training calendar, and past presentations and training information can be found at the following common drive location: \\fldep1\owper\EVG\Programmatic\Training

This training information is periodically reviewed by the section supervisors and QA officer to assess whether our staff performance conforms to the policies and procedures of our section. Training information is also reported in the annual OEP QA Report to the Secretary.

OEP training procedures consist of:

A. Agency required training (Training Webpage):
- New-hire training
- Security Awareness Class
- Sexual Harassment
- Plain Language
- Cultural Diversity
- Ethics
- Public Records
- P-card training: P-card Usage Policy

B. OEP specific training (All OEP personnel):
- Training for QA functions
  - QA Training Presentations
- Review of OEP New Employee Handbook
  - \\Fldep1\owper\EVG\Administrative\Employee Handbook
- Review of Permit Writers Manual
  - \\fldep1\owper\EVG\Procedures & Guidance Docs\Permitting Procedures\Permit Writer's Manual
- Review of Water Quality Review Manual
  - \\fldep1\owper\EVG\Procedures & Guidance Docs\WQ
- Review of Permitting Application (PA) Trainings Manual
  - \\fldep1\owper\EVG\Procedures & Guidance Docs\Permitting Application Procedures PA
- Review of Permit Compliance manual
  - \\fldep1\owper\EVG\Compliance Procedures

Below are some of the additional trainings recommended for OEP staff:
- SWERP Training, located on internal shared drive
  - \\Fldep1\owper\EVG\Programmatic\SWERP
- Stormwater Erosion and Sedimentation Control Inspector Training (All Permit Leads should take this course as soon as possible after being hired):
  - Erosion Training Site
- Records Management Training
  - Records Management Webinar
- EPA Sponsored Online Training (WQS, Clean Water Act, NPDES, AQUATOX, BASINS etc.)
  - EPA Training Website
- Quality Assurance training:
  - QA Training Website

- Uniform Mitigation Assessment Method (UMAM) Training
  - Classroom training offered periodically by the Division of Water Resource Management's Submerged Lands and Environmental Resource Permitting Section
- NPDES permit manual (EFA STA /Watershed permits only), located on internal shared drive:
  - http://depnet/wrm/wfreg/docs/waste/pwriters/PWriters.pdf
- TREEO training: hands-on training course in environmental field sampling (Recommended for Technical Lead as needed)
  - TREEO Training Website

Employee training is entered into the OEP Employee Training Access database located on the internal shared drive (\\fldep1\owper\EVG\Programmatic\Training).

All OEP employees are required to review, understand, and apply the guidelines as outlined in the above listed training manuals. Agency required training is offered as online courses. Manuals (see links above) have been written to facilitate this effort. A Training DVD Binder is also available in Room 822 of the Douglas Building and contains a variety of topics related to OEP activities.

On an "as needed basis" OEP employees are required to provide technical assistance in editing and updating the manuals listed above under "OEP" and "job specific" training.

7.1 Documentation

Documentation is of critical importance to OEP. Accurate documentation is an important factor for determining the success of QA activities. Our section carries out record-keeping procedures as indicated in the Permit Writer's Manual and Permit Compliance Manual, located on the internal shared drive:

- \\fldep1\owper\EVG\Procedures & Guidance Docs\Permitting Procedures\Permit Writer's Manual
- \\fldep1\owper\EVG\Compliance Procedures

7.2 Generation, Retention and Storage of Records

OEP' record keeping practices are consistent with Chapter 119, F.S. All information submitted to OEP is recorded as a hardcopy in the project binder and/or filed electronically on the OEP common drive (see the Permit Writer's Manual Appendix J, Permit Compliance Manual and the internal shared drive \\fldep1\owper\EVG\Procedures & Guidance Docs\EVG Drive Organization for EVG drive organization). Deliverables and relevant correspondence received via the Compliance e- mail inbox (RPPS_Comp@dep.state.fl.us) are also kept on file. Information regarding permit processing, compliance, or other relevant information is entered into the appropriate database software program(s). Permit application records and project files are also filed in a project binder in accordance with section and Department guidance, see section
12.0 Record Keeping. In this binder, a tracking sheet is included where all correspondence is briefly described.

