

2011 Annual Quality Assurance Report Southeast District



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2011 Annual Quality Assurance Report

Southeast District

Overview

The mission of the Department of Environmental Protection (DEP) Quality Assurance (QA) Program is to ensure that the environmental sampling and analysis data received by the Department is appropriate and scientifically sound and that the proposed procedures are designed to produce data that are reproducible, comparable, reliable, representative, and defensible within known limits of precision, accuracy and sensitivity. The DEP's QA requirements for analytical laboratories and field activities are codified in Chapter 62-160, Florida Administrative Code.

The DEP Southeast District (SED) compiled the 2011 Annual Quality Assurance Report with assistance from the SED Waste, Water, and Ambient Water Quality Monitoring Programs. This report explains the process, criteria, generation and usability of data, and staff assignments by which QA is managed in the SED. This report will serve as the initial SED QA document, act as a training tool and a reference for future reporting, and as guidance to SED personnel.

The creation of this report involved numerous steps including participation in statewide QA discussions and trainings, SED Program specific meetings and field tests, review of data and documents, utilization of quality control databases, audits of locally delegated regulatory programs, and conducting laboratory inspections. The SED QA oversight also involves a permit review process conducted by compliance and enforcement staff to ensure internal consistency, proper sampling and reporting locations, utilization of appropriate methods and requirements, and that all templates are updated and correct.

The QA process will ultimately serve as a compliance assistance tool between the SED and regulated entities. Implementation of the SED QA initiative will act as an outreach effort by promoting report consistency and encouraging laboratory form standardization. The SED QA oversight will be continually reported through future Annual SED QA Reports to the DEP Standards and Assessment Section. Future reports will track the QA progress across the SED Programs and will lead to improvements in data management overall Quality Assurance.

SED 2011 QA Progress Summary

Each SED Program conducted monthly staff meetings and statewide teleconferences to update and refine QA training. There were 2 specific classroom and field training events for all District staff provided by the DEP Standards and Assessment Section in March 2011 and a QA Rule Workshop in October 2011. The SED Water Facilities Program held 5 program-specific training events and the SED Ambient Water Quality Sampling Program held 2 training events. The SED Solid and Hazardous Waste Sections trained staff on the use of ADaPT software for data evaluation and data/documents received or generated by each SED Program were routinely reviewed for conformance with QA requirements.

The QA initiative has become a regular part of SED inspection work examining sampling locations, methods, frequencies, and equipment. Furthermore, SED staff followed the QA principles while conducting audits of 12 locally delegated regulatory programs and 4 Performance Audit Inspections of local laboratories to verify quality control.

The SED Water Facilities Program continued its initiative to audit the reports of 230 facilities to correct templates or submitted data as needed. This Program also implemented a new QA step in permit processing by having compliance/enforcement staff review and edit permits before issuance. This process improves internal language consistency, proper sampling and reporting locations, and use of appropriate methodology and compliance reporting requirements.

Several common concerns were identified for all SED Program including varying levels of experience and expertise in QA, the need for continuous training with staff turnover, better oversight of delegated QA initiatives, and the desire for tools and ongoing discussion to standardize QA activities. Additionally, improper reporting or poor data quality in reports submitted by regulated entities has been an ongoing problem that has been addressed through compliance assistance, but further outreach is needed. The ADaPT data evaluation software could be expanded, but Rule revisions may be necessary to require reports to be submitted in the proper electronic format to allow direct data importation.

The SED will continue to address QA concern areas across all Programs. The SED Programs will promote improvements in consistency and quality of data reports by encouraging standardized formats among laboratories. Staff will continue training regulated entities through one-on-one compliance assistance and through group outreach efforts such as sampling workshops. Audit cycles for delegated programs will continue with special attention to QA programs and resulting data quality, and attention will be placed on identifying QA training needs and implementing corrective actions.

