FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
BOB MARTINEZ CENTER
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

VIA EMAIL

March 13, 2015

Barbara Albrecht
Bream Fisherman's Association
1203 North 16th Avenue
Pensacola, FL 32503

Subject: Final Report for Field Performance Audit of Bream Fisherman's Association February 2, 2014; OGC Case No. 15-0060.

Dear Ms. Albrecht:

Thank you for responding to the preliminary audit report for the Field Performance Audit of Bream Fisherman's Association (BFA). The Department has reviewed your response and determined that the proposed corrective actions are acceptable, pending confirmation by the Northwest District sampling staff that these actions have been implemented. The details of the Department's review are provided in the enclosed audit findings table.

Also enclosed is the final audit report detailing the timelines for implementation of the proposed corrective actions and the Department's recommendation for usability of the data. As noted in the report, the Department recommends that the BFA field-testing data collected between November 4, 2007 and the effective date of corrective actions only be used for the Planning List assessment, while field-testing data collected prior to November 4, 2007 and after the effective date of corrective actions may be used for all purposes. The Department also recommends that data resulting from the lab analyses of samples collected by BFA volunteers before the effective date of corrective actions only be used for Planning List assessment purposes. Pending confirmation of corrective actions, lab data generated from samples collected after this effective date should be usable for all purposes. This report will be posted on the Department's website at http://www.dep.state.fl.us/labs/cgi-bin/reports/search.asp.

The proposed corrective actions will result in an improved quality system for BFA and facilitate your ability to demonstrate and document the quality of your data. The Department appreciates the hard work and dedication of your volunteer organization. If you have any questions or concerns about this final report, please feel free to contact Nia Wellendorf at (850)245-8190 or Michael Blizzard at (850)245-8073.

Under Chapter 120 of the Florida Statutes, the Bream Fisherman's Association, and any other person whose substantial interests are affected by the Department's agency action, may challenge the enclosed final audit report, including the corrective actions and the data usability analysis. The process to challenge any portion of this agency action is described below in the Notice of Rights section.

Notice of Rights

This action is final and effective on the date mailed (via e-mail) unless a sufficient petition for an administrative hearing is timely filed under sections 120.569 and 120.57 of the Florida Statutes as provided below. If a sufficient petition for an administrative hearing is timely filed, this agency action becomes only proposed agency action, subject to the result of the administrative review process. Therefore, on the filing of a timely and sufficient petition, this action will not be final and effective until further order of the Department. Because an administrative hearing may result in the reversal or substantial modification of this action, the petitioner is advised not to proceed until the deadlines noted below for filing a petition for an administrative hearing or request for an extension of time have expired. Mediation is not available.

A person whose substantial interests are affected by the Department's action may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received by the clerk) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

Under rule 62-110.106(4), F.A.C., a person whose substantial interests are affected by the Department's action may also request an extension of time to file a petition for an administrative hearing. The Department may, for good cause shown, grant the request for an extension of time. Requests for extension of time must be filed with the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, before the applicable deadline. A timely request for extension of time shall toll the running of the time period for filing a petition until the request is acted upon. If a request is filed late, the Department may still grant it upon a motion by the requesting party showing that the failure to file a request for an extension of time before the deadline was the result of excusable neglect.

If a timely and sufficient petition for an administrative hearing is filed, other persons whose substantial interests will be affected by the outcome of the administrative process have the right to petition to intervene in the proceeding. Intervention will be permitted only at the discretion of the presiding officer upon the filing of a motion in compliance with rule 28-106.205, F.A.C.

In accordance with rules 28-106.111(2) and 62-110.106(3)(a), F.A.C., petitions for an administrative hearing by the petitioner must be filed within 21 days of receipt of this written notice. Petitions filed by any persons who were not entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within 21 days of publication of the notice, if published, or within 21 days of receipt of the written notice, whichever occurs first. Under section 120.60(3) of the Florida Statutes, however, any person who has asked the Department for notice of agency action may file a petition within 21 days of receipt of such notice, regardless of the date of publication.

