



FLORIDA DEPARTMENT OF Environmental Protection

Southeast District Office
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
561-681-6600

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

September 30, 2021

Mr. Ronald F. Passaggio, General Manager
Palm Beach Country Club, Inc.
760 N. Ocean Blvd.
Palm Beach, FL 33480
rpasaggio@palmbeachcountryclub.org

Re: Consent Order, OGC No. 21-0266
Palm Beach Country Club
Palm Beach County

Dear Mr. Passaggio:

Enclosed for your implementation is the fully executed Consent Order in the above-styled case. Please familiarize yourself with the compliance dates and terms of this Consent Order so the complete and timely performance of the obligations is accomplished.

If you have any questions, please contact Denise K. Watts at 561-681-6701, or via e-mail at Denise.Watts@FloridaDEP.gov.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Andreotta".

Jason Andreotta
Director, Southeast District

ec: Lea Crandall, Agency Clerk

lea.crandall@dep.state.fl.us

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF FLORIDA DEPARTMENT)	IN THE OFFICE OF THE
OF ENVIRONMENTAL PROTECTION)	SOUTHEAST DISTRICT
)	
v.)	OGC FILE NO. 21-0266
)	
PALM BEACH COUNTRY CLUB)	
_____)	

CONSENT ORDER

This Consent Order (“Order”) is entered into between the State of Florida Department of Environmental Protection (“Department”) and Palm Beach Country Club (“Respondent”) to reach settlement of certain matters at issue between the Department and Respondent.

The Department finds and Respondent admits the following:

1. The Department is the administrative agency of the State of Florida having the power and duty to protect Florida’s air and water resources and to administer and enforce the provisions of Chapter 403, Florida Statutes (“F.S.”), and the rules promulgated and authorized in Title 62, Florida Administrative Code (“F.A.C.”). The Department has jurisdiction over the matters addressed in this Order.

2. Respondent is a person within the meaning of Section 403.031(5), F.S.

3. Respondent is the owner and is responsible for the operation of the Palm Beach Country Club Reverse Osmosis (R.O.) water treatment plant, a 0.540 million gallons per day (MGD) non-potable water or irrigation quality water treatment plant with up to 0.140 MGD of R.O. concentrate produced as wastewater effluent and discharged to an onsite exfiltration trench (Facility). The Facility is operated under Wastewater Permit No. FLA270768 (Permit), which was issued on November 7, 2016, and will expire on November 6, 2021. The Facility is located at 760 North Ocean Blvd, Palm Beach, Florida 33480, in Palm Beach County, Florida (Property). Respondent owns the Property on which the Facility is located.

4. The Department finds that the following violation(s) occurred:

a) Facility failed to have an Operation and Maintenance Manual (O&M Manual) available for review during the inspection. The Facility representative was unfamiliar with and unable to access the O&M Manual to demonstrate basic operation of treatment plant

and verify sampling points, in violation of Rule 62-600.720(1), F.A.C.

b) During calendar years 2019 and 2020, the Facility failed to make timely submittal of required Discharge Monitoring Reports (DMRs) as shown below, in violation of Rule 62-600.680, F.A.C.:

Year	Quarter	Missing Section
2019	1	Part A
2019	2	Parts A and D
2019	3	Part A
2019	4	Part A
2020	2	Part D
2020	3	Part A

The Facility submitted all missing DMRs through the Department's EzDMR portal by January 27, 2021.

c) The Facility failed to properly complete, maintain and provide to the Department the following sample and analysis documentation, in violation of Rules 62-160.240, F.A.C. and 62-160.340, F.A.C.:

- i. Sampling Calibration Verification Logs,
- ii. Field Sheets and Chain of Custody documentation, and
- iii. Laboratory Reports.

d) The Facility representative was unable to provide evidence of flow meter calibration during the inspection on December 21, 2020, in violation of Rule 62-620.300, F.A.C., which requires compliance with the conditions of the Permit. Specifically, Permit Condition I.E.8 requires that the flowmeter be calibrated at least annually, and the calibration report be kept at the facility and made available for the Department's review upon request. Calibration was completed on February 4, 2021 and documentation provided to the Department on February 5, 2021.

e) The cap was broken on monitoring well MWC-1 during the inspection on December 21, 2020, in violation of Rule 62-600.410, F.A.C. and Permit Condition IX.7, which requires the Facility maintain all equipment and structures so as to function as intended. The

Facility replaced the broken monitoring well cap and provided documentation to the Department on January 28, 2021.