Waste Management Program

Department Rules require entities regulated under the Waste Management Program's Solid Waste and Hazardous Waste Sections to submit water quality data in an electronic format that can be imported directly into the Department databases. The Waste Management Program imports data to ADaPT, a Microsoft Access 2010/2007/2003 application that measures the integrity and quality of an electronic data deliverable (EDD) based on elements needed for data validation and assessment. The ADaPT application is the Program's primary data quality assessment tool for Solid or Hazardous Waste data (please see attached description).

Training

- Training for all staff in the QA requirements contained in applicable Rules.
- ADaPT training for staff when assigned applicable duties, updated as needed.
- The Solid Waste Section has developed on-line intranet videos to explain and provide examples of the ADaPT and EDD process.
- Monthly staff meetings update and refine training on QA issues as they arise.

Audits and Ongoing Quality Assurance

- Data and documents generated by Program staff are routinely reviewed for conformance with QA requirements.
- Data electronically submitted to Solid Waste or Hazardous Waste Sections is automatically evaluated by the ADaPT system.
- The Waste Cleanup Section has begun using ADaPT, although electronic submittal is not yet mandatory.
- Routine Compliance Evaluation Inspections evaluate the regulated entities' QA. The Hazardous Waste Section uses a checklist format specific to the Federal Resource Conservation and Recovery Act.
- Compliance assistance has been provided to regulated facilities regarding Department QA requirements.

- Compliance assistance was provided to reporting facilities when Quality Assurance issues were identified during review of their required submittals (Monthly Operations Reports, chemical data, bacteriological data, groundwater sampling logs, data interpretation, etc.).
- The Program conducts biennial audits of the Solid Waste Section's delegated agencies in Palm Beach, Broward, and Miami-Dade County, and annual audits of the Storage Tanks Section's contracted authorities in all 6 District counties. These are very detailed audits of the Quality of implementation of requirements and objectives for the delegated or contracted programs.

Issues

- Reporting consistency between laboratories needs to be improved.
- The Waste Cleanup Program may need rule revisions to enable uniform use of ADaPT by requiring electronic data submittal that meets DEP criteria.

