

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE:

DEC 09 1992

SUBJECT:

TuTu Wells Site - CERCLA Technical Systems Audit

FROM: Laura Scalise, Project Quality Assurance Officer
Monitoring Management Branch

L Scalise

TO:

Caroline Kwan, Project Manager
New York/Caribbean Superfund Branch II

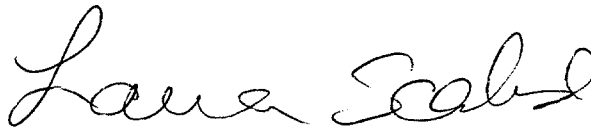
Attached please find the TuTu Wells Site audit report for the CERCLA limited technical systems audit performed on September 28 & 29, 1992. Please respond to this audit report within 30 days of your receipt for the action items noted.

If you have any questions, please call me at (908) 906-6171.

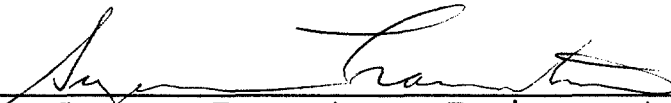
Attachment

CERCLA Limited Technical Systems Audit
TuTu Wells Site
Remedial Investigation
TuTu, St. Thomas, U.S. Virgin Islands
September 28 & 29, 1992

Performed by:



Laura Scalise, Environmental Scientist
Monitoring Management Branch



Suzanne Tramontana, Environmental Engineer
Monitoring Management Branch

Affiliation: U. S. Environmental Protection Agency
Environmental Services Division
Monitoring Management Branch
Edison, New Jersey 08837

Project Audited: TuTu Wells Site, Remedial Investigation
Soil & Groundwater Investigation
TuTu, St. Thomas, U.S. Virgin Islands

Date of Audit: September 28 & 29, 1992

Entity Audited: Geraghty & Miller, Inc.
Rochelle Park, NJ

Soil Tech Corp.
Rio Piedras, Puerto Rico
(G&M's subcontractor)

CDM-FPC
New York, NY
(EPA oversight contractor)

Personnel On-Site:

Clinton Moffatt	G&M NJ Office	Field Operations Leader/ sampler
Ruben Ponciano	G&M PR Office	Purge Team Leader
Alberto Barrera	Soil Tech	Sampling Team Leader
Guillermo Gonzales (Papo)	Soil Tech	Purger/Electrician
Steve Alicea	Soil Tech	Purger
Angel Ferrer	Soil Tech	Purger
Fernando Zavala (Pichy)	Soil Tech	Sampler/sample custodian
Susan Collagan	CDM-FPC	EPA oversight

Also present:

Ana Gloria Ramos	TEIC - Esso, PR	
	(TuTu Environmental Investigations Committee)	
José Agrelot	Soil Tech	President

Personnel Qualifications:

Personnel on-site appeared to be qualified to perform their assigned tasks.

Purpose of Audit:

The purpose of this limited technical systems audit is to observe field sampling activities and to evaluate the adequacy of quality control procedures carried out as compared to the approved field operations plan and Region II quality assurance policy.

Findings:

Monday, September 28, 1992:

This day was supposed to be the first day of the audit. A meeting was held with all 12 people mentioned in this report being present. A plan of operation was confirmed regarding the order of which wells would be sampled first. Also discussed was the procedure for examination of each well for floating product prior to purging; the proper decontamination procedure for the submersible pump and centrifugal pump tubing; and the procedure for purging 3-5 well volumes and sampling until measurements agree within 10%. No sampling occurred on this day.

Tuesday, September 29, 1992:

The two field teams were organized as outlined above in the "personnel" section. Both teams performed their respective tasks competently and according to the approved project plan. CDM did a good job with oversight, observing both teams and collecting split samples. There were very few deficiencies found by the auditors. The following assorted required paperwork was missing and needs to be submitted to the RPM, and then to the auditors:

1. Geraghty & Miller - needs to submit to the RPM the analytical data for their I-Chem and Eagle Pitcher sample bottles. Mr. Moffatt claimed these bottles to be I-Chem Series 300 bottles and Eagle Pitcher Level I bottles, which are consistent with the OSWER guidance, "Specifications and Guidance for Obtaining Contaminant-Free Sample Containers", dated July 1989.
2. Geraghty & Miller - Mr. Moffatt also claims that the deionized water obtained from their laboratory, Enseco East, had been analyzed prior to their use. This data demonstrating the deionized water to be analyte-free must also be submitted to the RPM.

There were two minor infractions that had occurred in the field during sampling:

3. Geraghty & Miller - The Region II CERCLA Quality Assurance Manual states that wells must be sampled within 3 hours from the time of purging. One well was sampled very closely to the 3-hour limit. In many cases this wouldn't be a problem, except in a hot climate area it is more likely for the standing water to change in chemical composition during that time frame. Geraghty & Miller was advised by the auditors to sample as closely to the completion of purging as possible. In the case of the well stated above, it was a slow recovery well; however, it was not checked for recovery and might have been sampled sooner.

4. CDM-FPC - The CLP Users Guide and the Region II CERCLA Quality Assurance Manual state that not only the filled cooler, but also each sample bottle be sealed with a custody seal. CDM did not have enough custody seals for each of their sample bottles; however, the coolers did have custody seals attached properly.

The only response requested from the RPM is the submission of the missing data on Geraghty & Miller's bottles and deionized water used in the field.