

2011 Annual Quality Assurance Report
Office of Ecosystem Projects
Program Coordination and Regulation Section

State of Florida

Department of Environmental Protection



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Executive Summary

The Program Coordination and Regulation (PCR) Section is part of the Office of Ecosystem Projects (OEP) and consists of personnel located in both Tallahassee and West Palm Beach. The PCR Section bears significant responsibility regarding south Florida restoration projects undertaken pursuant to the authority under the Comprehensive Everglades Restoration Plan Regulation Act (CERPRA, 373.1502, F.S.), the Everglades Forever Act (EFA, 373.4592, F.S.), and the Northern Everglades and Estuaries Protection Program (NEEPP, 373.4595, F.S., and the general responsibilities of the Department. Section responsibilities include program coordination, litigation support, policy development, permit review and processing, permit compliance, and administering disbursement and tracking of funds. In addition, the PCR Section provides technical support via participation and coordination in project planning, project design and engineering and research and monitoring activities required in accordance with the EFA, NEEPP and CERPRA.

In calendar year (CY) 2011, the PCR Section was aligned under the Office of Ecosystem Projects (OEP). The OEP is comprised of two Sections: the PCR Section and the Restoration Planning and Project Management (RPPM) Section. The PCR's Quality Assurance Plan will be updated during calendar year 2012 to reflect these changes. OEP's planning and project development responsibilities are primarily conducted by the RPPM Section staff located at the South Florida Water Management District headquarters. While their efforts are critical to the Division's responsibilities, the quality assurance plan presented here reflects efforts associated with those activities undertaken by the PCR Section. It is anticipated that the CY 2012 update will also result in a separate or combined plan for each of the Sections.

During CY 2011, the PCR Section built upon its previous Quality Assurance Management Plan (QAMP) by continuing to refine existing permitting, compliance, and data review procedures. The PCR Section focused significant effort on ensuring complete and accurate administrative record keeping including: maintenance of electronic databases, continued transition from hardcopy to electronic project files where applicable, and annual updates to Section guidance manuals. The PCR Section continued to refine its tracking and reviewing system for annual reports, compliance deliverables, permit requests, and coordination with our primary applicants, the United State Army Corps of Engineers (USACE) and South Florida Water Management District (SFWMD).

All Section staff participated in agency required training and resource area trainings specific to Water Quality Standards, GIS, Uniform Mitigation Assessment Method (UMAM), Wetland Assessment, Sediment and Erosion Control, Environmental Resource Permitting, State Lands, Bioremediation, Quality Assurance, and total maximum daily load (TMDL) training.

In 2012, the PCR Section plans on further modifying the existing database(s) to maximize its use as a tool for analyzing and tracking performance measures, placing more of an emphasis on regular internal trainings to expand and build on staff expertise in varying program areas and introduce formal audits.

Quality Assurance Implementation

For the PCR Section, QA is primarily applied across review of permitting, compliance, and data review procedures, administrative record keeping including: maintaining electronic databases, hardcopy and electronic project files, and annual updates to section guidance manuals. The PCR Section continues to refine its tracking and reviewing system for annual reports, data submittals, compliance deliverables and permit requests.

The PCR Section continues to work closely with our permittee's, the SFWMD and USACE, to facilitate the permit application and compliance process through regular communication with permitting contacts, bi-weekly meetings and informal reviews of permitting and technical documents to minimize the potential for increased processing time and requests for additional information (RAIs). The PCR Section administrator and manager have met with SFWMD and USACE management and staff to present these goals, clarify and identify key contacts to facilitate administrative and field compliance issues and to present the proposed revision to authorization process' for projects that the SFWMD is the local sponsor for.

The PCR Section has created a number of internal guidance documents for the functions we perform, to document section procedures and establish consistency. Many updates were made to existing PCR Section guidance manuals including the New Employee Handbook, Water Quality Data Review Manual, Permit Writer's Manual, Save Our Everglades Trust Fund Disbursement Procedures, Cash Receiving Applications, and the Permitting Application Database Manual to reflect Department and Division policies and priorities and to ensure program consistency. Revisions were also made to the "Protocol for Monitoring Mercury and other Toxicants" document which is a mutual agreement between the Department and the South Florida Water Management District.