The petitioner shall mail a copy of the petition to Bream Fisherman's Association at the address indicated above at the time of filing. The failure of any person to file a petition for an administrative hearing within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 of the Florida Statutes.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the 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; and an explanation of how the petitioner's substantial interests are or will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts that the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes that the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts on which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301, F.A.C.. Under paragraphs 120.569(2)(c) and (d) of the Florida Statutes, a petition for administrative hearing must be dismissed by the agency if the petition does not substantially comply with the above requirements or is untimely filed.

This determination constitutes an order of the Department. Subject to the provisions of paragraph 120.68(7)(a) of the Florida Statutes, which may require a remand for an administrative hearing, the applicant has the right to seek judicial review of the order under section 120.68 of the Florida Statutes, by the filing of a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000; and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within 30 days from the date when the final order is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Thomas Frick, Director
Division of Environmental Assessment and Restoration
2600 Blair Stone Road
Tallahassee, FL 32399
Tel No.: (850) 245-8338

Enclosures:

Bream Fisherman's Association Field Performance Audit Report
Bream Fisherman's Association Audit Findings

Copies furnished to:

Kevin O'Donnell, DEP Watershed Assessment Section
Bradley Hartshorn, DEP Northwest Regional Operations Center
File

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this determination, including all copies, was e-mailed before the close of business on March 20, 2015, to the above listed persons.

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to 120.52(7)
Florida Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

Deborah Mezzy 3/20/15
Clerk Date

Department of Environmental Protection
Aquatic Ecology and Quality Assurance Section

Field Performance Audit Report

Final

Audit Date: February 2, 2014
Sampling Agency: Bream Fishermen Association
BFA Field Personnel: Leah Oliver and Richard Olsen
Auditors: Michael Blizzard and Jennifer Claypool, DEP Aquatic Ecology and Quality Assurance Section; Jessica Rich-Zeisler (Mostyn), DEP Watershed Assessment Section
Field Locations: Escambia County Streams
Audit Requested By: DEP Watershed Assessment Section
Final Report Date: March 13, 2015

Introduction

This audit was a field performance audit of the volunteer group, Bream Fishermen Association (BFA). BFA is contracted by the Florida Department of Environmental Protection (Department) to collect water samples and field meter readings in Northwest Florida. The purpose of this audit was to assess the field sampling and field testing performance of a representative BFA sampling team, observe field documentation procedures, and examine sampling and field-testing records associated with the audited sampling event. The results of the audit have been evaluated to provide the recommendations in this report for the usability of data generated from samples collected by BFA for the listing of impaired waters under the Impaired Surface Waters Rules (Chapter 62-303, F.A.C.). The auditors assessed the potential usability of the data according to applicable criteria as outlined in rules 62-160.650 and 62-160.670, F.A.C. (Chapter 62-160, Quality Assurance), including specific Data Quality Objectives (DQOs) identified for data used to assess impairment of surface waters.

Description of Sampling Event and Audit

Routine sampling trips for BFA volunteers are scheduled for Sundays. After completion of sampling trips, the volunteers place the water quality samples in coolers with plenty of ice and secure them in a locked storage area at the Northwest District (NWD) DEP office. On Monday, a NWD Regional Operation Center (ROC) staff member prepares the samples for shipment to the DEP central lab in Tallahassee. The field measurements are conducted by BFA.

Auditors Michael Blizzard and Jennifer Claypool of the Department's Aquatic Ecology and Quality Assurance Section (AEQAS), and Jessica Rich-Zeisler (Mostyn), of the Department's Watershed Assessment Section (WAS), met the BFA samplers, Richard Olsen and Leah Oliver, at station number nine (9) and accompanied them to stations 10, 11, and 12. The meter used by BFA was calibrated and verified by the NWD staff prior to the sampling event and was returned to the NWD after the sampling event for verification. The auditors observed sampling procedures at four sites and reviewed the field sheets from BFA associated with all 16 sites for the sampling event. In addition, field meter calibration logs and sample submittal forms related to this sampling trip were requested from the NWD, so that meter calibrations and information transmitted to the laboratory could be audited after the sampling

event. The focus of this audit was on field sampling technique and field documentation for sampling and for field-testing of pH, DO, specific conductance, and temperature measurements. A copy of the audit checklist completed for this audit is available from AEQAS upon request.

