



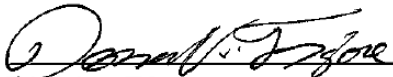
Quality Plan for the DIVISION OF RECREATION AND PARKS (FLORIDA PARK SERVICE)

Florida Department of Environmental Protection

December 19, 2012

Signature Page

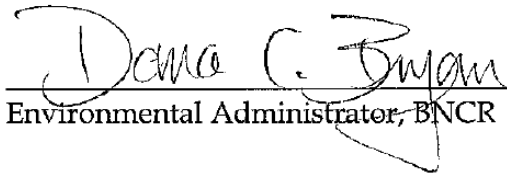
The undersigned have read and understood this Quality Plan, are charged with managing and improving the quality system, and are responsible for ensuring that all staff properly execute the procedures discussed in the plan.


Division Director

12-31-12
Date


Chief, Bureau of Natural and Cultural Resources

12/14/12
Date


Environmental Administrator, BNCR

12/19/12
Date

Introduction

The DEP 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 are of sufficient quality to support Department decisions. The effectiveness of the Division of Recreation and Parks (DRP) QA program is dependent upon the actions of all DEP staff, from “front line” employees to management, meaning QA is a function distributed throughout the organization. One aspect of DRP’s program is to ensure that Department QA activities are carried out according to commitments made to the Environmental Protection Agency as enumerated in the DEP Quality Management Plan (QMP) (2011).

The DEP Secretary is committed to implementation of the quality assurance requirements in the QMP and as authorized at Section 403.0623, F.S., and Chapter 62-160, F.A.C. (the DEP QA Rule). It is the Secretary’s intent to carry out these obligations and requirements as described in the Department’s QA Directive (2009).

The Division of Recreation and Parks manages the Florida Park Service, which is a land management agency administering 160 state parks and 11 state trails and greenways on about 792,000 acres. State park management includes the planning, design, construction, and repair of modern facilities; the restoration and conservation of 74 different native Florida biological community types in multiple locations; preservation of hundreds of historical structures and archaeological sites; and the administration of visitor services and interpretive programming for 20 million state park visitors annually (2010).

Land stewardship involves the collection and interpretation of a great variety of information. However, none of the information collected in the day-to-day activities of state park staff are used for regulatory purposes or could ever be expected to be used in legal proceedings. Rather, DRP is an entity that is regulated and is subject to the QA programs of those regulators.

Consequently, the Quality System of the Florida Park Service is limited to: 1) the collection and transport by staff of water samples for water quality testing of public-use wells, wastewater systems, and swimming areas; 2) the daily staff testing of chlorine and pH levels in some public use wells; 3) the oversight of outside contracts for the testing of these same systems; and 4) the collection of ecological data by staff and volunteers for imperiled species monitoring, where a multi-agency database has established protocols to increase the validity of

collected data. Other kinds of ecological data collected by DRP biologists and other staff have sufficient quality assurance for the purpose of the individual project, but they are too diverse and task-specific to be logically included within a QA system.

Basic Elements of the DRP Quality Plan

The DRP Quality Plan explains both the process and criteria by which the quality system is managed. The plan is utilized as an instrument of internal communication to inform staff of current and future quality assurance activities. It discusses how specific QA duties are assigned to responsible staff. DRP will revise the Quality Plan as needed, and will ensure the consistent application of procedures and criteria for the generation or use of data subject to this plan. The Quality Plan will also be used as a training document for new staff and as a reference for experienced personnel. The plan and its revisions also serve as an archival record of DRP's formal quality system.

The elements of the DRP plan are consistent with the Department's Quality Management Plan, Quality Assurance Directive, and Quality Assurance Rule (Chapter 62-160, F.A.C.). DRP expects all staff and volunteers involved in the data collection falling within the scope of the Quality System to read, understand and follow the procedures and criteria as discussed in this plan, and to carry out their assigned responsibilities for effective utilization of the quality system.

Policy Statement

It is the Division of Recreation and Parks' policy to:

- Ensure that water quality data used to demonstrate compliance with public use regulations (drinking water and swimming beach standards) are collected according to County Health Department protocols, which themselves are designed to comply with DEP and DOH QA standards.
- Ensure that performance-based septic systems and aerobic treatment units (ATUs) are tested in compliance with DEP and DOH QA standards.
- Ensure that ecological data for imperiled species monitoring that will be sent to multi-agency databases are collected according established protocols when they exist.
- Adaptively manage the DRP Quality System to be consistent with provisions of the DEP Quality Assurance Management Plan.
- Ensure that each staff or volunteer who participates in data collection within the scope of this Quality System is properly trained to execute their assigned functions.

- Implement quality assurance procedures for the management of the data repositories.

Ethics

All employees of the DEP Division of Recreation and Parks are held to high professional ethical standards in the performance of their duties. All employees are required to read and understand DEP Directive 202 “Code of Ethics”, 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. Improper, unethical or illegal actions will be dealt with according to the published Administrative Directives of the Florida Department of Environmental Protection.

