

## **Interagency Team – Credible Data Proposal to Ecology to support refinements to Water Quality Policy 1-11 (WQP) and Water Quality Assessment (WQA) and Total Maximum Daily Load (TMDL) development**

The Interagency Team recommends refining WQP 1-11 and associated processes to include standardized data quality assessment steps which allow for objective assessment of any data set, collected for any intended use, to be deemed appropriate (or not) for use in the WQA & TMDL development. We request development and use of standardized criteria and data assessment protocols to improve data credibility and confidence in assessment results. The framework identified below should be made available to interested parties and required of those submitting or using data in the WQA and TMDL development processes. Additionally, we request tools be created or modified in a manner that integrates with Environmental Information Management (EIM) and Ecology's Electronic Data Deliverable (EDD), as a data processing refinement to currently available tools. We recognize concepts of the Interagency Team's proposal could be implemented in multiple ways by Ecology.

The Interagency Team proposes the following framework to improve and employ consistent processes for collecting, assessing, and utilizing credible data in WQA and TMDL development:

- 1) Create and apply method and data quality objectives (MQOs and DQOs) to define a baseline level of acceptability (validation and credibility) for data used in WQA and TMDL development projects based on the following examples:
  - [SCUM II](#)
  - WSDOT's Stormwater Monitoring: Chemical Data Validation Guidance and Criteria (see attached)
  - Ecology's [EDD Processing Tool Users' Guide](#) and accompanying [Software](#) (Supports listed items # 4 & 5 below)
- 2) Include standard MQOs and DQOs in water quality monitoring QAPP template(s).
  - Applicable QAPP templates include Water Quality Program grant funded projects, NPDES permit-related QAPPs, and Ecology's internal monitoring projects conducted in support of state and federal clean water programs.
  - Reference MQOs and DQOs in Policy 1-11 as baseline credibility requirements for data used in the assessment.
- 3) Develop a programmatic QAPP for Ecology staff or contractors performing the WQA, which is a recurring data usability assessment project.
  - Include MQOs and DQOs in the QAPP.
  - Include internal procedures for evaluating data used in the WQA.
- 4) Modify Ecology's Environmental Information Management (EIM) system:
  - Define QA levels 3 and 4 based on MQOs and DQOs. Consider including a summary of these criteria in EIM to reduce confusion and incorrect QA levels.
  - Add fields to the EIM results sheet and require data submitters to include lab and field quality control data to facilitate data verification/validation supportive of QA levels.
  - Require a certification (sign and submit attribute) for those submitting data with a QA level 3 or 4. An example is found in general condition G19 of current NPDES Municipal Stormwater Permits.
  - Implement an audit (validation) of the data certified to meet QA levels 3 and 4.
- 5) If feasible, consider including MQOs and DQOs in Ecology's new "computer algorithm" as another QC check on data submitted and certified to meet QA level 3 and 4 standards. See example provided for the last bullet of Item # 1 above.