Preliminary Audit Report and Implementation of Corrective Actions

A preliminary audit report was sent to Brad Hartshorn (ROC Manager) at the DEP NWD on June 23, 2014. The report included a findings table with required and suggested corrective actions. Mr. Hartshorn replied with proposed corrective actions on September 3, 2014 (see attachment). The auditors have reviewed the corrective actions and deem them acceptable, provided they are all implemented in a timely manner. Once all the corrective actions have been implemented, the NWD shall submit a report to AEQAS with the details of the actions taken.

Data Usability Statement

Surface Water Sample Data: AEQAS finds that the samples collected by BFA do not meet the Quality Assurance Requirements in Attachment B of Contract WM984. Of particular concern were the lack of field blanks and the use of multiple intermediate devices for sample collections. These issues were also noted during audits in 2007 and 2011. Therefore, AEQAS recommends that data prior to the date of acceptable implementation of corrective actions (effective date) only be used for the Planning List. Data collected after this date may be used for all purposes.

Field Testing Data: AEQAS finds that the field testing data (pH, conductivity, dissolved oxygen, temperature) collected by BFA do **not** meet the Quality Assurance Requirements in Attachment B of Contract WM984. The primary concern was a lack of bracketing in meter verifications. A prior audit in 2007 did not find any deficiencies regarding field testing data. Therefore, AEQAS recommends that the field testing data collected from November 4, 2007 until the effective date only be used for the Planning List. Data collected prior to November 4, 2007 and after the effective date (pending completion of corrective actions) may be used for all purposes.

Attachment:

