Florida Department of Environmental Protection
Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 17, 2007

Mr. John M. McBride, Mr. Louis L. Knight, and Mr. Miles W. Bolton
Apex Companies, LLC
2640 Capitola Street
Jacksonville, Fl 32209

Dear Mr. McBride, Mr. Knight, and Mr. Bolton:

I appreciate the time you have devoted to the field sampling performance audit conducted at the Exide Facility in Jacksonville, Florida on April 17, 2007. The audit was conducted by the Environmental Assessment Section (EAS) and included a subsequent review of sampling logs and other documentation for the audit day that were submitted to our offices.

Sampling activities were audited using the DEP SOP ("Standard Operating Procedures for Field Activities", DEP-SOP-001/01), revision February 1, 2004.

Deficiencies

All deficiencies can be found listed in the attached Word document. Although there were several procedural and documentation issues, the overall data quality was not affected. The following suggestions are offered for the samplers' consideration:

- The samplers should ensure that samples are covered with ice as soon as collected so that the 15-minute window for preservation is met. Samplers should ensure that all sample containers are completely submerged in ice so that chilling occurs as rapidly as possible.

- While some failures in stabilization parameters occurred, the samplers made their best effort to get the well to stabilize before samples were drawn.

- Ensure that sample measurements are quantitatively bracketed and verified properly for each field testing parameter.

- Ensure that unique instrument designation codes and units of measure are included on each set of data sheets.

Response requirements

The permittee or the permittee's consultant should respond to the audit report by addressing each deficiency noted in the attached spreadsheet, in the space provided. The response should include the specific corrective actions to be taken. Some items may 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. Please return response via e-mail. If no response is received an assumption will be made that appropriate corrective actions will have been implemented to insure problems noted will be corrected in the future.

Issuance of final audit report

The response must be received within **45 days** of the issued date at the top of this letter; after which this letter will be considered the final report. The response will be reviewed by the EAS and determine if appropriate corrective actions have been taken. When all responses have been reviewed, the EAS will issue this letter as a final audit report if no additional changes need to be made.

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

Sincerely,

Jessica Patronis
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Environmental Assessment Section
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Attachment: Field Performance Audit of Sampling Procedures

cc (via e-mail): Nicanor Madrid- FDEP RCRA Section