



## MEMO

**Subject** External Data Policy

**Date** July 28, 2025

**To** External Data Partners

**From** Joshua Barth, Environmental Program Manager II *JB*

**Background:** As part of Delaware's Combined Watershed Assessment Report (305(b)) and Determination for the Clean Water Act Section 303(d) List of Waters Needing Total Maximum Daily Loads (the Integrated Report), the Department of Natural Resources and Environmental Control's Watershed Assessment Branch (DNREC WAB) provides an opportunity for external partners to provide data. This data may be used as part of our assessment purposes even though it was not part of our annual State of Delaware data collection. The DNREC WAB has created the following External Data Use policy to improve transparency and communication as to when external data will be used for assessment purposes.

**External Data Use Policy:** The DNREC WAB prepares the Integrated Report (IR) every even-numbered year. During the development of the IR, the DNREC WAB publicly solicits water quality data (i.e. data collected from organizations outside of DNREC WAB) to aid in the assessment process. All submitted data is reviewed by DNREC WAB staff, but only data meeting established requirements for collection, processing, and analysis can be used directly as part of an assessment. This ensures a level of uniformity when creating a comprehensive and accurate assessment of Delaware waters. Any data that does not meet these requirements will be included as supplemental information in the IR and will be referenced as supporting data in relation to an assessment.

Acquiring water quality data requires adherence to precise methodologies from collection to analysis during each sampling event to standardize procedures and replicate results. This is especially necessary when comparing data from different sources. Therefore, the DNREC WAB deems "external data" as water quality data other than that obtained from the General Assessment Monitoring Network (GAMN), as outlined within the State of Delaware Ambient Surface Water Quality



Monitoring Program (<https://dnrec.delaware.gov/watershed-stewardship/assessment/water-quality-monitoring/>). For an external data submission to be considered “reliable and relevant data”, and used for listing and assessments, it must meet the defined Tier-I status. All other data will be defined as Tier-II status and used as supporting data.

To consider external data as either Tier-I or Tier-II the DNREC WAB needs to know the following:

### **Data collection duration**

The DNREC WAB assessment for an IR cycle is based on five years of data. For the IR 2026 cycle, assessment data must be from January 1, 2020 – December 31, 2024.

### **Methodology**

The DNREC WAB needs to review methodologies to ensure they are equivalent to EPA approved methodologies and congruent with State of Delaware methods for assessment purpose. This can be done by providing a Quality Assurance Project Plan (QAPP), Quality Assurance Program Plan (QAPrP), or similar document that details organization’s methodologies used for the provided parameters in advance. If only submitting as supporting data, the DNREC WAB needs to know details about sample location, frequency of collection, and analysis method methodologies.

### **Tier-I: 303(d) Listing and Assessment**

The DNREC WAB will consider the following external data for 303(d) listing and assessment purposes.

- **Surface Water Quality Data:** The DNREC WAB surface water sampling and laboratory methodologies are outlined within our annual surface water monitoring plan (referred above) and our EPA approved QAPrP (Request Reference).
- **Fish Tissue Data:** The Department’s fish tissue sampling and laboratory methodologies are outlined within (Request Reference).



- Toxics Data: The Department's toxics sampling and laboratory methodologies are outline within (Request Reference).
- Habitat and Biology Data: Methods are still under development.

*For data to be considered as Tier-I data it must be submitted as a spreadsheet.*

### **Tier-II: Supporting Data**

The DNREC WAB will continue to accept all other data; however, those data will not be used for assessment and listing purposes. Instead, the data will be used as supporting data. Such data will be included in the external data section of Delaware's IR. Supporting data will be used to draw attention to water quality issues in areas with limited monitoring stations. The supporting data will also assist the DNREC WAB with future water quality monitoring plans, ensuring state monitoring resources are being allocated appropriately.

The DNREC WAB appreciates the effort of all stakeholders and partners in ensuring that all Delaware waters attain their designated uses, making them safer for human and aquatic resources. Please address all external data questions to [SurfaceWQS@delaware.gov](mailto:SurfaceWQS@delaware.gov).