Audit findings table with corrective actions

2600 Blair Stone Road, MS 6511
Tallahassee, Florida 32399-2400
www.dep.state.fl.us

Finding #	Audit Findings	SOP Reference	Required (or recommended) Corrective Actions (to be coordinated with BFA volunteers by DEP NWD and Tallahassee staff)	Corrective Actions to be implemented	DEP Comments
1	Field blanks and equipment blanks are not being collected. Samplers stated they get extra bottles with each kit but no DI water or instructions for collecting blanks. A field blank was submitted to the Central lab but the time it was collected (according to the submittal sheet) was prior to the sampling trip. It appears the field blank was collected in the lab at the district office.	FQ 1230, sections 1, 1.1, 2.1.1, and 2.2.1	Provide analyte-free water in bulk to the BFA volunteers for each sampling trip. Instruct volunteers about required field and equipment blank collection procedures per FQ 1211, 1212 and 1230.	NW ROC Staff will provide analyte-free water in the BFA sample kit and will instruct volunteers about required field and equipment blank collection procedures and demonstrate proper techniques during the planned classroom/hands on Surface Water Sample Training session to be conducted by staff and volunteers.	This corrective action is acceptable and will be considered complete upon confirmation from the NWD-ROC that the training took place and these procedures have been implemented.
2	At site 9 the type of sampling equipment used to collect the samples (a stainless steel bucket, intermediate sample container and transfer funnel) was not recorded. Sites 11 and 12 were marked "other".	FD 5000 section 2.13	Instruct BFA volunteers about proper completion of field forms. Promptly note actual equipment used for collection at the time the sample is taken to prevent recall mistakes or omissions. Make sure all intermediate devices used to collect the sample are noted on the field form. Provide a description of equipment used if "other" prompt is marked.	NW ROC Staff will emphasize this during the planned classroom/hands on Surface Water Sample Training session to be conducted by staff for the volunteers.	This corrective action is acceptable and will be considered complete upon confirmation from the NWD-ROC that the training took place and these procedures have been implemented.
3	Efforts were not sufficient to prevent cross contamination. A funnel was inserted into the sample bottle. The funnel was only rinsed once and only on the inside at two sites, as observed by the auditors. At site 9, the sampler placed fingers/hand inside the bucket after the last site water rinse, before collecting sample. Sand on bucket lanyard noted by auditor at site 11.	FS 1002, sections 1.1 and 1.1.1; FS 1003, section 3; FS 1004; and FS 2110, sections 1.1.2.1 and 1.1.2.3	Provide BFA volunteers with an appropriate intermediate device for sample collection, such as a horizontal sampler, and include a lanyard reel. Provide instruction for use of the horizontal sampler, for rinsing or cleaning the sampler and for collecting equipment blanks with the sampler. Rinse all reused intermediate devices used to transfer the sample 3 times with sample water on all surfaces contacting the sample. Do not touch cleaned or rinsed sample contact surfaces of intermediate devices.	NW ROC Staff will provide a Van Dorn (Alpha Bottle) in the BFA sample kit and will demonstrate proper use during the planned classroom/hands on Surface Water Sample Training session to be conducted by staff for the volunteers.	This corrective action is acceptable and will be considered complete upon confirmation from the NWD-ROC that the training took place and these procedures have been implemented.
4	Bottom sediments were collected with the sample at site 12. The water was too shallow for collecting the sample with a bucket.	FS 2100 section 2.3	In general, avoid disturbing bottom sediments or entraining sediments into water sample during collection. Coordination with BFA volunteers is recommended to provide instruction and criteria for site conditions, such as low flow or shallow depth, that may require postponement of sample collection. Use of a horizontal sampler may allow sample collection at some shallow bridge sites. If unrepresentative conditions must be sampled, note conditions on field form. Coordination between BFA, NWD DEP staff and Tallahassee (TLH) DEP staff is recommended for removing some sites and/or selecting possible alternative sampling sites near bridge crossings that may be more representative and appropriate for sample collection.	NW ROC Staff will emphasize this during the planned classroom/hands on Surface Water Sample Training session to be conducted by staff for the volunteers.	This corrective action is acceptable and will be considered complete upon confirmation from the NWD-ROC that the training took place and these procedures have been implemented.
5	Samples at sites 9 and 11 were taken from the downstream side of a bridge. Field-testing measurements were taken from the downstream side at sites 9, 11 and 12.	FS 2100 section 2.6	Instruct BFA volunteers to collect samples and perform field-testing measurements on the upstream side of bridges, away from bridge piles. If necessary because of site conditions, note downstream side collection of samples from bridges in the field documentation. Coordination between BFA, NWD DEP staff and TLH DEP staff is recommended for removing some sites and/or selecting possible alternative sampling sites near bridge crossings that may be more representative and appropriate for sample collection.	NW ROC Staff will emphasize this during the planned classroom/hands on Surface Water Sample Training session to be conducted by staff for the volunteers.	This corrective action is acceptable and will be considered complete upon confirmation from the NWD-ROC that the training took place and these procedures have been implemented.
6	A stainless steel bucket was used to collect the sample at sites 9, 11, and 12, which causes the surface to be skimmed. In clear running water this may not be an issue; the water was flowing swiftly and no surface scum or floating particles were noted at the collection locations for these sites, but use of a bucket may make avoidance of surface material difficult, and an alternative sampling method may be needed.	FS 2110 section 1.1	Provide BFA volunteers with an appropriate intermediate device for sample collection, such as a horizontal sampler, and include instructions for use.	NW ROC Staff will provide a Van Dorn (Alpha Bottle) in the BFA sample kit and will demonstrate proper use during the planned classroom/hands on Surface Water Sample Training session to be conducted by staff and volunteers.	This corrective action is acceptable and will be considered complete upon confirmation from the NWD-ROC that the training took place and these procedures have been implemented.
7	The sample bottle was not inverted prior to submerging at site 10.	FS 2110, section 1.1.1.1	Follow inversion procedure per FS 2110 instructions, and orient container opening upstream into oncoming flow to fill with sample water.	NW ROC Staff will emphasize this during the planned classroom/hands on Surface Water Sample Training session to be conducted by staff for the volunteers.	This corrective action is acceptable and will be considered complete upon confirmation from the NWD-ROC that the training took place and these procedures have been implemented.