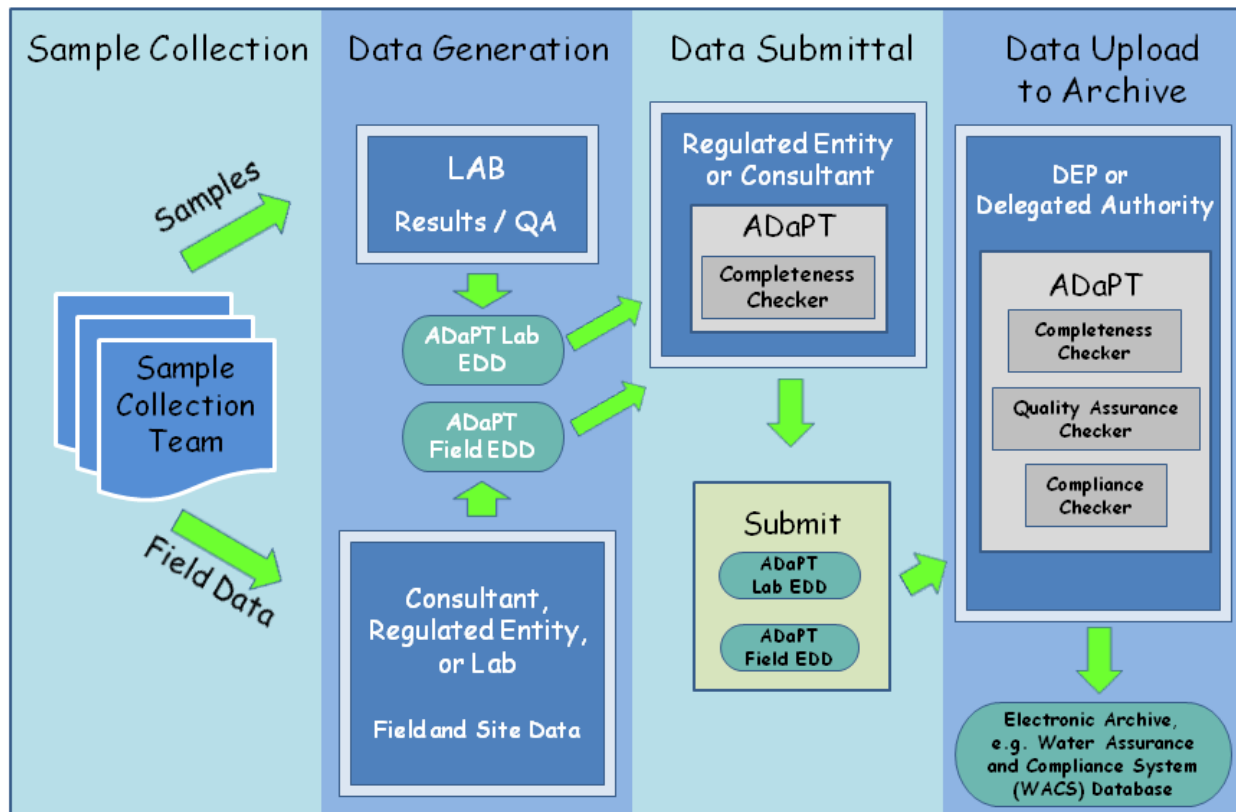
Corrective Actions and Goals for 2012

- Improve the consistency and quality of submitted lab reports by encouraging adoption of an informal "industry standard" report format.
- Reduce labor demands and improve data quality by continuing to expand the use of ADaPT to more Program Sections.
- Continue to increase awareness of, and attention to, QA issues and procedures among staff and in the regulated community.

Waste Management Attachment 1: ADaPT

FDEP ADaPT is a Microsoft Access 2010/2007/2003 application that measures the integrity and quality of an electronic data deliverable (“EDD”) based on elements needed for data validation and assessment.

Process flow diagram showing the ADaPT user process.



The ADaPT software has the capability to create customized project libraries set up by the user (i.e., laboratory, project manager, data generator, governing entity, or partnership between any of these groups) to validate the data using their own specific requirements. The program areas have created a master library based on Rule 62-777 and 62-160, F.A.C. requirements. The ADaPT libraries establish analytical methods, target analytes and quality control and data review requirements for any project.

The EDDs include the Laboratory Data Deliverable (“LDD”) and the Field Data Deliverable (“FDD”). The LDD contains sample result information and also includes all associated quality control. The FDD contains sample collection information contained in the field sampling log and associated Water Assurance Compliance System (“WACS” database) Project (facility) Monitoring Testsite Inventory.

The Waste Management Rules in the Florida Administrative Code (“FAC.”) specify that certain QA information be submitted in the EDDs. Rules in the FAC that contain specific QA information submittal include, but are not limited to :

- Rule 62-160.341, Record Keeping and Reporting Requirements for Lab Procedures
- Rule 62-701.400, Landfill Construction Requirements (Solid Waste).
- Rule 62-701.510, Water Quality and Leachate Monitoring Requirements (Solid Waste).
- Rule 62-730.225, Requirements for Remedial Activities (Hazardous Waste).
- Rule 62-770.400, Quality Assurance Requirements (Petroleum Site Cleanup).
- Rule 62-780.300, Quality Assurance Requirements (Contaminated Site Cleanup).
- Rule 62-782.300, Quality Assurance Requirements (Drycleaning Solvent Cleanup).
- Rule 62-785.300, Quality Assurance Requirements (Brownfields Site Cleanup).

ADaPT assesses the data in the EDDs to measure the quality of all analytical results. ADaPT ensures that laboratory analytical results and associated information (such as method and analyte names) reported in an EDD adhere to a set of standards defined by a particular project or agency, and compares holding times, blank contamination, lab quality control, accuracy, and precision information reported in the EDD against the established criteria.

If data problems or outliers exist, ADaPT will qualify the associated sample results depending on the magnitude of the outlier.

