Summary of Corrective Actions in Response to Sampling Performance Audit Report

Armstrong Wood Products (former Triangle Pacific Facility)

Comments are numbered according to the summary of deficiencies in the preliminary audit report.

1. Proposed corrective actions of taking extra care in lowering the bailer into the water column and limiting the depth to which the bailer is lowered are acceptable precautions if effective in decreasing sediment disturbance. The use of shorter bailers may also make this effort more effective. If the proposed corrective actions do not eliminate the turbidity problem, then alternative methods of sampling as detailed in the 2002 DEP SOPs need to be considered.
2. Response acceptable.
3. Maintenance of sampling equipment has been noted. It should be standard operating procedure for equipment to be checked prior to the sampling event to ensure proper operation. In addition, procedures need to be in place that will allow resolving the problem before proceeding with sampling.
4. Calibration checks every 4 hours is an acceptable corrective action and in accordance with the 1992 SOPs. Calibration records submitted with your response were reviewed. The time of all initial calibrations and calibration checks must be recorded. A conductivity standard in addition to a zero standard must be used to demonstrate an acceptable calibration. Additional information needs to be provided for dissolved oxygen to document adequate calibration. Records need to be maintained that relate the saturated air instrument readings to % saturation at the test temperature. See the 2002 DEP SOPs for further information.
5. Response acceptable.
6. Corrective actions are acceptable. As indicated in item 1 above additional protocols from the 2002 DEP SOPs need to be considered if proposed corrective actions do not eliminate the observed turbidity problem.

There were several field measurement documentation omissions noted in the annotated audit checklist that also need to be incorporated into your project protocols.

Florida Department of

Memorandum **Environmental Protection**

To: Doug Outlaw, Professional Engineer
Hazardous Waste Permitting Section

From: Andrew R. Tintle, Environmental Specialist
Environmental Assessment Section

Date: December 24, 2003

Subject: Summary of acceptable corrective actions in response to DEP field audit
Armstrong Wood Products (former Triangle Pacific Facility)
Tampa, FL
Audit Date: 3/28/02

Reference: Preliminary DEP Field Audit Report, September 5, 2002 (Environmental Assessment Section)
Corrective Action response, February 19, 2003 (Letter from Geologic Services Corporation)

The permitee was asked to respond to both the "Summary of Deficiencies Requiring Corrective Actions" in the body of the subject DEP preliminary field audit report, dated September 5, 2002, as well as the specific deficiency items designated in the audit checklists attached to the report.

The permittee's responses to the Department's request for specific corrective actions for each reported deficiency are contained in the consultant's report dated 2/19/03. The consultant has adequately responded to all deficiencies noted in the field audit report except for the comments listed below.

With this memo, the Environmental Assessment Section has determined that the permittee's consultant has taken appropriate corrective actions pursuant to the subject audit report, except for additional instructions for corrective action contained in the attachment. The draft audit report and checklists, taken together with the consultant's response and this memo and summary of corrective actions will comprise the final audit report.

If you have any further questions concerning this audit, please call me at 245-8075 or e-mail me at andrew.tintle@dep.state.fl.us

Attachment: Summary of corrective action responses

Copies to: file