Finding #	Audit Findings	SOP Reference	Required (or recommended) Corrective Actions (to be coordinated with BFA volunteers by DEP NWD and Tallahassee staff)	Corrective Actions to be implemented	DEP Comments
8	The depth of the water was estimated at 3 sites but not recorded as an estimate on the field sheets. Documentation of sampling depths was unclear.	FD 5100, section 4	For sampling depths, coordination with BFA volunteers is recommended to provide instruction in order to clarify the meaning and use of field form prompts for depths. This will include ensuring that samplers record the actual sampling depth where prompted on the form, or verify any pre-printed sampling depths indicated on forms. Sampling and field-testing depth for surface samples should be in the top 12 inches, unless otherwise directed by the sampling plan, and depth of collection in the top 12 inches should be marked as "surface" on the field form. Measure actual sampling depths and total depths where necessary using appropriate equipment and procedures, and indicate estimated depths where applicable. Measure depths with marked lanyard or sonde cable, measuring tape or other graduated sounding device, or with sonde equipped with calibrated depth sensor. Effect of current on depth measurement may require weighted sounding device. Coordination between NWD DEP staff and Tallahassee DEP staff is recommended for deciding whether depth measurements of any type are necessary, and at what depth samples should be routinely collected.	NW ROC Staff will emphasize this during the planned classroom/hands on Surface Water Sample Training session to be conducted by staff for the volunteers.	This corrective action is acceptable and will be considered complete upon confirmation from the NWD-ROC that the training took place and these procedures have been implemented.
9	At site 11, bucket site water rinses were discarded on the bridge road surface near a storm water drain hole, where some of the rinse water drained back into the river near the sampling location. Sand and road dirt was observed surrounding the drain hole. The sampler noticed this occurrence after the first rinse discard, and directed the remaining rinses away from the hole.	FS 2110, section 1.1.2.1	All BFA samplers should exercise care to avoid discarding site water rinses of intermediate sampling devices near sampling collection areas.	NW ROC Staff will emphasize this during the planned classroom/hands on Surface Water Sample Training session to be conducted by staff for the volunteers.	This corrective action is acceptable and will be considered complete upon confirmation from the NWD-ROC that the training took place and these procedures have been implemented.
10	Samples were not adequately placed in wet ice at site 9 with sufficient ice for immediate cooling. Sampler was instructed by auditor to ensure adequate ice volume is placed in the ice chest with collected samples, and that containers are submerged. Sampler added more ice from stock cooler to cover containers, and rearranged the containers to submerge them.	FS1006 section 5.1 & 5.2	Where cooling is required for sample preservation, ensure that all samples are submerged in sufficient wet ice to begin immediate cooling within 15 minutes of sample collection.	NW ROC Staff will emphasize this during the planned classroom/hands on Surface Water Sample Training session to be conducted by staff for the volunteers.	This corrective action is acceptable and will be considered complete upon confirmation from the NWD-ROC that the training took place and these procedures have been implemented.
11	Field-testing measurements were taken with the sonde touching or lying on the stream bottom at site 10. Flowing water and a sandy bottom were noted at the measurement site.	FT 1500, section 2.6	In general, field-testing measurements on or very near the bottom of the water body are not recommended. Dissolved oxygen measurements in particular may be affected by anoxic conditions near sediments. If measurement must be made in shallow conditions with the sonde on the bottom, this should be noted on the field form.	NW ROC Staff will emphasize this during the planned classroom/hands on Surface Water Sample Training session to be conducted by staff for the volunteers.	This corrective action is acceptable and will be considered complete upon confirmation from the NWD-ROC that the training took place and these procedures have been implemented.
12	BFA volunteer samplers did not have written reference material available for field use, if needed for consultation about DEP SOP requirements and criteria.	N/A	Provide laminated copies of appropriate training presentation pages for field use. This reference material can be kept with the reusable sampling equipment and shared among volunteer teams. DEP NWD and TLH staff can coordinate about possible future development of a BFA sampling manual as a replacement for the training reference.	NW ROC Staff will provide laminated copies of all training presentations and appropriate SOPs.	Please submit a copy of this manual to the AQEA staff in Tallahassee (non-laminated is fine).