Having reached a resolution of the matter, Respondent and the Department mutually agree and it is

ORDERED:

5. Respondent shall comply with the following corrective actions within the stated time periods:

a) Within 60 days of the effective date of this Consent Order, Respondent shall submit to the Department a copy of their O& M Manual, including the following:

(i) Emergency reporting and procedures in the case of a malfunction that leads to an unauthorized concentrate release;

(ii) Training logs reflecting that two to three staff members have been trained on the basic operation of the R.O. Facility equipment and emergency reporting and procedures.

b) Within 60 days of the effective date of this Consent Order, Respondent shall submit to the Department a copy of their Standard Operating Procedure (SOP) for maintaining all required records and reports. The SOP shall include the following:

(i) A list of staff positions responsible for maintaining Facility records;

(ii) Procedures to ensure records and reports are available to multiple staff members at all times, including supervisors.

c) Within 60 days of the effective date of this Consent Order, Respondent shall ensure all sampling and analysis documentation complies with Rules 62-160.240 and 62-160.340, F.A.C., including Sampling Calibration Logs, Field Sheets, Chain of Custody and Lab Report. Compliance audit checklists are attached hereto as Exhibit A for Respondent's convenience.

d) By July 7, 2021, Respondent shall submit all the above referenced forms for the samples collected for the April-June calendar quarter 2021 to be audited by Department staff to verify compliance with Rules 62-160.240 and 62-160.340, F.A.C.

6. Notwithstanding the time periods described in the paragraph 5 above, Respondent

shall complete all corrective actions within 120 days of the effective date of this Order and be in full compliance with Rules 62-160, 62-600, and 62-620, F.A.C., regardless of any intervening events or alternative time frames imposed in this Order, other than those excused delays agreed to by the Department, as described in Paragraph 13.

7. Within 60 days of the effective date of this Order, Respondent shall pay the Department \$9,250.00 in settlement of the regulatory matters addressed in this Order. This amount includes \$8,750.00 for civil penalties and \$500.00 for costs and expenses incurred by the Department during the investigation of this matter and the preparation and tracking of this Order. The civil penalties are apportioned as follows: \$4,500.00 for 6 violations of Rule 62-600.680, F.A.C.; \$2,250.00 for 3 violations of Rule 62-160, F.A.C.; \$1,000.00 for violation of Rule 62-620.300, F.A.C.; and \$1,000 for violation of Rule 62-6600.410, F.A.C.

8. Respondent agrees to pay the Department stipulated penalties in the amount of \$1,000 per day for each and every day Respondent fails to timely comply with any of the requirements of paragraph(s) 5 and 6 of this Order. The Department may demand stipulated penalties at any time after violations occur. Respondent shall pay stipulated penalties owed within 30 days of the Department's issuance of written demand for payment and shall do so as further described in paragraph nine, below. Nothing in this paragraph shall prevent the Department from filing suit to specifically enforce any terms of this Order. Any stipulated penalties assessed under this paragraph shall be in addition to the civil penalties agreed to in paragraph seven of this Order.

9. Respondent shall make all payments required by this Order by cashier's check, money order or on-line payment. Cashier's check or money order shall be made payable to the "Department of Environmental Protection" and shall include both the OGC number assigned to this Order and the notation "Water Quality Assurance Trust Fund." Online payments by e-check can be made by going to the DEP Business Portal at: <http://www.fldepportal.com/go/pay/>. It will take a number of days after this order becomes final, effective and filed with the Clerk of the Department before ability to make online payment is available.

10. Except as otherwise provided, all submittals and payments required by this Order shall be sent to Megan Ticknor, Southeast District, Department of Environmental Protection, 3301 Gun Club Road, MSC 7210-1, West Palm Beach, Florida 33406.

11. Respondent shall allow all authorized representatives of the Department access to

the Facility and the Property at reasonable times for the purpose of determining compliance with the terms of this Order and the rules and statutes administered by the Department.

