

In the Illinois River QAPP, I have the following concerns:

- First of all, this document doesn't follow the format outlined in R5, EPA Requirements for Quality Assurance Project Plans (<http://www.epa.gov/quality/qs-docs/r5-final.pdf>), so it is very difficult to review this in the given time to see if the elements are there. Some of the elements are very out of place. For example, the legal limit for phosphorus, which should be given in Section A5, does not appear in this QAPP until page 19 (2/3 into the document).
- On Page 7, it says the AQUA TERRA Quality Assurance Officer develops the QAPP. The QAPP is supposed to be generated by those who generate the data (usually the project manager or principal investigator) with the QA Officer providing oversight. A QA Officer cannot be objective if they are developing the QAPP. The QA Officer needs to be separate from the data generating group which is the one that develops the QAPP.
- In Section 5.0 on Page 9, the QAPP says the goal of the project is to “develop a scientifically robust and defensible watershed model to determine reductions in phosphorus loads needed to meet water quality standards in both states, Arkansas and Oklahoma. This watershed model will serve as a tool for sound technical decisions on appropriate point and nonpoint source controls to meet those standards. Ultimately, the intent is development of a tool that can lead to scientifically sound TMDLs and a basin-wide water quality restoration plan.” What is missing from this section is the following required information to be in Section A5: Problem Definition/Background as stated in R5 (*Include sufficient background information to provide a historical, scientific, and regulatory perspective for this particular project.*)
- Also in Section A5, according to the EPA document “Guidance for Quality Assurance Project Plans for Modeling”, the following information should be included: *The regulatory or scientific need for using a model (versus, for example, using existing data or collecting new measurements) and the necessary features of the model should be specified within Element A5 (Problem Definition/Background) of the QA Project Plan.* [<http://www.epa.gov/quality/qs-docs/g5m-final.pdf>] This QAPP doesn't even specify which model will be used (says HSPF or SWAT).
- Documents and records (which are supposed to be in A3) aren't mentioned until the unnumbered page after 25 (QAPP is 27 pages) and then it doesn't specify the exact records or what form they are kept in.
- In Table 1 (page 17) of the QAPP (secondary environmental data to be gathered), it doesn't give the source for this data. When generic sources are given on page 15, the QAPP doesn't specify what data would be obtained from those sources. Table 9 of G5 [<http://www.epa.gov/quality/qs-docs/g5-final.pdf>] says that for secondary data sources, the QAPP should focus on *the process to identify and acquire existing data sources, the intended use of the data through the course of the project, and the acceptance criteria to be used to determine whether the data are of sufficient quality for their intended use on the project.* This information is supposed to be in Section B9.