Organization and Responsibilities

The DRP Quality Assurance System resides within the Division of Recreation and Parks’ Bureau of Natural and Cultural Resources and is partially delegated to 5 District Offices around the state. The function of the Bureau of Natural and Cultural Resources is to provide direction and leadership to the Division in the scientific and technical aspects of land management. The District Offices provide direction to thirty-odd individual state parks within the district boundaries. DRP’s Quality Assurance Officer (QAO), Dana C. Bryan, coordinates and participates in the quality evaluation of program data, and provides oversight to ensure that staff perform their QA functions.

Responsibility is delegated to District Office staff in two categories. Water quality sampling/testing and performance-based septic system oversight is delegated to an administrative or environmental staff member designated in each district office. Ecological data oversight is delegated to an environmental staff member designated in each district office.

The QAO also ensures that corrective actions are implemented for data collection that is inconsistent with established protocols. Additionally, the QAO assists program managers in the development of the Quality System and other logistical aspects of its implementation, such as coordinating associated training needs.

The DRP QAO documents all program QA activities, including training and corrective actions and provides this information to the DEP Standards and Assessment Section on a periodic basis.

DRP staff routinely carry out the following duties involving water quality sampling, water quality testing, and certain ecological data collection:

1. In most cases, local county health departments (CHDs) collect and test water samples from state park swimming beaches and potable water wells; however, in some cases DRP staff collect the water samples and deliver them to the CHD or private labs for testing. Sampling protocols and equipment are provided to staff by the CHD or the private lab. In some cases, chain-of-custody records for samples are maintained by the lab. All sampling information and results must be on the proper forms with time, date, and collector information completed. When DRP uses purchase requisitions to contract these services through MyFloridaMarketPlace, the DEP purchasing section automatically includes a QA template provided by DEP's Bureau of Assessment and Restoration Support. Private labs are subject to CHD and/or DEP or DOH QA oversight. A few parks have swimming pools that are open to the public. The parks are required by law to have a certified pool operator on the premises each day that the pool is in operation. All tests performed are by the pool operator, following guidelines set by the CHD.
2. Individual parks with potable water wells use staff or contractors to collect and analyze chlorine levels using over-the-counter commercial testing kits. Logs are maintained in the well pump-house, and other procedures are followed, as specified in the well's Operations and Maintenance Manual, all of which is regulated by the CHD. DRP does not have any internal written procedures specific to these activities, but just follows DEP, DOH, and NELAP (National Environmental Laboratory Accreditation Program) guidelines and standards. Parks check and calibrate their meters regularly according to permit standards written in DRP's Standard Operating Procedures Manual for drinking water and wastewater treatment facilities.
3. Individual parks with wastewater treatment plants, performance-based septic systems, or ATUs contract testing of septic water to comply with permits from DEP, which are written to the QA requirements adopted by DEP or DOH. In the past, DRP employed its own wastewater treatment plant operators who conducted the mandatory testing, but all these positions have been eliminated.
4. Ecological data for imperiled species monitoring that subsequently will be sent to multi-agency databases are collected by staff and volunteers according to protocols written by the coordinating entity (e.g., Florida Fish and Wildlife Conservation Commission (FWC) for marine turtles).

All these data collection efforts follow protocols established by other agencies or entities. Corrective actions will be directed by the DRP district QA designees when irregularities in data collection are discovered.

Regarding ecological data mentioned in #4 (above), there are two monitoring efforts with protocols underway. State parks with Florida scrub-jays monitor their populations according to a protocol described in the 2012 Jay Watch Volunteer Training Manual published by The Nature Conservancy, updated by Audubon of Florida, and administered by FWC. The protocol includes survey methods, a band-reading protocol, data sheets, and data recording procedures; a vegetation monitoring protocol; and various other standardized instructions for activities used to manage scrub-jay populations. Classroom and field training are required for participation. All data from participating survey sites are submitted to Jay Watch Site Leaders and the Audubon of Florida statewide coordinator. FWC maintains a statewide database and Audubon of Florida issues an annual report that summarizes annual data and provides multi-year trends.

Many coastal state parks monitor marine turtle nesting under a permit by FWC and follow FWC's Marine Turtle Conservation Guidelines. Nesting Beach Surveys are the most common activity and strict protocols are published for training, conducting surveys, interpreting crawl characteristics, recording data, measuring specimens, conducting in-nest inventories (and collecting other data under special permit), nest-marking, instituting predator control, and filing reports on standardized forms.

If and when other multi-agency protocols are established in the future and DPR chooses to collect similar data, those protocols will also be added to the DRP QA System.