ADaPT eliminates opportunities for errors to be introduced during data evaluation and management. It does so by utilizing direct electronic submittal of data by the regulated entities, preventing transcription errors due to manual data entry into one or more data management applications. ADaPT also greatly reduces labor demands and processing time, and eliminates numerous opportunities for data deficiencies to be overlooked due to an inspector’s inexperience or an overwhelming volume of data.

Water Facilities Regulation Program

Drinking Water

The Drinking Water Program directly monitors and inspects the regulated drinking water facilities in St. Lucie, Martin, and Okeechobee Counties. Regulated drinking water facilities in Palm Beach, Broward, and Miami-Dade Counties are delegated to the Health Department in each county, and DEP oversees those programs.

Training

- March 15-16, QA training at District by DEP Standards and Assessment Section.
- Informal Training and updates provided during monthly Staff Meetings.
- Frequent discussions within District and with Tallahassee on specific QA issues.
- One on one training as needed.

Audits and Ongoing Quality Assurance

- Data submitted by the water suppliers or operators is routinely evaluated to ensure that the data meets all QA requirements.
- Data Usability determinations are made for each water provider.
- Support is provided to the water providers and operators with QA issues (data collection, reporting, etc.).
- Annual Program Evaluations (audits) were conducted for all delegated Drinking Water Programs in the District (Palm Beach, Broward, and Miami-Dade County Health Departments). These were very detailed audits of the quality of implementation of requirements and objectives for the delegated programs.
- Compliance assistance was provided to water providers or operators on QA items revealed during reviews of their required submittals (Monthly Operations Reports, chemical data, bacteriological data, etc.) and during regularly scheduled Sanitary Surveys and Compliance Inspections.
- Compliance assistance was also provided to the laboratories when evaluating QA items on their laboratory reports (most commonly, issues with data qualifiers and rule requirements).

Issues

- Further training is needed in some of the elements of the Quality Assurance requirements of DEP by Drinking Water staff.
- Reporting consistency between laboratories needs to be improved.
- Lack of identification or description of some of the data qualifiers from the laboratories. Lack of understanding of what these data qualifiers mean by water providers or operators.

Corrective Actions and Goals for 2012

- Revise Drinking Water QA Plan to incorporate more detail for each activity.
- Provide more QA Training to staff during staff meetings.
- Develop QA procedures/guidance documents for District data evaluation, management, and archiving.
- Develop training and guidance documents for data reporting for the water providers and operators (including laboratory consistency).
- Work to standardize reporting consistency among laboratories.
- An audit process is in development to evaluate the Drinking Water Well Construction Program delegated to the South Florida Water Management District. Some QA issues have been identified that are planned to be remedied by developing procedures and forms as well as increased levels of training.
- Document all program QA activities.

Wastewater

Wastewater is divided into Permitting and Compliance/Enforcement subsections. QA is primarily a function of the Compliance/Enforcement group.

Training

- February 12, Performance Audit Inspection Training provided by Terry Davis, SED Water Facilities Sampling Coordinator.
- March 15-16, QA training at District by DEP Standards and Assessment Section.
- May 4-5, WAFR Training on database management.
- October 18, QA Rule Workshop in District.
- October 25-27, EPA training in District on sampling and inspection methods.
- October 28, ocean outfall toxicity analysis auditing and interpretation.
- November 17, webcast training on Concentrated Animal Feeding Operation Rule, including data requirements.
- Monthly internal Compliance/Enforcement staff meetings update and refine training on QA issues as they arise.
- Monthly statewide teleconferences (Domestic Wastewater, Industrial Wastewater, and Compliance/Enforcement workgroup teleconferences) update and refine guidance on QA issues as they arise.