12. In the event of a sale or conveyance of the Facility or of the Property upon which the Facility is located, if all of the requirements of this Order have not been fully satisfied, Respondent shall, at least 30 days prior to the sale or conveyance of the Facility or Property, (a) notify the Department of such sale or conveyance, (b) provide the name and address of the purchaser, operator, or person(s) in control of the Facility, and (c) provide a copy of this Order with all attachments to the purchaser, operator, or person(s) in control of the Facility. The sale or conveyance of the Facility or the Property does not relieve Respondent of the obligations imposed in this Order.

13. If any event, including administrative or judicial challenges by third parties unrelated to Respondent, occurs which causes delay or the reasonable likelihood of delay in complying with the requirements of this Order, Respondent shall have the burden of proving the delay was or will be caused by circumstances beyond the reasonable control of Respondent and could not have been or cannot be overcome by Respondent's due diligence. Neither economic circumstances nor the failure of a contractor, subcontractor, materialman, or other agent (collectively referred to as "contractor") to whom responsibility for performance is delegated to meet contractually imposed deadlines shall be considered circumstances beyond the control of Respondent (unless the cause of the contractor's late performance was also beyond the contractor's control). Upon occurrence of an event causing delay, or upon becoming aware of a potential for delay, Respondent shall notify the Department by the next working day and shall, within seven calendar days notify the Department in writing of (a) the anticipated length and cause of the delay, (b) the measures taken or to be taken to prevent or minimize the delay, and (c) the timetable by which Respondent intends to implement these measures. If the parties can agree that the delay or anticipated delay has been or will be caused by circumstances beyond the reasonable control of Respondent, the time for performance hereunder shall be extended. The agreement to extend compliance must identify the provision or provisions extended, the new compliance date or dates, and the additional measures Respondent must take to avoid or minimize the delay, if any. Failure of Respondent to comply with the notice requirements of this paragraph in a timely manner constitutes a waiver of Respondent's right to request an extension of time for compliance for those circumstances.

14. The Department, for and in consideration of the complete and timely performance by Respondent of all the obligations agreed to in this Order, hereby conditionally waives its right to seek judicial imposition of damages or civil penalties for the violations described above up to the date of the filing of this Order. This waiver is conditioned upon Respondent's complete compliance with all the terms of this Order.

15. This Order is a settlement of the Department's civil and administrative authority arising under Florida law to resolve the matters addressed herein. This Order is not a settlement of any criminal liabilities which may arise under Florida law, nor is it a settlement of any violation which may be prosecuted criminally or civilly under federal law. Entry of this Order does not relieve Respondent of the need to comply with applicable federal, state, or local laws, rules, or ordinances.

16. The Department hereby expressly reserves the right to initiate appropriate legal action to address any violations of statutes or rules administered by the Department that are not specifically resolved by this Order.

17. Respondent is fully aware that a violation of the terms of this Order may subject Respondent to judicial imposition of damages, civil penalties up to \$15,000.00 per day per violation, and criminal penalties.

18. Respondent acknowledges and waives its right to an administrative hearing pursuant to sections 120.569 and 120.57, F.S., on the terms of this Order. Respondent also acknowledges and waives its right to appeal the terms of this Order pursuant to section 120.68, F.S.

19. Electronic signatures or other versions of the parties' signatures, such as .pdf or facsimile, shall be valid and have the same force and effect as originals. No modifications of the terms of this Order will be effective until reduced to writing, executed by both Respondent and the Department, and filed with the clerk of the Department.

20. The terms and conditions set forth in this Order may be enforced in a court of competent jurisdiction pursuant to sections 120.69 and 403.121, F.S. Failure to comply with the terms of this Order constitutes a violation of section 403.161(1)(b), F.S.

21. This Consent Order is a final order of the Department pursuant to section 120.52(7), F.S., and it is final and effective on the date filed with the Clerk of the Department unless a Petition for Administrative Hearing is filed in accordance with Chapter 120, F.S. Upon

the timely filing of a petition, this Consent Order will not be effective until further order of the Department.

22. Persons who are not parties to this Consent Order, but whose substantial interests are affected by it, have a right to petition for an administrative hearing under sections 120.569 and 120.57, Florida Statutes. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition concerning this Consent Order means that the Department's final action may be different from the position it has taken in the Consent Order.

