Florida Department of

Memorandum Environmental Protection

To: Camille Stein, Environmental Specialist
Hazardous Waste Permitting Section

Through: Russ Frydenborg, Environmental Administrator
Environmental Assessment Section

Through: Andrew Tintle, Environmental Specialist
Environmental Assessment Section

From: Tom Deck, Environmental Specialist
Environmental Assessment Section

Date: January 20, 2004

Subject: Field Sampling Performance Audit Report
Navy Public Works (NAS Pensacola)

Please see the attached report and checklists for the field sampling performance audit at Navy Public Works (NAS Pensacola) on January 13th, 2004. The audit was conducted by the Environmental Assessment Section (EAS) and included a subsequent review of field logs and related documents for the samples collected on January 13th, 2004.

Sampling activities were audited using the DEP SOP ("Standard Operating Procedures for Field Activities", DEP-SOP-001/01), which was published as a final version on January 1, 2002.
At your discretion, the permittee should be asked to respond to the report according to one or more of the following requirements. Consequences of non-response are herein summarized and should be invoked as necessary for the purposes of this audit and the conditions of the permit.

RESPONSE REQUIREMENTS

(1) The permittee or the permittee's consultant must respond to each specific deficiency noted in the attached checklists. Deficiencies include all items in the checklists for which the auditors could not determine that performance requirements have been met. The response must include the specific measures to be taken in correcting each deficiency, the timetable for implementation of corrective actions and any other information pertinent to the evaluation of the data generated from the audited sampling event(s) for purposes of permit compliance.

(2) The response may include discussion of any items in the report for the purposes of clarification, explanation or rebuttal.

REVIEW OF CORRECTIVE ACTIONS, CONSEQUENCES OF NON-RESPONSE AND RECOMMENDED DEPARTMENT ACTIONS

Failure to respond with a corrective action plan or failure to respond to this audit report may result in a recommendation by the EAS to reject or qualify all or selected portions of the data produced by the permittee through its consultant audited for this report (see item #3 below).

(1) When the corrective action plan and any other responses have been received from the permittee (or its consultant), the EAS will review the proposal to determine if appropriate corrective actions have been taken. If the plan is acceptable and all other response items have been resolved, the EAS will issue a report providing an evaluation of the corrective action responses submitted by the permittee. The final audit report package will consist of the preliminary audit report, the report of proposed corrective actions from the permittee (or consultant) and the EAS evaluation of responses.

(2) If modifications to the proposed corrective actions are required, the permittee will have another opportunity and additional time to propose acceptable corrective actions before the final audit report package is issued.

(3) Where the circumstances of data use and the severity of observed deficiencies warrant, the EAS may recommend that any or all data produced from the audited sampling event(s) or other past sampling events conducted on behalf of the permittee by the audited consultant should be qualified or rejected, based on these audit findings, and regardless of corrective actions currently initiated by the permittee or the consultant. Any such recommendation will be formally communicated to you as the DEP project manager for the permit as well as to any other users of the affected data, as applicable, in accordance with the DEP Quality Assurance rule, 62-160, F.A.C., and all other governing rules, permits or orders in effect at the time of this audit or audit report. Acceptance of data from any future sampling events conducted on behalf of the permittee by the same consultant may be dependent on the implementation of adequate corrective actions satisfactory to the Department.

FIELD SAMPLING PERFORMANCE AUDIT - MAJOR DEFICIENCIES

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

(1) Preservation checks were not performed on pre-preserved bottles. Through conversation with samplers no preservation checks had been performed during past visits. DEP-SOP-001/01 requires that all samples requiring pH adjustment be tested for proper pH preservation during the first-time sampling for the project, and one sample per analyte group be checked during repeat sampling for the project.

(2) Cyanide samples were not checked for the presence of sulfides or oxidizing agents.

(3) DEP-SOP-001/01 requires that two standards bracketing the expected sample range be used for the initial calibration of conductivity, and pH. Field sampler used only one standard during the calibration of conductivity, and did not bracket the expected sample range for pH.

(4) The field sampler did not use water saturated air, and a saturation table to calibrate the DO meter. After calibration the sampler should read the concentration of DO in air (in mg/L) and compare it to

the theoretical value for the observed temperature at the time of calibration. The value must be within 0.2mg/L of the theoretical value.

(5) The tubing for the peristaltic pump was allowed to drop to the bottom of the well. DEP-SOP-001/01 requires that well formation not be disturbed.

(6) The field sampler used a turbidity cell that was stained brown.

Please call me at (850) 245-8074 or e-mail me at thomas.deck@dep.state.fl.us if you have any questions concerning the audit report, response requirements or appropriate corrective actions.

Sincerely,

Thomas Deck
Environmental Assessment Section

Attachments (1): Audit report and checklists
Cc: Andy Tintle, DEP EAS
Russ Frydenborg, DEP EAS