<u>QA Management of Computer Resources for Environmental Data Operations</u>

Roles and responsibilities for management and oversight of our Section Database are described in the <u>Permit Writer's and Compliance Manuals</u>. The OEP Section Database facilitates tracking of permit applications, modifications, requests for information, authorization requests, time extensions and renewals, annual reports, planning documents, critical milestones, compliance deliverables, and generation of subsequent related reports. Generally, the database reports allow the staff to identify outstanding documents, ensure complete file turnover, and verify project compliance. Report examples include, but are not limited to, Permitting Milestones Timeframes, QA Checklist, Quarterly Site Visits, and Summary Deliverable Reports. Additionally, the OEP database is utilized to produce weekly reports which are a critical team management tool. The OEP Section database is an integral tool in ensuring QA/QC throughout the life of all EFA, CERPRA, and NEEPP projects. In addition, the Database houses a "QA Checklist" which assists staff in ensuring all relevant permitting and administrative record keeping tasks for each permit action have been completed.

All documentation includes a revision date to indicate date(s) of use and to ensure the most current version of the documentation form is being used or referenced.

OEP staff are participating in the State and Department wide effort related to streamlining procedures and establishing schedules for retention and access to records, and disposition of duplicate or obsolete documentation, including objectives related to "going paperless." OEP's business plan includes priorities and objectives to meet both program and Department wide goals and tie into our existing QA objectives related to maintaining the administrative record in support of documenting decision making related to our regulatory and programmatic responsibilities. We are exploring options for record keeping and are coordinating with OTIS to assist in developing a profile in order to upload and store OEP records within OCULUS, a record storage and management system.

7.2 Types of Documentation/Reports Generated

OEP generates or contributes to several types of documentation and records. Examples include, but are not limited to those listed below:

<u>Planning/Technical:</u>

- Water quality data
- Water Quality Monitoring Plans
- Chapters in the South Florida Environmental Report
- UMAM
- Engineering specifications, plans and reports
- Operation Manuals
- Hydrologic Models

<u>Permitting:</u>

- Permits/Renewals
- Permit modifications
- Notice of Applications/CZMA Review and Request for Comments
- Requests for Additional Information letters
- Completeness letters
- Notice Of Intent letters
- Exemptions
- Letter Authorizations

<u>Compliance – OEP compliance determination comments, records of correspondence, and documentation of:</u>

- Environmental Protection Plans
- Stormwater Pollution Prevention Plans
- Site Specific Dewatering Plans & Water Use Applications
- Quarterly Turbidity Reports
- Vegetation Monitoring Reports
- As-built and record drawings
- OEP Field Inspections
- Construction, Maintenance and Operational Meetings
- South Florida Environmental Report
- Comprehensive Project Annual Reports
- Annual Levee and Structure Inspection Reports

<u>Programmatic:</u>

- Memoranda / Letters submitted through the Florida State Clearinghouse
- Responses to citizen and stakeholder inquiries and comments
- Approval of annual financial workplans and reports
- Reports of appropriations, expenditures, documentation associated with financial disbursements
- Responses to audits of financial procedures and documents
- Track status of land acquired with bond funds to ensure compliance with tax provisions
- Secretarial Orders approving CERP projects
- Legislative Budget Requests

- Cooperative Agreements and Memoranda of Understanding
- Guidance Documents (e.g., CERP Water Quality Guidance Memorandum, Guidance Memoranda required by the CERP Programmatic Regulations)
- Grants and Contracts

Reports, documents, comments, emails and memos issued by OEP developed and formatted for consistency with the procedures outlined in the respective SOP manual for the activity (Permit Writer, Compliance, WQ Manual, etc.).

7.3 Procurement of Items and Technical Services

OEP administers disbursement of funds from the Save Our Everglades Trust Fund pursuant to Sections 373.470 and 373.472, F.S. In addition to the guidelines provided in statute and yearly proviso in the General Appropriations Act guiding the use of funds, the Department has four cooperative agreements with the SFWMD which outline procedures for disbursement of funds, and guidance documents such as an eligible tasks table which have been created to increase efficiency in invoice processing are located at the following internal shared drive address, \\fldep1\owper\evg\Programmatic\SOETF.

