Florida Department of

Memorandum — Environmental Protection

To: Nicanor Madrid
Hazardous Waste Permitting Section

From: Andrew Tintle
Environmental Assessment Section

Date: May 5, 2005

Subject: Final Report – St. Marks Powder
Performance Audit Date – March 13, 2003

The DEP Hazardous Waste Regulation Section, in fulfillment of cooperative agreements with EPA Region IV, requested the referenced audit for the management of RCRA permitting activities.

The following final comments are being transmitted to you for the field audit conducted at St. Marks Powder in St. Marks, Florida on March 13, 2003.

The St. Marks Powder responses to the preliminary audit report, dated February 17, 2004, were reviewed and proposed corrective actions for the reported deficiencies were satisfactory with the following clarifications. Comments have been numbered according to the numbering scheme in the attached St. Marks Powder response.

1. General Comments
    a. Responses were based on the version of the DEP Field Activities SOP effective at the time of the audit. These SOPs have been revised with the latest effective version dated February 1, 2004. A summary of the most recent changes to the SOPs may be found at: http://www.dep.state.fl.us/labs/sop/index.htm
    b. A QA Manual following directives in FA 3300 of the Florida SOPs must be written as acknowledged in the response.

2. Field Sampling Performance Audit – Major Deficiencies
    a. Comment Number 3 – Precautions must be taken whenever collecting surface water samples to avoid disturbing sediments and collecting samples containing sediments that are not representative of the water column being sampled.
    b. Comment Number 8 – Bailers are not recommended for the collection of Volatile Organic Compounds or Extractable Organic Compounds in groundwater unless they have been approved by the DEP Program. The Groundwater SOP, FS 2200, includes discussions of the appropriate use of pumps (peristaltic or submersible) for the collection of these analyte groups.

3. Audit Checklist Deficiencies
    a. Comment Number 8 – Maintenance records were not requested but to clarify, records of all documentation including routine maintenance as well as repairs must be maintained on all instruments used for field testing.

This final memo along with the previous memo and preliminary audit report dated December 24, 2003 comprise the final report for this audit.

Attachment (1): St. Marks Powder Audit Responses dated February 17, 2004