Florida Department of

Memorandum **Environmental Protection**

To: Stacie Davis, *Hazardous Waste Regulation Section*

Through: Russ Frydenborg, *Environmental Assessment Section*

Through: Andrew Tintle, *Environmental Assessment Section*

From: Michael Blizzard, *Environmental Assessment Section*

Date: June 15, 2004

Subject: Field Sampling Performance Audit Report
Eglin Air Force Base
Range C-62 OB/OD Unit

Reference: Permit No. 0006176-003-HO
EPA ID. FL8570024366

Please see the attached report and checklist for the field sampling performance audit at Eglin AFB on November 5, 2003. The audit was conducted by the Environmental Assessment Section (EAS) and included a subsequent review of groundwater sampling logs for samples collected on November 5 & 6, 2003.

Sampling activities were audited using the DEP SOP ("Standard Operating Procedures for Field Activities", DEP-SOP-001/01), revision January 1, 2002. The consultant indicated the intention to follow this document for the audited sampling event.

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

1. The sampler's collection technique using the submersible pump produced aeration and bubbling of the VOC samples. The aeration was the result of the force of the pump stream and the angle at which the stream was directed into the VOC vial. Essentially, the pump and tubing configuration did not allow sufficient control of flow to allow conformance with the DEP SOP requirements for VOC sample collection.

2. The field documentation made available to the auditor is inadequate to determine whether acceptable calibrations and verifications were performed and linked to the purge stabilization measurements for both sampling days. The samplers did not appear to verify the meter calibrations while the auditor was on-site except in

one instance for turbidity, and meter malfunctions were observed for both turbidity and dissolved oxygen on the day of the audit that may have been the result of uncalibrated conditions and/or instrument maintenance problems. This prevented the measurement of reliable stabilization parameters to determine whether DEP SOP purging criteria were met for each sampled well.

Response requirements
The permittee or the permittee's consultant should be asked to respond to the audit report by addressing each deficiency noted in the attached checklist, as explained by the checklist legend. The response should include the specific corrective actions to be taken. Some checklist items indicate that additional information should be provided in order to determine whether the audit criterion is applicable or was satisfied. The response may include discussion of any items in the report for the purposes of clarification or rebuttal.

Issuance of final audit report
When the response has been received from the permittee (or its consultant), the EAS will review it to determine if appropriate corrective actions have been taken and issue a report providing an evaluation of the submitted response.

If modifications to the proposed corrective actions are required, the permittee should be given another opportunity and additional time to propose acceptable corrective actions before the final audit report package is issued.

When all responses have been reviewed, the EAS will issue the final audit report package consisting of the preliminary audit report, the response(s) from the permittee (or consultant) and the EAS evaluation of all responses.

Please let me know if you have any questions or need further assistance.

Attachments: Audit report

Copies to:

Andy Tintle, DEP EAS
Russ Frydenborg, DEP EAS
Camille Stein, DEP HWRS
Audit file