



June 7, 1995

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Ms. Sherrel D. Taylor-Domville
United States Environmental Protection Agency
Region II
Emergency and Remedial Response Division
290 Broadway
New York, New York 10007-1866

**Results of Second Quality Assurance Field Audit
Island Chemical Company Site
Remedial Investigation
St. Croix, U.S. Virgin Islands**

Dear Ms. Taylor-Domville:

This report has been prepared to document results of the second Quality Assurance (QA) field audit performed during the Remedial Investigation at the Island Chemical Company site in St. Croix, U.S. Virgin Islands, on May 10, 1995. This report has been prepared in accordance with the requirements specified in Section VII Part Ai(3)(g) of the Administrative Order on Consent (Consent Order) for this project dated September 29, 1994 (EPA Index No. II-CERCLA-94-0401) and described in Harding Lawson Associates' (HLA) conditionally approved Quality Assurance Project Plan (QAPP) revised August 3, 1994, Section C8.1.

On Wednesday, May 10, 1995, Mr. Bharat Patel of HLA performed a QA field audit as a followup to the initial audit performed on February 14 and 15 (HLA, March 1, 1995). The purpose of the audit was to evaluate whether the deficiencies noted during the initial audit have been corrected. The audit was performed at the time of field activities during the second groundwater sampling program. The sampling activities and associated documents, including: sample identification; sample control; chain-of-custody procedures; field documentation; and sampling operations, handling, and packaging procedures, were observed. The audit was not announced to the field team before its occurrence.

1.0 FINDINGS OF AUDIT

1.1 Sample Labels

The auditor examined sample labels for completeness and accuracy. The following sample labels were reviewed:

All bottles for sample MW-1/050995
All bottles for sample MW-101/050995
All bottles for sample MS/MSD/GW/MW-1/050995
All bottles for sample TB/050995
All bottles for sample MW-5/051095

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The sample labels were found to be in compliance with the requirements specified in Section 6.1.2.1 of the QAPP.

1.2 Chain-of-Custody Records

The auditor examined three chain-of-custody (COC) records for the samples (i.e., MW-1/050995, MW-101/050995 and MS/MSD/GW/MW-1/050995) collected on May 9 and one COC record for a sample collected on May 10 (sample MW-5/051095). The records were reviewed to determine whether (1) the station number, station description, date, and time corresponded to the sample label, (2) the parameters to be analyzed were properly identified, and (3) custody transfers had been documented and the date and time of transfer had been recorded. The auditor also reviewed whether the samples were kept in custody at all times and were properly and securely stored. Findings were as follows:

- HLA's COC record, included in the QAPP, were used.
- COC records were prepared concurrent with the sampling on May 10.
- Sample date and times corresponded to sample labels.
- Parameters to be analyzed were identified correctly.
- Samples were kept in custody at all times and securely stored.

Upon completion of the field sampling program, the COC records were again reviewed for completeness. The following deficiency was noted:

- Custody seal numbers were not noted on three of the COC records for samples shipped on May 10, 1995.

1.3 Field Logbooks and Other Forms

The field logbooks, Groundwater Sampling Forms, and Water Level Measurement Forms were reviewed during the field audit to confirm that each was signed and that all entries were dated. No deficiencies were noted.

1.4 Sampling Operations

The auditor reviewed sampling operations to determine if they were performed as stated in the Field Sampling Plan (FSP) and as directed by the Project Manager. The auditor determined that the proper number of samples were collected at the assigned locations and that the samples were in proper containers and properly preserved. The auditor also confirmed that the required field measurements and QA checks were performed and documented.

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2.0 CORRECTIVE ACTIONS

2.1 Sample Labels

No corrective actions were deemed necessary for the sample labels.

2.2 Chain-of-Custody Records

No corrective actions were deemed necessary for the COC records, with the exception that custody seal numbers shall be noted during the future sampling events.

2.3 Field Logbooks and Other Forms

No corrective actions were deemed necessary for the sample labels.

2.4 Sampling Operations

No corrective actions for sampling operations were deemed necessary based on the results of the field audit.

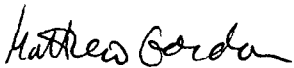
3.0 CONCLUSIONS

Results of this audit indicated no deficiencies that suggest problems with the quality of the samples.

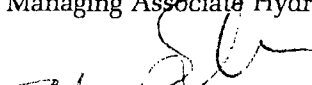
If you have any questions regarding this or any other project matter, please do not hesitate to contact either of the undersigned.

Yours very truly,

HARDING LAWSON ASSOCIATES



for Bharat Patel, CPG
Managing Associate Hydrogeologist


Jason M. Schindler
Associate Geologist

cc: Mr. Cecil A. Williams, GOVI, Department of Planning and Natural Resources
Lori G. Singer, Esq., Sills, Cummis, Zuckerman, Radin, Tischman, Epstein & Gross

BP/JMS/mls/EAM
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