- QAO Dana Bryan acts as liaison with other units, data providers, data consumers or other external parties concerning QA matters.
- QAO Dana Bryan answers public or external technical inquiries about data interpretation, approved procedures, suspected QA problems, site-specific issues, etc.

Training

All personnel are properly trained to perform their duties. Supervisors periodically assess whether DRP's staff performance conforms to the policies and procedures of DRP.

DRP's training procedures consist of:

- Training for specific QA functions

- For water quality testing (beaches and potable water wells), field instruction and written protocols are provided by local CHDs at their discretion and reinforced at the time of annual inspections. Further training by DRP is prescribed as determined by the district coordinators in special circumstances.
- For water quality testing in wastewater treatment plants, the work is done by certified operators. Testing of performance-based septic systems and ATUs is done by contract. Protocols for this testing are still evolving with these new types of systems, and are currently determined by the DRP and DOH on a case-by-case basis.
- For ecological data collection, training materials and field instruction is provided by Audubon of Florida and FWC for the two monitoring programs in place. Staff and volunteers participating in these monitoring programs must take the training or otherwise demonstrate sufficient expertise in the monitoring activities.
- Specific training materials for routine functions and designated QA activities
 - Public use wells are required to have standard operating procedures, including the “Operations and Maintenance Manuals”, to guide maintenance and to provide testing protocols. These manuals are inspected for compliance in the annual CHD inspections.
- Refresher trainings or delivery of updated information
 - Updates are provided at the discretion of the CHDs, Audubon of Florida, and FWC for the various QA activities listed in the DRP plan.

Sampling Design and Procedures

Successful implementation of DRP’s program relies on valid data, which begins with proper sampling. Therefore, DRP performs the following activities concerning sampling:

- Well water sampling/testing for chlorine or water sampling from swimming beaches that is assigned to staff (i.e., not contracted out) is done so at the discretion of the park manager, depending on day-to-day operational considerations. The sampling plan and SOPs consist of the instructions and schedule as dictated by the CHD.
- Contracted water sampling SOPs are included in DEP’s QA templates attached to purchase orders and contracts.

Data Review

DRP has no regulatory role, but rather submits samples and data as required by permits, following the appropriate QA programs adopted by the permitting agencies. Therefore, the activities described above (i.e., water sample collection/transport and chlorine testing, and imperiled species monitoring, do not need DRP's own Data Quality Objectives and Data Quality Indicators, or need to incorporate the concepts and criteria found in DEP's "Process for Assessing Data Usability", DEP-EA-001/07.

Documentation

Since accurate documentation is an important factor for determining the success of QA activities, DRP carries out the following record-keeping procedures for the indicated activities to ensure appropriate documentation:

- Sampling
 - Water sampling from beaches and potable water wells are done regularly by or for CHDs and logs at the park are not needed. An exception is the regular chlorine checks conducted by staff, which are logged in according to CHD protocols.
- Field-testing
 - None appropriate
- Data review
 - None appropriate
- Calculation checks
 - None appropriate
- Data archiving
 - Public well chlorine test logs are retained according to the standard DEP records retention schedule.
- Checks of database entries
 - No databases for the QA System activities are maintained by parks.
- Document control and maintenance

The lab results returned to the parks from the CHD are filed in the parks. Ecological monitoring data are scanned and send from the parks to the district offices for compilation, then on to DRP's Bureau of Natural and Cultural Resources (BNCR) for statewide compilation, and then on to Audubon

of Florida and FWC by hard copy or electronically. Electronic copies are maintained by BNCR. The information on marine turtle nesting is maintained on a spreadsheet over the years by BNCR and is used in their annual statewide summary report of resource management activities.

- Record generation, retention, and storage procedures
Lab results are kept on file by the parks and are subject to the DEP records retention schedule. Parks and district offices keep imperiled species monitoring results at their discretion for management and interpretive purposes.

Contract Management

DRP's program ensures that the DEP contracts are properly managed to assure appropriate data quality. As such, DRP conducts the following activities related to contract development and review:

- **Description of process for review of contracts, work plans, and QA plans for sampling and analysis tasks, etc.**
The contracted water quality data collection and analysis falling under this Quality System is subject to standard DEP finance and purchasing regulations. DEP has established a procedure in the past that ensures the attachment of the DEP QA Template to contracts and purchase order packages so that contractors are aware that their obligations include quality assurance to DEP standards.

Audits and Corrective Actions

DRP is a permittee, not a permitter, and has no regulatory role. Data collected under the DRP Quality System are collected under protocols established by other entities. Local County Health Departments verify chlorine testing methodology and results at their discretion. The activities described above, i.e., water sample collection/transport and chlorine testing (or the contracting out of those activities), and imperiled species monitoring, are not appropriate for establishing a DRP audit program.

Report Compilation

To provide the Secretary with information regarding DEP's ongoing QA efforts, DRP describes and compiles the results of all appropriate QA activities, and relays it to the Standards and Assessment Section for an annual report.