Florida Department of

Memorandum **Environmental Protection**

To: Kathy Gaynor, Environmental Engineer
Hazardous Waste Permitting Section

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

Date: January 7, 2004

Subject: Field Sampling Performance Audit Report
Singleton Battery Company

Please see the attached report and checklists for the field sampling performance audit conducted at Singleton Battery Company on April 23, 2003. The audit was conducted by the Environmental Assessment Section (EAS).

Sampling activities were audited using the DEP SOP ("Standard Operating Procedures for Field Activities", DEP-SOP-001/01), which was published as a final version on January 1, 2002. Some procedures stipulated in the 1992 edition of the DEP SOP in effect at the time when sampling procedures were agreed upon for this project may be at variance with requirements of the 2002 DEP SOP. Where procedures differed from those in the 2002 DEP SOP, the auditors have attempted to clarify the checklist responses. Sampling personnel should notify you of any audit discrepancies in this regard when responding to this report.

At your discretion, the permittee should be asked to respond to the report according to one or more of the following requirements. However, consequences of non-response are herein summarized and should be invoked as necessary for the purposes of this audit and the conditions of the permit.

RESPONSE REQUIREMENTS

(1) The permittee or the permittee's consultant must respond to each specific deficiency listed under the "deficiencies" section of this correspondence and noted in the attached checklists. Deficiencies include specific items detailed in this memo and all items in the checklists for which the auditors could not determine that performance requirements had been met. The response must include the specific measures to be taken in correcting each deficiency, the timetable for implementation of corrective actions and any other information pertinent to the evaluation of the data generated from the audited sampling event for purposes of permit compliance.

(2) The response may include discussion of any items in the report for the purposes of clarification, explanation or rebuttal.

REVIEW OF CORRECTIVE ACTIONS, CONSEQUENCES OF NON-RESPONSE AND RECOMMENDED DEPARTMENT ACTIONS

Failure to respond with a corrective action plan or failure to respond to this audit report may result in a recommendation by the EAS to reject or qualify all or selected portions of the data produced by the permittee through its consultant audited for this report (see item #3 below).

(1) When the corrective action plan and any other responses have been received from the permittee (or its consultant), the EAS will review the proposal to determine if appropriate corrective actions have been taken. If the plan is acceptable and all other response items have been resolved, the EAS will issue a report providing an evaluation of the corrective action responses submitted by the permittee. The final audit report package will consist of the preliminary audit report, the report of proposed corrective actions from the permittee (or consultant) and the EAS evaluation of responses.

(2) If modifications to the proposed corrective actions are required, the permittee will have another opportunity and additional time to propose acceptable corrective actions before the final audit report package is issued.

(3) Where the circumstances of data use and the severity of observed deficiencies warrant, the EAS may recommend that any or all data produced from the audited sampling event(s) or other past sampling events conducted on behalf of the permittee by the audited consultant should be qualified or rejected, based on these audit findings, and regardless of corrective actions currently initiated by the permittee or the consultant. Any such recommendation will be formally communicated to you as the DEP project manager for the permit as well as to any other users of the affected data, as applicable, in accordance with the DEP Quality Assurance rule, 62-160, F.A.C., and all other governing rules, permits or orders in effect at the time of this audit or audit report. Acceptance of data from any future sampling events conducted on behalf of the permittee by the same consultant may be dependent on the implementation of adequate corrective actions satisfactory to the Department.

FIELD SAMPLING PERFORMANCE AUDIT - MAJOR DEFICIENCIES

The major deficiencies in sampling performance noted during this audit are listed below.

1) Dissolved oxygen calibration records for the Horiba instrument were not recorded. DO calibration protocols must include the results of a water saturated air calibration check. A table has been provided in the 2002 version of the DEP SOPs providing 100% saturation values at the test temperature. Results of the initial DO calibration must be recorded and a verification performed demonstrating no more than a 0.2 mg/L discrepancy from the 100% saturation value. It was noted that a saturation value was provided for the YSI calibration verification but no information on water saturated air values were provided for the initial calibration.
2) Records to document performance of temperature calibration checks must be retained on all instruments that are used to report temperature readings or where temperature readings impact the final results. See DEP SOP FT 1400 for further information.

3) Only one pH standard was used for the calibration of the Horiba instrument. At a minimum 2 pH standards must be used for initial calibration.
4) Records were not maintained on the conductivity standard used for calibrating the Horiba instrument. The concentration of this conductivity standard could not be verified from manufacturer's information. Solutions documented to be of a known conductivity value must be used for calibration. Two standards were used for the YSI instrument but the high level standard did not read within the 5% acceptance criteria.
5) Records need to be maintained on all standards used for calibration. These records must include manufacturer, lot number, concentration and expiration date. The standards used must be linked to the calibration performed.

Please call me at (850) 245-8075 or e-mail me at andrew.tintle@dep.state.fl.us if you have any questions concerning the audit report, response requirements or appropriate corrective actions.

Attachments (1): Audit report and checklists