Audits and Ongoing QA Activities

- October 25-27, EPA conducted an audit of District sampling and inspections.
- Discharge Monitoring Reports are submitted monthly by 258 facilities industrial or domestic wastewater facilities, and 56 facilities also submit Monthly Operating Reports for their injection wells. These reports include up to 88 parameters requiring daily, weekly, or monthly sampling, and additional data reports are required at other intervals (please see attached list). Each report is reviewed by staff for conformance with DEP SOPs and requirements, and facilities are made to correct any deficiencies and resubmit the reports (please see attached QA review checklist for DMRs and Other Reports).

- Data from submitted reports is reviewed a second time as it is entered into various databases either manually or by direct electronic submittal. The electronic submittal system, eDMR, rejects report submittals that contain deficiencies or do not meet DEP requirements for reporting. Staff entering data manually from submitted reports also reject reports with deficiencies. Facilities are required to correct and resubmit rejected reports.
- Compliance/Enforcement staff has been conducting an intensive program of compliance assistance to help facilities correct their sampling, analysis, and reporting errors and deficiencies before enforcement action becomes necessary. This has resulted in great improvement in the quality of information in report submittals and in DEP's databases.
- Performance Audit Inspections ("PAIs") were conducted at 4 laboratories (contract laboratories commonly serve multiple facilities). A PAI examines the documentation for selected samples from collection through final disposal, such as chain-of-custody, equipment calibration records, analysis data, and lab methods used.
- Compliance Evaluation Inspections were conducted at 149 of the facilities that are required to report data. The inspections include evaluation of sampling locations, methods, equipment, and frequencies, along with documentation of sampling and analysis (please see attached Partial Inspection Checklist).
- Drafted permits are reviewed by Compliance/Enforcement staff before issuance. The reviews check for the permits' internal consistency, appropriate locations and designations of required sampling locations, and correct formatting of the DMR template to be issued with the permit under review. This part of the review checks every typographical space in the template to ensure the accuracy of parameter codes, correct sample location names, proper sample types and frequencies, proper effluent quality limits and measurement units, and consistency with the body of the permit in all details.

Issues

- Inspectors have not all had the same level of expertise in the details of proper sampling methods and equipment, holding times, analysis methods, detection limits, and other QA issues. Less experienced inspectors with no lab background may have only minimal knowledge these things.
- QA evaluations should be done consistently from one inspector to the next.

- Many facilities have errors in the DMR templates issued with their permits.
- Facilities have become accustomed to DEP's past tolerance of a certain laxity in how data was reported, for example, the use of "U" to represent analysis results below method detection limits. Facilities continue to submit reports with deficiencies, and although DEP staff may know what the facility meant, improper submittal can no longer be accepted due to QA and electronic database requirements.
- Data shortcomings in past reports were sometimes not completely addressed, due to insufficient QA practices. This makes portions of DEP's databases less reliable for analytical work or compliance determinations.
- Limited personnel resources for the workload make it difficult for Compliance /Enforcement staff to balance competing demands and priorities.
- The SED has not yet fully evaluated the QA elements of the three agencies delegated to carry out DEP's Wastewater Facilities Regulation in the Southeast District. These agencies are delegated to regulate only facilities not subject to National Pollutant Discharge Elimination System (EPA) requirements.

Corrective Actions and Goals for 2012

- An internal training program is being implemented to increase the depth of knowledge each inspector has about the details of proper sampling practices, accepted analysis methods, interpretation of data reports with respect to lab qualifier codes, method detection limits and practical quantification limits. Training will be provided by staff members who specialize in these areas.
- Consistency in evaluating data quality is supported by checklists designed to serve multiple purposes for inspections and audits. These checklists are living documents updated continuously to reflect emerging issues and QA refinements.
- Errors in DMR templates must be corrected by Permitting staff. An expedited procedure has been implemented to issue such corrections without the time delays of issuing more extensive permit revisions. Compliance/Enforcement staff informs Permitting when a DMR template error is found, and Permitting normally issues a correction within a few days.
- In addition to the one-on-one compliance assistance that is provided to facilities with QA issues, staff is developing outreach efforts to address frequently-encountered QA issues. Some of the outreach efforts underway are a presentation at the annual Focus on Change workshop sponsored by Florida

Rural Water Association, and short articles that could be delivered via newsletter or periodical columns.