The petition for administrative hearing must contain all the following information:

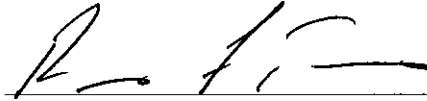
- a) The OGC Number assigned to this Consent Order;
- b) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding;
- c) An explanation of how the petitioner's substantial interests will be affected by the Consent Order;
- d) A statement of when and how the petitioner received notice of the Consent Order;
- e) Either a statement of all material facts disputed by the petitioner or a statement that the petitioner does not dispute any material facts;
- f) A statement of the specific facts the petitioner contends warrant reversal or modification of the Consent Order;
- g) A statement of the rules or statutes the petitioner contends require reversal or modification of the Consent Order; and
- h) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Consent Order.

The petition must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS# 35, Tallahassee, Florida 32399-3000 or received via electronic correspondence at Agency_Clerk@floridadep.gov, within 21 days of receipt of this notice. A copy of the petition must also be mailed at the time of filing to the District Office at Megan Ticknor, Southeast District, Department of Environmental Protection, 3301 Gun Club

Road, MSC 7210-1, West Palm Beach, Florida 33406. Failure to file a petition within the 21-day period constitutes a person's waiver of the right to request an administrative hearing and to participate as a party to this proceeding under sections 120.569 and 120.57, Florida Statutes. Before the deadline for filing a petition, a person whose substantial interests are affected by this Consent Order may choose to pursue mediation as an alternative remedy under section 120.573, Florida Statutes. Choosing mediation will not adversely affect such person's right to request an administrative hearing if mediation does not result in a settlement. Additional information about mediation is provided in section 120.573, Florida Statutes and Rule 62-110.106(12), Florida Administrative Code.

23. Rules referenced in this Order are available at <http://www.dep.state.fl.us/legal/Rules/rulelist.htm>.

FOR THE RESPONDENT:



Ronald F. Passaggio
Palm Beach Country Club

9/14/21
Date

DONE AND ORDERED this 30th day of September, 2021, in ~~Palm Beach~~ ^{Orange} County, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Jason Andreotta
Director
Southeast District

Filed, on this date, pursuant to section 120.52, F.S., with the designated Department Clerk,
receipt of which is hereby acknowledged.



Clerk

September 30, 2021
Date

Copies furnished to:
Lea Crandall, Agency Clerk
Mail Station 35

EXHIBIT A

QUALITY ASSURANCE CHECKLISTS

Calibration/Verification Logs QA Checklist
Field Sheets and Chain of Custody QA Checklist

QA AUDIT CHECKLIST
Mon. Group: _____
Facility ID: _____
Sample ID: _____
Audit Date: _____
Sample Date: _____
Auditor: _____

Calibration/Verification Logs (Check for the following field tests; pH, conductivity, DO, temperature, turbidity, chlorine) DEP SOP FT series and FD 4000			
#	Questions	Y	N
4.13	Calibrations.	<input type="checkbox"/>	<input type="checkbox"/>
4.14	Verifications.	<input type="checkbox"/>	<input type="checkbox"/>
4.15	Dates and times for all events.	<input type="checkbox"/>	<input type="checkbox"/>
4.16	Value and Unit of Standard.	<input type="checkbox"/>	<input type="checkbox"/>
4.17	Acceptance criteria for calibrations/verifications.	<input type="checkbox"/>	<input type="checkbox"/>
4.18	Indication of whether calibrations/verifications passed.	<input type="checkbox"/>	<input type="checkbox"/>
4.19	Who conducted maintenance or calibrations	<input type="checkbox"/>	<input type="checkbox"/>
4.20	Unique identifier for sonde/probes.	<input type="checkbox"/>	<input type="checkbox"/>
4.21	Last maintenance and cleaning.	<input type="checkbox"/>	<input type="checkbox"/>
4.22	Corrective actions and dates.	<input type="checkbox"/>	<input type="checkbox"/>
	Did successful verifications bracket sample measurements?		
4.23	Chronological bracket-verified before and after the sampling event.	<input type="checkbox"/>	<input type="checkbox"/>
4.24	Quantitative bracket- verified or calibrated with a standard higher and lower than the sample result.	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

