Florida Department of

Memorandum **Environmental Protection**

To: Nicanor Madrid
Hazardous Waste Regulation Section

Through: Russ Frydenborg
Environmental Assessment Section

Through: Andrew Tintle
Environmental Assessment Section

From: Michael Blizzard
Environmental Assessment Section

Date: November 10, 2004

Subject: Field Sampling Performance Audit Final Report
FDOT Fairbanks Disposal Pit

Reference: Field Sampling Performance Audit Preliminary Report
FDOT Fairbanks Disposal Pit
Audit conducted 3/4/03
Preliminary report drafted 7/3/03
Response from HSW Engineering, Inc. (consultant) 11/3/03

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 (numbered according to the original audit report findings and the consultant's responses) are being transmitted to you for the field audit conducted at FDOT Fairbanks Disposal Pit on March 4th, 2003. The comments clarify the original findings of deficiency and in some cases, the suggested corrective action, based on the consultant's response. The consultant's corrective actions should otherwise include remedies pertinent to the items listed below, as none were specifically proposed for these items in their response.

The consultant's responses and corrective actions for the remainder of the reported deficiencies were satisfactory.

This final memo along with the previous memo and preliminary audit report sent to you on 7/3/03 comprise the final report for this audit.

1.1 No decontamination records were exhibited to the auditors.

1.2 Calibration verification for pH, turbidity and specific conductance could not be definitively determined from the field record. The sampling team member specifically responsible for calibrations was not indicated.

1.4 Depth-to-water was not recorded for the two of the wells sampled with passive diffusion bags. The total well depth can be inferred from pre-existing information but was not recorded in the field logs for the sampling event. Ending purge time was not recorded at well S-5R.

1.5 Per FD 5100, section 2.3 (DEP-SOP-001/01, 1-1-02), the number of well volumes should have been recorded as part of the standard purging documentation.

1.6 The sampling team member specifically responsible for purge stabilization (field testing) measurements was not indicated in the field records.

1.7 Transmittal records were not exhibited to the auditors when documentation for the sampling event was requested from the consultant.

1.8 Samplers should be instructed to check the field documentation for errors.

2.2 The auditors agree with the consultant that the field records do not provide clarification about pump cleaning procedures. Audit notes for the event are insufficient to substantiate the statement in the report. *This finding is retracted from the audit report.*

4.1 Per FS 2211, section 2.2, the auditors consider the results of the well inspection to have necessitated the finding. According to audit notes for the event, the wells installed at the sampling location were not physically marked with any designation as “S-5R”.

4.2 Unless a different, more accurate measuring tape is used for groundwater elevation measurements elsewhere required for permit compliance, the tape used for purging measurements should be marked in 0.01 foot increments.

4.3 The auditors assume that the water level relative to the well screen or open hole and to the placement of the PDB should be a concern at the time of sampling. It is noted that the consultant’s SOP for PDB placement and sampling requires that the device be installed below the level of water in the well.

4.6 As stated in the consultant’s PDB SOP, the samplers should be instructed to ensure that agitation and aeration of samples is minimized during collection in order to prevent VOC loss.

The EAS requires no further response from the consultant pertaining to this final report.

Please call me at (850) 245-8073 or e-mail me at michael.blizzard@dep.state.fl.us if you have any questions concerning the final audit report, the consultant’s response or this memo.

Copy to: Andy Tintle, DEP EAS
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