

May 1, 2009

Mr. Michael P. Kenyon  
Director, Office of Environmental Measurement & Evaluation  
U. S. Environmental Protection Agency  
11 Technology Drive  
North Chelmsford, MA 01863-2431

Dear Mr. Kenyon:

The New England Interstate Water Pollution Control Commission (NEIWPCC) has received your letter and associated summary report (dated February 10, 2009) detailing the results of the January 21, 2009 quality system assessment, which EPA conducted on our organization. The cover letter stipulates our need to prepare a corrective action plan to address the one non-conformance identified during the quality system assessment. This letter serves to describe the corrective actions to be implemented by NEIWPCC in order to increase the chances of preventing similar quality management system non-conformances from occurring in the future.

The non-conformance that the EPA assessment team identified consisted of two instances in which grant recipients (NEIWPCC contractors) submitted quality assurance project plans (QAPPs) for review without informing NEIWPCC personnel that data collection activities had already occurred. It is worth noting that for one of the instances identified (West Warwick Odor Control Study) existing corrective actions within the NEIWPCC quality management system were appropriately and effectively employed and the contractor was not compensated for the non-conforming data collection activities.

In an attempt to prevent future non-conformances of this nature, NEIWPCC will incorporate enhanced emphasis on the need to ensure that contractors do not begin data collection activities prior to developing, submitting, and receiving an appropriately-approved QAPP into the quality management system training module delivered during our annual all-staff meeting. As a further preventive step, all NEIWPCC managers will review this policy with employees under their direct supervision during the annual performance review process.

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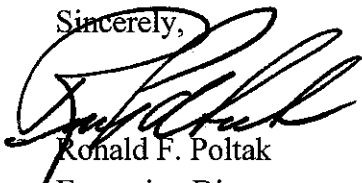
116 John Street  
Lowell, Massachusetts  
01852-1124  
[mail@neiwppc.org](mailto:mail@neiwppc.org)  
[www.neiwppc.org](http://www.neiwppc.org)  
p: 978-323-7929  
f: 978-323-7919

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In closing, NEIWPCC would also like to emphasize the highly-successful continued partnership we share with EPA in working towards sustainable quality management systems and the collection of robust information for the betterment of the environment. Please do not hesitate to contact me or Michael Jennings – the NEIWPCC Quality Management Program Manager – at 978-323-7929 if you have additional questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald F. Poltak", is written over the word "Sincerely,".

Ronald F. Poltak  
Executive Director  
NEIWPCC

Cc: NEIWPCC Quality Management Steering Committee  
Gerry Sotolongo, EPA Region 1  
Arthur Clark, EPA Region 1  
Carol Lynes, EPA Region 2