- Compliance/Enforcement staff are addressing database QA by requiring facilities with poor data quality to resubmit reports for data generated from January 1, 2010 to the present. Upon resubmittal, the corrected data is entered into DEP's databases.
- Supervisors and staff specializing in QA, data management, and sampling and analysis will continue to refine procedures and checklists to ensure QA is integrated QA into all Compliance/Enforcement activity (inspections, data entry, review and analysis of reports, etc.), and is documented. The goal of this effort is to consolidate and streamline practices and procedures to enable staff to sufficiently address all the Department's needs.
- Delegated programs are audited by DEP every 3 years, and will be due for the next audit in the 2012-2013 fiscal year. During the first part of calendar year 2012, Compliance/Enforcement staff will prepare materials to incorporate greater evaluation of the QA elements of the delegated programs into the audits.

Wastewater Attachment 1: Routine Types of Wastewater Monitoring Reports

Name	Report Frequency
Discharge Monitoring Reports (domestic, industrial)	monthly
Monthly Operating Reports (injection wells)	monthly
Groundwater Monitoring Reports	facility-specific: quarterly, annually, etc.
Toxicity Bioassays (surface water dischargers)	facility-specific: quarterly, annually, etc.
Wastestream Analysis (injection wells)	annually
Reclaimed Water/Effluent Analysis (domestic)	annually
Biosolids Analysis (biosolids)	facility-specific: quarterly, annually, etc.
Agricultural Use Summary (biosolids)	annually

Wastewater Attachment 2: QA Checklist for DMRs and Other Reports

WWTF NAME, FACILITY ID, INSPECTION TYPE & DATE

	Y	N
1. DMR form submitted has the most current version of every page, including DMRs from permit mod.s.		
2. Permit text and DMR form agree in all details (PARM codes, monitoring sites, etc.), including mod.s.		
3. Form submitted matches DEP-issued form in every detail (PARM codes, monitoring sites, etc.).		
4. Submittal is timely and complete: all pages were filled out and submitted.		
5. Font or handwriting is legible (font size large enough, ink dark enough, not smudged or too sloppy).		
6. All header information is correct: name, ID#, Mon. Group, period, etc. as required.		
7. Each page is correctly labeled: name, ID#, period, and report type or data type, or as required.		
8. Signed (if required) by proper agent, agent's name/title are printed, and signature date is appropriate.		
9. All blanks are filled in as required with data or proper codes; missing data is explained.		
10. Data qualifier codes used are correct: for DMRs, use DMR codes, not lab codes.		
11. The correct parameters are reported: CBOD vs. BOD, % undetectable vs. 90 th percentile, etc.		
12. Sampling frequencies in daily data (DMR Part B) are as required: bimonthly vs. every 2 weeks, etc.		
13. Data is <u>reported</u> at frequency required: samples may be quarterly but reports required monthly, etc.		
14. Periods are consistent, not variable: a "day" is midnight-midnight, a "week" is Sunday-Saturday, etc.		
15. Parameters with minimum and maximum limits have a min. & a max. reported for each period.		
16. Data are reported in the proper units: mg/L, µg/L, ntu, etc. Toxicity reports show "<" or ">" properly.		
17. Decimal places reported are appropriate for the permit limit, MDLs, PQLs, and math operations.		
18. Data appears to be in the appropriate range and outliers are explained. Outliers are uncommon.		
19. Results below detection limits are reported as "<" MDL ("Method Detection Limit") or as required.		
20. Any indicated MDLs and Practical Quantification Limits are appropriate for the permit limit.		
21. Analysis results below detection limits are properly represented in calculating totals and averages.		
22. Geometric means and arithmetic means are calculated and reported as required.		
23. Calculations are done correctly and the correct #s are used for divisors when averaging.		
24. Totals, means, min/max for daily data (DMR Part B) agree with summary data (DMR Part A).		
COMMENTS:		
Reviewer:		

Ambient Water Quality Monitoring Program

Currently all of the SED-Sampling Projects are conducted as part of the Strategic Monitoring Plan (SMP), Total Maximum Daily Load Program (TMDL), or Nutrient Gradient Study.

