Florida Department of

Memorandum Environmental Protection

To: Nicanor Madrid
Hazardous Waste Permitting Section

From: Andrew Tintle
Environmental Assessment Section

Date: February 6, 2005

Subject: Final Report – Lockheed Martin Orlando
Audit Date – August 21, 2002

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 consultants draft responses) are being transmitted to you for the field audit conducted at Lockheed Martin Missiles and Fire Control in Orlando on August 21, 2002. The comments clarify the original findings of deficiency and in some cases, the suggested corrective action, based on the consultant's response. The consultants corrective actions should otherwise include remedies pertinent to the attached DEP 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 dated April 7, 2003 comprise the final report for this audit.

Attachment (1): Final DEP Response

1. Calibration

Audit Comment – only one pH standard used for initial calibration

DEP Response
Section 2.3 of FT 1100 (Field Measurement of pH)does say to follow the manufacturer's calibration instructions but also indicates that most instruments allow for a two point calibration and some a 3 point calibration. Section 2.3.3 (2002 DEP SOP) further clarifies that an initial calibration must be performed with at least two buffers.

Audit Comment – documentation of conductivity standard

DEP Response
Response OK. Standard information must be retained as part of the project records and not just temporarily captured on the bottle until the standard runs out.

Audit Comment – only a zero standard was used for turbidity calibration

DEP Response
EAS Guidance 02-01 does not override the calibration procedures of FT 1600 (the DEP TURBIDITY SOP). Neither the guidance document or the turbidity SOP say that the instrument needs to be calibrated according to the manufacturer's instructions. FT 1600 (2002 version)in section 3.2.4 says to run a standard in each instrument range in order to document acceptable calibration. In order to determine an acceptable calibration according to the DEP SOP acceptance criteria non-zero standards must be used.

Audit Comment – Temperature Calibration

DEP Response
The field testing procedures in the DEP SOPs are applicable to field measurements used to determine purge water stabilization. No distinction is made in testing procedures between field test results used to report regulatory values as part of permit compliance or for testing purge water. The only exception is that previously discussed for turbidity in which if certain performance criteria are met turbidimeters that do not meet EPA method instrument design specifications may be used. If these instruments are used FT 1600 calibration protocols still must be followed.

Temperature calibration procedures in the DEP SOPs must be followed.

A**udit Comment – Horiba U-10 calibration problems**

DEP Response
Agree with response. The responsibility of documenting calibration or other problems lies with the sampling team so the appropriate staff can know which data to qualify.

2. Audit Comment - Trip Blanks

DEP Response
Most organizations collect trip blanks for method 8260 since Chapter 4 of SW-846 referenced in Method 8260 says trip blanks should be collected. We agree that there may be some confusion about linking the

requirement for trip blanks to the method so the latest version (not in effect at the time of this audit) requires trip blanks if volatile organics are collected for the project independent of the method of analysis.

3. Audit Comment – Stabilizing DO and temperature readings

DEP Response
See previous comments concerning field test procedures for verifying purge water stabilization and values for reporting or permitting purposes.

In-situ measurements are not mandatory but obtaining temperature and dissolved oxygen readings that meet purge acceptance criteria is required. If they cannot be met additional documentation to justify sample collection must be provided so DEP Project Managers can decide whether or not sample acceptance is warranted. In our experience these purge criteria are able to be met in most cases with reasonable equipment set ups and precautions.

4. **Audit Comment – Documenting in-take tubing positioning**

DEP Response
The response is fine as long as it is documented in an SOP that the tubing is positioned in the same manner for all wells.