OEP administers other legislative appropriations on a case by case basis and manages some contracts or grants that involve environmental data collection and monitoring, wetland restoration or protection and construction of public use facilities in natural areas. Staff follows state procurement process as outlined in DEP Directives 300, 315, 316, and 317 (already cited in QMP). Contract and grant agreement language contain requirements for specific quality assurance project plans to be submitted for review prior to project commencement. The work or data will be audited by the DEP Contract/Grant manager prior to acceptance.

OEP has one Operations and Management Consultant (OMC) responsible for overseeing procurement of items and technical services. The OMC coordinates with program and technical staff to ensure that activities contracted for data collection/generation, data management or scientific research have been conducted with technical and QA requirements. The OMC and program staff coordinate with budget, financial, and auditing staff to ensure compliance with state and federal financial requirements.

OEP provides oversight to ensure that data being collected by the SFWMD and USACE follows standard data quality procedures, and will be used to demonstrate whether or not CERP, NEEPP, and Restoration Strategies projects are meeting their intended objectives and performance measures. Guidelines are also provided in the Save Our Everglades Trust Fund Manual and the Cash Receiving Applications Manual.

7.4 Confidentiality

All records and documents generated by OEP are public records and may be subject to disclosure according to the guidelines and exceptions published in Chapter 119 of Florida Statutes. The procedures used for release of all data/documentation are detailed in the "Public Records Request" section of the Permit Writer's Manual. The OEP typically receives 5-10 public records requests per year.

8.1 Compliance, Audits, and Corrective Action

OEP tracks adherence to guidelines, Directives, office procedures, rules, and regulations through the following activities:

8.2 Audits

In addition to utilization of the Database, audits provide objective feedback concerning the effectiveness of our program's QS, and may identify areas in need of improvement. OEP conducts both internal (employee and Section) and external (permittee) audits. Internal audits evaluate staff implementation of administrative record keeping, permit processing, permit compliance activities and are facilitated by utilizing our Database. The Section's administration of the Save Our Everglades Trust Fund is typically audited annually by the Inspector General's office and is subject to other types of internal and external financial auditing. External audits include, but are not limited to site inspections, annual review of project files and the SFER, review of water quality data and verification of project design and specifications.

Audits are concluded with an audit report that summarizes the overall performance. Deficiencies are noted, and corrective actions are developed for each area in need of improvement. Audit reports are distributed as stated: the original is given to the permittee, employee, and their supervisor as applicable.

Supervisors are also required to implement and track performance measures established for the OEP and for the OEP as described in the business plan for OEP. In addition, supervisors are required to track progress towards meeting the new SMART goals recently required by personnel in addition to tracking overall performance and development of written performance evaluations for each individual employee. This is currently done for both career service and OPS staff within the section. Supervisors or the QA Officer may choose to perform more audits at their own discretion each year, or may be asked by senior managers to perform other types of similar types of audits/reviews.

8.3 Corrective Actions

If an audit identifies areas that need improvement or areas where procedures or requirements were not followed, then appropriate actions will be taken. Internal corrective actions may include follow-up training, directing staff to OEP guidance manuals, directing staff to their position description and performance plan, and/or or elevating to the supervisor. External corrective action will be addressed through follow up after field inspections (verbal, written, and phone calls), comments provided through review of permit and compliance documents, review of water quality and other technical data, and comments provided through the annual review of project files and the SFER.

8.4 Project Compliance

In addition to program coordination and permitting of Everglades' restoration projects, the OEP is responsible for the evaluation of compliance with regulatory authorizations. Review and verification of OEP project compliance is conducted by the Compliance Team, coordinated at the Program level and verified by the appropriate OEP team members based on expertise and historical knowledge required. These roles and procedures are explained in more detail in the Permit Writer's and Compliance Manuals.