Sampling is done to either verify that a water body is impaired, or the data is used to delist the water body from the Impaired Waters List. The Plan of Study is covered under the Impaired Waters Rule & SOP's. The SMP designates the number of samples desired and any seasonal requirements there might be for the sample to be taken.

Training

- All SED-Ambient Section Team Members are required upon their employment to sign a form that verifies they have read, and can understand, the Standard Operating Procedures ("SOPs"). They must also read and understand any subsequent changes to the SOP's as they occur.
- Team Members must also read The Field Sampling and Quality Manual, and sign another verification form.
- New Team Members are trained by personnel that have successfully completed either the Watershed Monitoring Sampler Workshop, or attended TREEO training.
- March 15-16, QA training at District by DEP Standards and Assessment Section.
- August 3, Plant Identification Training and Update, classroom and field.
- October 27, QA-QC conference Call.

Audits and Ongoing Quality Assurance

- April 26-28, Lake Vegetation Index Training & Proficiency Exercise, Wekiwa Springs, conducted by the Standards and Assessment Section.
- October 31, Total Maximum Daily Loading Field Sampling Audit.

- Currently all field sampling operations, preservation & holding times are followed DEP-SOP-001/01. All record keeping and reporting requirements are being done per Chapter 62-160.240.
- Periodic Field Sampling Audits are being conducted.
- In-house review of collected data is done monthly, normally just prior to upload.
- One extra sampling event is scheduled for each scheduled water body in the event a site cannot be sampled due to construction or dry conditions, or loss or delay of coolers in shipment. Bottle sets are ordered through the Tallahassee LIM's system.
- Extensive verification is done for documentation of sampling events and the data they generate (please see Ambient Water Quality Sampling attachments).

Ambient Water Quality Sampling Attachment 1: Data Tracking

- Field sheets are checked for accuracy and inclusiveness, and marked on the Data Tracking Sheet as complete. Any discrepancies are logged and tracked.
- The Strategic Monitoring Plan is updated as to the completion of the sampling run, and number of samples retrieved.
- Collected field data is updated in our Excel Waterbody ID (“WBID”) file.
- The data is entered into DEP’s Laboratory Information Management System (LIMS) within 3 business days of the sampling date. The Date, Time and Initials of the Person entering the data is recorded on the SED-Data Tracking Sheet.
- The entered data is then printed as a spreadsheet, and compared to the Field Data Collection sheet for verification. If an inconsistency is found, a line is put through that data point, with the correct information written next to it.
- Corrected data is entered into the LIMS and the person entering the corrected data initials next to the data point on the data printout. The data is then marked as verified in the LIMS and on the SED-Data Tracking Sheet.
- A text file of the data is created using the Job ID Number.
- Lab qualifier codes are logged and tracked, with the appropriate RQ number, in the Excel WBID file and the Data Tracking Sheet.
- The corrected printout is compared to the Field Sheets, and can only be marked as validated by either the Team Supervisor or Lead Sampler. The Date, Time and Initials of the Person validating the data is recorded on the Data Tracking Sheet.
- After validation, the text file of the data is uploaded into the SIM tool, and the import# and the Date, Time and Initials of the Person uploading the file are recorded on the Data Tracking Sheet.
- The SIM tool checks for errors, and if no errors are found the data is migrated to STORET. Any errors are corrected and the corrected data migrated to STORET.
- After data migration, the SED – JOB ID Number and the Date, Time and Initials of the Person migrating the data is recorded on the Data Tracking Sheet.
- Finally, the text file of the data is moved from the current project year’s STORET folder to the main STORET Folder on the X-Drive for Storage and Back-up.