New guidance documents developed this year include the Turbidity Data Review Manual, to assist permitting and compliance staff in reviewing turbidity data collected during construction activities and a GIS manual to assist permit and compliance leads is in progress. In addition, a significant amount of time and effort was spent developing and implementing our Permit Compliance Manual, and establishing communication procedures for staff recently moved into our section that are co-located in West Palm. Next year, the QAMP will be revised to reflect the changes the section has undergone over the past year.

Training

The PCR Section recognizes training as an essential component of successfully moving Everglades restoration efforts forward in a timely and efficient manner. In addition to agency required training, section specific training was offered and cross training opportunities were undertaken throughout 2011. Staff are encouraged to take advantage of all training offered by the Department, and any other training readily available online such as those provided by the Environmental Protection Agency. Examples of these include Water Quality Standards, Geographical Information System, Uniform Mitigation Assessment Method, Sediment and Erosion Control Inspectors Training, State Lands Determination, Bioremediation, Contract Management, and Quality Assurance. Employee training was tracked in the PCR Section Database and effectiveness of training for each staff member was evaluated by the Environmental Manager (EM) in the annual performance reviews in September of 2011.

The responsibilities of our section require coordination with many disciplines, both within and outside of our agency. Therefore, in 2011, the PCR Section scheduled informational sessions with some of the sections in the Division of Environmental Assessment and Restoration (DEAR) and Division of Water

Resource Management to facilitate a better understanding of each other's scope of responsibilities, develop more efficient working relationships, and to better understand how we may enhance one another's efforts in providing protection for Florida's natural resources. Some of these cross training sessions included participation from the Office of Submerged Lands and Environmental Resources (SLER), Watershed Assessment Program, Total Maximum Daily Load (TMDL), Groundwater and Springs, and the Non-Point Source Sections. In addition, frequent discussions and ongoing coordination with the Division of Waste Technical Support and Waste Cleanup Sections, the Bureau of Laboratories Toxicology and Chemistry Sections, and the Wastewater Program occurred due to the Section's involvement with particular contaminant issues and toxicity testing required in a number of projects.

Audits

The PCR Section has conducted both internal (Section) and external (permittee) assessments during 2011. The internal assessments evaluated staff implementation of administrative record keeping and permit processing requirements and are facilitated by utilizing the PCR Section database. External assessments consisted of site inspections, technical reviews of project designs, engineering and water quality data, and annual reviews of the South Florida Everglades Report (SFER). Results of these assessments were discussed with staff and our permittees to ensure a timely response to any results that were considered less than adequate.

Tracking Tools

The PCR Section Database is an integral tool in ensuring QA/QC throughout the Section's various activities and revisions to this Database were a priority during 2011. The PCR Section Database allows for the tracking of permit applications, modification, requests for information, authorization requests, time extensions and renewals, review requests for reports and planning documents, critical milestones, and compliance deliverables. The Database is also used to create reports for tracking the permitting process, party responsible, informal and formal submittals, review times, field inspections, compliance, and project milestones. These reports create a weekly "snapshot" of pending deadlines which helps to prioritize Section activities. The database also houses a "QA Checklist" which assists staff in ensuring all relevant permitting and administrative record keeping tasks for each permit action have been completed. In the future, this will allow for Section staff to conduct internal audits of permit files. The PCR Section is continually reviewing and updating our tracking process in an effort to streamline record keeping and tracking sheets. Coordination with GIS staff in the Watershed Data Services Section is ongoing to develop a GIS tool to track land purchased with Save Our Everglades Trust Funds.

Field Compliance

Site inspections are conducted by PCR Section staff in West Palm Beach and are tracked in both field files and the PCR Section Database. Maintaining a compliant status on the ground during project implementation and construction is achieved through efficient and consistent communication and collaboration with the permittee and contractors to resolve challenges and through maintaining a professional relationship with project managers and a consistent presence at the project sites. Site inspections resulted in the observation of several issues including: minor contamination, wetland impacts, excessive turbidity, faulty erosion controls, etc. No findings of violations (i.e. resulting in a compliance and enforcement action) were issued due to the diligence of permittee, on-site project management and site inspector diligence in ensuring the timely correction of observed issues.