The OEP performs weekly, quarterly, and annual assessments for all active permits by performing comprehensive reviews of adherence to permitted requirements during both the construction, operation and maintenance phases. Quarterly assessments rely on tracking and maintenance of the OEP Database and the generation of reports. Project compliance is evaluated annually through review and commenting on annual reports submitted by the permittee and during the annual South Florida Environmental Report (SFER) review.

9.0 Report Compilation

To provide the Secretary with information regarding DEP's ongoing QA efforts, our section describes and compiles the results of all appropriate QA activities, and relays it to the OEP Director for review prior to inclusion into the Departments' annual QA report to the Secretary which is compiled by the Water Quality Standards Program. Future adaptive management concerning our QA program is based on findings from audits and data review.

10.0 Approved Signatories

Approved signatories within the Department are stated as:

Drew Bartlett, Ecosystem Restoration Deputy Secretary
Edward C. Smith, OEP Director
Frank Powell, OEP Environmental Administrator
Deinna Nicholson, OEP Senior Program Analyst
Chad Kennedy, OEP Program Administrator
Jordan Pugh, OEP Environmental Manager
Kelli Edson, OEP Environmental Supervisor

Rhapsodie Osborne, OEP QA Officer

Official documents are clerked by OEP's Operations and Management Consultant. If he/she is not available, the Department clerk from the Office of General Counsel can be contacted to clerk the document (see Permit Writers Manual for clerking procedures).

11.1 Delegation of Authority

The Purpose of the Delegation of Authority is to establish all of the delegations of authority necessary for permit applications and related authorizations and other pertinent correspondence processed through the Office of Ecosystem Projects. Its authority is based on the DEP wide Administrative Directive 100, Delegations of Authority.

1. Purpose:

   To establish all of the delegations of authority necessary for permit applications and related authorizations and other pertinent correspondence processed through the Office of Ecosystem Projects.

2. Authority:

   Administrative Directive 100, Delegations of Authority

12.0 Record Keeping

The Florida Department of Environmental Protection's Office of Ecosystem Projects (OEP) hereby implements the following record keeping policy with all permitting, compliance and enforcement documents produced through the section.

All records, which may be disposed of, shall be disposed of in accordance with procedures in Administrative Directive DEP 335, as it may be changed from time to time. No permanent records shall be destroyed without written approval by the Department's Records Administrator on Form DEP 55-413, Records Disposition Document (General Services Forms).

The Department must at all times follow the General Schedule for State and Local Governments (GS1-SL) and the agency-specific records series, as they may be amended from time to time.

13.0 OEP Participation in Task Forces, Committees, and Technical Groups:

- Everglades Technical Oversight Committee - The Committee originated from the Settlement Agreement of July 11, 1991 as a mechanism for technical review and conflict resolution to support the Everglades Program begun by the Agreement and continued in the 1994 Everglades Forever Act (373.4592 F.S.).

- Restoration Strategies Principals Meetings - The Office in conjunction with USEPA, through an established consent order, consult bi-annually with the SFWMD on the development and implementation of a science plan geared toward identifying the factors that collectively influence phosphorus reduction and treatment performance within the Everglades Stormwater Treatment Areas in order to meet the water quality based effluent limitation (WQBEL) necessary for discharges to comply with the phosphorus criterion under 62-302.540, F.A.C.

- Restoration Strategies Technical Expert Team – developed the Science Plan in 2013 to identify studies that investigate the critical factors that collectively influence ultralow treatment performance and phosphorus reduction in the Stormwater Treatment Areas. Results from Science Plan studies will be used to inform the design and operation of water quality projects to meet the stringent phosphorus standard for the Everglades. Data and information gathered from the studies will also be incorporated into the development and refinement of the District's modeling tools.

- South Florida Ecosystem Restoration Task Force - The Task Force was established by Section 528(f) of the Water Resources Development Act of 1996. The Task Force: 1) Coordinates the development of consistent policies, strategies, plans, programs, projects, activities, and priorities addressing the restoration, preservation, and protection of the South Florida ecosystem; 2) Exchanges information regarding programs, projects and activities of the agencies and entities represented on the Task Force to promote ecosystem restoration and maintenance; 3) Facilitates the resolution of interagency and intergovernmental conflicts associated with the restoration of the South Florida ecosystem among the agencies and entities represented on the Task Force; 4) Coordinates scientific and other research associated with the restoration of the South Florida ecosystem; and, 5) Provides assistance and support to agencies and entities represented on the Task Force in their restoration activities.