Finding #	Audit Findings	SOP Reference	Required (or recommended) Corrective Actions (to be coordinated with BFA volunteers by DEP NWD and Tallahassee staff)	Corrective Actions to be implemented	DEP Comments
	Findings for field-testing meter calibration and verification procedures performed by DEP Northwest District staff				
1	Field-testing records did not meet the following DEP SOP requirements for some audited items: [1] The date of receipt and date of first use are not recorded for standards used for calibration and verification. [2] All acceptable initial calibrations and calibration verifications were not documented and linked to the field measurements for the sampling project. [3] Date and time of each initial calibration and calibration verification - time is not always recorded for calibrations and verifications. [4] Instrument reading or result (display value) for all calibration verifications, with appropriate measurement units - the result is not always clearly marked; some readings appear to be in the wrong column in the log book. [5] Names of analysts performing each calibration for the instrument - Analysts' initials are not always present. [6] The acceptance criteria for each calibration and verification used to accept the instrument calibration or verification - Acceptance criteria not always present and sometimes placed in post reading column without labeling as acceptance criteria. [7] Positive indication in the record of acceptable (successful) initial calibration and acceptable initial and continuing calibration verifications Positive indication of all failed calibrations or verifications - Successful calibration not recorded, acceptable CCV sometimes recorded. There is no indication if a verification passed or failed. [8] Date and time of all corrective actions performed on the instrument prior to attempting re-verification or recalibration of the instrument are linked to the records required for preventive maintenance. Any instances of discontinuation of use of the instrument due to calibration or verification failures - Corrective actions are not clearly linked with preventative maintenance records and instances of discontinuation of use are not clearly marked with dates.	FD 1100, section 1.2; FD 4100, section 1.1; FD 4100, sections 2.1 - 2.11	Ensure that sufficient documentation is maintained to meet DEP SOP requirements and allow independent reconstruction of all calibrations and verifications.	FDEP meter calibration form, formerly Form FD9000-8, will be incorporated in all meter calibration logbooks to insure that sufficient documentation is maintained to meet DEP SOP requirements and allow independent reconstruction of all calibrations and verifications. Acceptance criteria for pH standards with applicable acceptable ranges, conductivity standards with applicable acceptable ranges, and Dissolved Oxygen Saturation chart with published temperatures at sea level are posted on the wall in the meter calibration room. At the time of audit, circling of Pass or Fail indicated that these charts were referenced.	Circling pass or fail is acceptable. At the time of this audit not all staff were doing so for for all calibrations and calibration checks.
2	An initial calibration verification (ICV) was not performed immediately following the calibration for DO, pH, and Specific Conductance	FT 1000, section 2.2.4	Perform ICVs as required by the DEP SOPs.	NW ROC Staff will perform the ICVs as required by the DEP SOPs.	Acceptable
3	No records of temperature sensor verification for the YSI sonde were available.	FT 1400 section 2.2.2.1	Perform temperature verifications per DEP SOP requirements.	NW ROC will purchase a NIST thermometer with certification of calibration and perform annual temperature verification of all meters	Acceptable once AEQAS receives confirmation that the thermometer has been purchased and is now in use.
4	A verified, quantitative bracket was not established for some sample pH measurements for the sampling trip. pH buffers 4 and 7 were used for calibration and verifications, however, some sample results were greater than pH 7 (sites 3, 14, 16: auditors not present for these).	FT 1000, sections 2.1.5 & 2.2.2, FT 1100 sections 2.3.2.2	Ensure that required quantitative verification brackets are established for all sample measurements.	NW ROC Staff will ensure that required quantitative verification brackets are established for all samples taken and linearity established as needed in relation to pH range of samples in project. If pH range of samples are higher and lower than 7 standard (pH values reported for samples audited varied less than 1 SU, higher and lower, from standard verified), both the 10 standard and 4 standard will be verified.	Acceptable
5	Sample measurements were not qualified as estimated ("J" data qualifier code) when the instrument calibration could not be verified or otherwise when a quantitative bracket was not established per DEP SOP requirements. An explanatory narrative was not provided in the field record for all sample "J" values (noted for some audited measurements for pH and specific conductance).	FT 1000, section 2.2.5.4	Qualify all sample measurements associated with failed or missing verifications per DEP SOP requirements.	This is requirement for field measurements became known to NW ROC Staff in recent months when reviewing SOP's. Data for audited sampling event has been retrieved from STORET and reloaded with "J" qualifier and "Missing Verification" comment. Record review for similar updates is ongoing. All sample measurements will be qualified in the future.	Acceptable
6	A verified, chronological and quantitative bracket was not established for some sample specific conductance measurements for the sampling trip.	FT 1000, sections 2.1.4 & 2.2.1; FT 1200, section 3.2.2.2	Ensure that required quantitative verification brackets are established for all sample measurements.	NW ROC Staff will ensure that required quantitative verification brackets are established for all samples taken.	Acceptable