Administrative Compliance

The PCR Section performs weekly, monthly and annual administrative assessments for all active permits regarding deliverables, process milestones and compliance actions. Weekly and monthly “assessments” primarily rely on tracking performed by the individual permit leads through the PCR Section Database. Annual audits are primarily done through review and interaction with the permittees as part of the annual South Florida Environmental Report (SFER). The SFER is a comprehensive three volume publication, which focuses on major updates and accomplishments over the reporting year. The report is divided into three volumes which satisfy the annual reporting mandates required by federal and state regulations and to comply with various permit related regulatory and reporting requirements consistent with the CERPRA, EFA, NEEPP and ERP restoration projects. Because the report serves the public and decision makers with information on the advances toward South Florida’s environmental restoration, an annual review of the SFER is conducted by FDEP staff including staff from the PCR Section and RPPMS. In addition to ensuring that regulatory requirements are met, all chapters which address CERP, EFA or NEEPP projects are reviewed prior to signature by the Secretary.

Development of a Stormwater Treatment Area Discharge Monitoring Report tracking tool is currently underway and is in the experimental phase of application. This tool allows staff to track both flow and total phosphorous concentration monthly relative to the period of record for a particular storm water treatment area, provide summaries needed to review annual reports and identify periods of increased flow and/or total phosphorous concentration. Potential modifications of this tool could include calculation of load, compliance with the technical water quality based effluent limit, total phosphorous removal efficiency, etc.

Technical Support

Engineering staff within OEP conduct a variety of tasks to support permitting staff such as technical reviews of design plans, specifications, reports, calculations, operations plans and environmental protection plans, including dewatering plans, submitted through the permitting and compliance process. In addition, water quality staff conducts a variety of tasks within the PCR Section and OEP. These tasks include supporting permitting staff with technical reviews of surface water quality monitoring plans, monitoring reduction requests, toxicity testing, water quality compliance, review of SFER chapters, and water quality data contributing to the SFER. Engineering and water quality staff also provides support to the RPPMS throughout the planning process to ensure that sufficient supporting information and design assumptions, etc are taken into account prior to applying for regulatory authorization.

Technical support staff participates in meetings and workshops in an advisory capacity. Water Quality staff are involved in the program level activities such as the CERP Quality Assurance Oversight Team (QAOT), which is a multi-agency team, directed by the CERP Guidance Memorandum 41.01 and whose primary objective is to provide guidance on quality assurance and quality control issues for both CERP projects and programs. Engineering staff participate on interagency teams related to specific projects such as Technical Review Briefings and for the modification or development of technical design criteria. .

Issues/Corrective Actions

As part of our 2011 Section activities, no major issues (i.e. items requiring corrective actions) were observed, however, the following areas have been identified as needing improvement:

- Further development of our Database tools to maximize its use for analyzing and tracking performance measures, record keeping and ensuring programmatic consistency.

- Placing more of an emphasis on regular internal trainings to expand and build on staff expertise in varying program areas and to facilitate a broader knowledge base.
- Introduction of structured internal audits.
- Continued improvement and updates to Section SOPs and Guidance Manuals.
- Development and implementation of a Section specific compliance manual to ensure consistency, address roles and responsibilities of field vs. administrative staff responsibilities and memorialize SOPs.

The PCR Section is currently working through file transfers from the FDEP Southeast District Office which were transferred to PCR Section during the 2011 reorganization to OEP. Prior to receiving these items, no QA/QC issues were detected based on our regular internal assessments of active permits in-house. As staff complete the transfer of files and individual file assessment, we expect that some issues may arise regarding file transfers from the Southeast FDEP District Office due to differences in record keeping practices and tracking techniques. It is expected that once this initial merge is completed, future tracking efforts will conform to Section needs and allow for more rigorous review of active permit status and compliance.