- Working Group - established by in accordance with Section 528(f)(2)(d) of the Water Resources Development Act (WRDA) of 1996. The Florida-based group consists of 25 members representing tribal, local, state and federal entities. The duties of the Working Group are to: Assist the Task Force in its efforts to coordinate the development of consistent policies, strategies, plans, programs, projects, activities, and priorities addressing the restoration, preservation, and protection of the South Florida ecosystem; Prepare draft coordination documents for Task Force review to include the Biennial Report, Task Force Strategy and Land Conservation Strategy.

- Science Coordination Group - The Science Coordination Group (SCG) supports the Task Force in its efforts to coordinate the scientific aspects of restoration of the South Florida ecosystem. The SCG is primarily tasked with continually documenting and supporting the programmatic-level science and other research through updates and implementation of the Task Force's Plan for Coordinating Science. To enhance the integration of science and management, the SCG includes both senior managers and scientists appointed by the Task Force.

- Biscayne Bay Regional Restoration Team – The Biscayne Bay Regional Restoration Coordination Team (BBRRCT) was formed to develop and implement an Action Plan, the product of a multi-stakeholder initiative to protect and restore Biscayne Bay. The intent of the action plan is to integrate and coordinate restoration, enhancement, preservation projects, plans, and activities to help maintain a functioning Biscayne Bay ecosystem. The team provides science-based advice to the South Florida Restoration Task Force Working Group concerning construction, operation, and monitoring projects of the Comprehensive Everglades Restoration Plan (CERP) that relate to Biscayne Bay's freshwater supply. Maintaining adequate volume and appropriate timing and distribution of freshwater flow to Biscayne Bay is of paramount importance to the BBRRCT with respect to CERP's ongoing redesign of south Florida's water management system.

- Water Resources Advisory Commission (WRAC) – An advisory body to the SFWMD Governing Board and the South Florida Ecosystem Restoration Task Force. It is a forum for improving public participation and decision-making about water resource issues in South and Central Florida, Water Resources Advisory Commission Website

- Comprehensive Everglades Restoration Plan (CERP) Quality Assurance Oversight Team (QAOT) – A multi-agency team whose primary objective is to provide guidance on quality assurance and quality control issues for both CERP projects and programs. Office of Ecosystem Projects technical staff participates in an advisory capacity, participating in regular monthly scheduled meetings and special workshops.

- CERP RECOVER Leadership Group - responsible for coordinating and integrating the activities of the RECOVER technical teams and ensuring that the overall focus and direction of the implementation process remains consistent with the goals of system-wide restoration.

- Interagency Copper Working Group – The Interagency team was developed to evaluate issues with residual agrochemicals on land that will be flooded for restoration activities (e.g., reservoirs, Stormwater Treatment Areas, Dispersed Water Management).

- Northern Everglades Coordinating Agency Meetings - The Florida Legislature in 2007 expanded the Lake Okeechobee Protection Act to strengthen protection for the Northern Everglades. This is being achieved by restoring and preserving the Lake Okeechobee watershed and the Caloosahatchee and St. Lucie estuaries. The legislation required watershed plans for Lake Okeechobee (including Fisheating Creek), the Caloosahatchee and

St. Lucie Rivers and their estuaries.

- Dam Safety Modification Study - The USACE is conducting an evaluation known as the Herbert Hoover Dike Dam Safety Modification Study (HHD DSMS), HHD Website, in order to adequately address problems and develop alternatives for rehabilitation of the dike. The DSMS is more comprehensive than any study ever conducted on the dike. It is reviewing the geology and geometry of the dike in multiple locations. The study is examining impacts from a full range of structural and non-structural alternatives which can be implemented to reduce risk. The USACE expects the results of the study to provide the final roadmap toward the ultimate goal of reducing the failure risk at the Herbert Hoover Dike.