QA AUDIT CHECKLIST
Mon. Group: _____
Facility ID: _____
Sample ID: _____
Audit Date: _____
Sample Date: _____
Auditor: _____

FIELD SHEETS AND CHAIN OF CUSTODY				
#	Questions	Y	N	NA
5.1	All information is legible and in proper spaces on forms.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	Nothing is erased/covered; errors have a single line through them & remain legible.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.3	Errors/corrections are signed and dated by the person making the changes (initials suffice if it is the custodian).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4	Name, address, contact info of the sampler.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.5	Facility and monitoring location sites sampled.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.6	Signature of the person doing the sampling is affixed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.7	Facility sampled has the permit ID information provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.8	The number of bottles collected for each analytical group is indicated and correct.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.9	Each item has a unique field sample ID.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.10	Sample point is listed for each item if collecting multiple samples of similar matrix. If multiple sites are sampled, has a unique field identifier been established for each site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.11	Total number of sample containers collected is recorded.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.12	Matrix sampled is indicated for each item (GW, WW influent, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.13	Sample type is indicated for each item (grab/composite).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.14	Sample collection time & date recorded for each sample collected (start/stop for composites, grabs, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.15	Required field parameters are recorded (pH, temperature, chlorine, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.16	Container types are documented for each analytical group collected.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.17	Type of sample preservation is recorded for each type of analytical group collected (ice, chemical name, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.18	Lot numbers and expiration dates of preservatives is documented.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.19	Sample kit ID is noted if containers are pre-preserved.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.20	Sample temperature is recorded at time of receipt.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.21	Lab analyses to be done are listed for each item.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.22	Custody & preservation are recorded for grabs to be composited.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.23	"Relinquished by" shows person's name, affiliation, date & time for each item.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.24	"Received by" shows person's name, affiliation, date & time for each item.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.25	Name of shipping service if commercially shipped.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5.26	COC transfers from receiving lab to other sites are fully documented.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.27	Time from sampling completion to receipt by lab is within required holding times.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS:

QA AUDIT CHECKLIST
Mon. Group: _____
Facility ID: _____
Sample ID: _____
Audit Date: _____
Sample Date: _____
Auditor: _____

FINAL LAB REPORT				
#	Question	Y	N	NA
6.1	Report has a title indicating that it contains analysis results.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.2	Lab's DOH Certification number is provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.3	Name, address, contact info for lab is provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.4	Location and contact information of overflow lab for tests being done at another lab.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.5	The total number of pages is noted, either on the cover or on each page.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.6	Name & address of the client and the project name (if any) are listed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.7	Name, function, & signature of person(s) authorizing the report.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.8	Date report was issued is provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.9	A statement is provided that the results relate only to the samples listed in report.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.10	Report certifies that test results meet all DOH requirements or explains why not.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.11	Each sample & its condition is clearly described and has a unique lab sample ID #.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.12	Each sample is associated with a client identification code.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.14	Date & time of collection are noted for each sample.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.15	Date of sample receipt by lab is noted where it affects a results validity.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.16	Date of analysis is recorded for each parameter.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.17	Time of sample prep/analysis is recorded if holding time for prep/analysis is ≤ 72 hours.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.18	References are made to the sampling plan and the lab's procedures where they are relevant to the validity or applicability of results.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.19	Analysis method used is listed for each parameter.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.20	Analysis results are listed for each parameter with unit measurements and reporting units (e.g., measured as $\mu\text{g/l}$ but reported as mg/l).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.21	Data calculations for dry weight or wet weight measurements is noted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.22	Any test failures are described and explained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.23	Descriptions are provided for any test method deviations, additions, or exclusions, & any specific test conditions that may have affected results.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.24	Use and definitions of data qualifiers are explained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.25	If quality system requirements are not met, report states what requirements were not met with data qualifiers and chemist narrative comments (see lab report comments).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6.26	Report identifies test results from those samples that did not meet DOH requirements.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.27	Report includes opinions & interpretations as appropriate & needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.28	Report includes additional information as required by specific methods, clients, or client groups.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.29	Lab has qualified the numerical results with values outside the working range.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS: