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Inspector General

OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY



Inspector General
Accredited

Enhancing Public Trust in Government

Audit Report
2026-A-0005
Village of Golf - Water Quality
Reporting Review
August 24, 2026

Insight – Oversight – Foresight



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VILLAGE OF GOLF - WATER QUALITY REPORTING REVIEW

SUMMARY

WHAT WE DID

We conducted a Water Quality Reporting review of the Village of Golf (Village). This review was performed as part of the Office of Inspector General (OIG), Palm Beach County 2026 Annual Audit Plan.

Our review focused on coliform bacteria testing activities, laboratory results, and related reporting from October 1, 2024 through April 30, 2026.

WHAT WE FOUND

We found that the Village reported coliform bacteria testing results to the Florida Department of Health (FDOH) in compliance with State of Florida reporting requirements, and that the Village's contracted certified laboratory provided testing results directly to the FDOH. However, the Village did not always collect coliform bacteria samples in compliance with its written sample siting plan.

The Village did not always collect bacteriological samples from the locations specified in the sample siting plan, as required.

We found that six (6) of the 134 water samples we reviewed were collected from a location that differed from the sample

siting plan. Village personnel collected samples from the incorrect location because the preprinted sampling forms provided by the laboratory contained an incorrect address for one of the designated sampling locations.

Corrective Action

During the review, on June 24, 2026, the laboratory provided the Village with a revised laboratory reporting form that correctly identified that sample location. The revised form will be used for future sample collections.

WHAT WE RECOMMEND

Our report contains one (1) finding and provides one (1) recommendation. Implementation of the recommendation will help ensure that the Village collects all required water samples from the locations identified in its approved sampling plan.

The Village has concurred and accepted our recommendation. We have included the Village's management response as Attachment 1.

BACKGROUND



The Village was incorporated in 1957. The Charter of the Village was enacted by the Laws of Florida in the year of incorporation. The Village's estimated population in 2025 was 284.

The Village operates under the council-manager form of government. The Village consists of five (5) councilmembers elected at large. The Village Council appoints one of the councilmembers to serve as the Mayor and another to serve as Vice-Mayor. The Mayor is the chief executive officer of the Village for enforcement of the laws and ordinances of the Village, under the overall supervision of the Council, and with the aid of the Manager. The Village Manager, who is appointed by the Council, is the administrative head of the Village and is subject to the direction and supervision of the Council.

The OIG Fiscal Year 2026 Audit Plan included multiple entities selected for water quality reporting reviews. These water quality reporting reviews were included because providing safe water is a core mission of public water systems.¹ Additionally, a recent OIG investigation² identified over 100 instances where an employee of a local municipal public water system repeatedly and intentionally failed to report total coliform testing results to the FDOH and provided false, altered, or misleading information to the FDOH, resulting in possible contamination within the water distribution system³. We selected the Village of Golf for review because it operates a water utility and based on the results of our prior cross-connection program audit⁴ wherein the OIG found that the Village's controls were not adequate for 1) ensuring backflow prevention devices were inspected annually, 2) maintaining an up-to-date and accurate master device list for backflow devices, and 3) verifying compliance with the Village's Water Utility Cross-Connection Control Program.

The Village's Water System

The Village's Utilities Department is responsible for the daily operation of the Village's water system. The Village obtains its drinking water from the East Coast Surficial Aquifer, drawing raw groundwater through three (3) wells. The Utility Facility consists of three (3) wells, two (2) storage tanks, and a nanofiltration water treatment plant. The Village supplies drinking water to its residents and the following subdivisions: Quail Ridge South, Delray Dunes, Indian Hills, portion of Indian Springs, Brookside, and the Village Square Shopping Plaza. According to the Environmental Protection Agency's Safe Drinking Water Information System (SDWIS), the Village's public water system serves a population of 3,505.

¹ "Public water system" means a system for the provision to the public of water for human consumption through pipes or other constructed conveyances, if such system has at least 15 service connections or regularly serves at least 25 individuals daily at least 60 days out of the year.

² https://pbc.gov/oig/docs/reports/11-18-24-Riviera_Beach_Failure_to_Report_Water_Contamination-2024-0006.pdf

³ "Water distribution system" means those components of a public water system used in conveying water for human consumption from the water treatment plant to the consumer's property, including pipes, tanks, pumps, and other constructed conveyances. §403.866(5), Florida Statutes

⁴ https://pbc.gov/oig/docs/reports/06-26-19-Golf-Cross-Connection_Program_Audit-2019-A-0006.pdf

The Village operates a community public water system⁵ and as a supplier of water,⁶ is responsible for compliance with the provisions of the Safe Water Drinking Act and applicable state safe drinking water laws and regulations.

Florida's Safe Drinking Water Act Program

Congress originally passed the Federal Safe Drinking Water Act (SDWA) in 1974 to protect public health by regulating the nation's public drinking water and its sources – rivers, lakes, reservoirs, springs, and ground water wells. The United States Environmental Protection Agency (EPA) administers the SDWA.

The SDWA gives primary responsibility for public water¹ system programs to states to implement the program. The Florida legislature enacted the Florida Safe Drinking Water Act (sections 403.850-.864, Florida Statutes (F.S.)) and gave the Florida Department of Environmental Protection (FDEP) authority to serve as the primary agency responsible for enforcing the SDWA and the authority to adopt and enforce the Florida Safe Drinking Water Act drinking water regulations (Chapters 62-550, 62-555, and 62-560, Florida Administrative Code (F.A.C.)) that are no less stringent than the SDWA. FDEP has delegated the safe drinking water program to county health departments in six Florida counties. In Palm Beach County, the authority for the regulation of public water systems has been delegated to the Florida Department of Health (FDOH) in Palm Beach County⁷.

Coliforms

Currently, approximately 90 contaminants are regulated under National Primary Drinking Water Regulations (NPDWR)⁸, established by the EPA. Total coliforms are a group of related bacteria found in plant material, water, and soil. Coliforms are also present in the digestive tracts and feces of humans and animals. Most of these bacteria are not harmful to humans. The EPA considers total coliforms a useful indicator of possible water contamination from other pathogens. Measurement of total coliforms is used to determine the adequacy of water treatment and the integrity of the distribution system.⁹

OBJECTIVES, SCOPE, AND METHODOLOGY

The overall objectives of the review were to determine whether:

- Coliform bacteria testing results reported to the Florida Department of Health (FDOH) were in compliance with the public water system's written sample siting plan;
- Coliform bacteria testing results reported to FDOH were in compliance with State of Florida reporting requirements; and
- Testing results provided by the certified laboratory were reported to the FDOH.

⁵ A "community water system" is a public water system that serves the same people year-round. Under Florida law, this means a system that serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents. 40 CFR § 141.2; § 403.852(3), Florida Statutes

⁶ A "supplier of water" means any person who owns or operates a public water system. 40 C.F.R. § 141.2; §403.852(8), Florida Statutes

⁷ Section 403.862(1) (c), F.S.

⁸ 40 CFR, Part 141

⁹ <https://www.epa.gov/dwreginfo/revised-total-coliform-rule-and-total-coliform-rule>

The scope of the review included, but was not limited to, coliform bacteria testing activities, laboratory results, and related reporting from October 1, 2024 through April 30, 2026.

The review methodology included but was not limited to:

- Review of federal guidelines under the SDWA, Florida Statutes, ordinances, policies, procedures, contracts, agreements, and related requirements;
- Completion of a process walk-through related to water quality testing activities, results, and reporting;
- Interview of appropriate personnel;
- Review of records, logs, laboratory testing results, reports, and regulatory submissions; and
- Detailed testing of selected laboratory samples, results, and regulatory submissions.

This review was conducted in accordance with Principals and Standards for Offices of Inspector General. Those standards require that we plan and perform the review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our review objectives. We believe that the evidence we obtained provides a reasonable basis for our findings and conclusions based on our review objectives.

FINDINGS AND RECOMMENDATIONS

Finding (1): The Village did not always collect bacteriological samples from the locations specified in the sample siting plan, as required.

40 CFR § 141.2 Definitions, states,
As used in this part, the term:

...

Public water system means a system for the provision to the public of water for human consumption through pipes or, after August 5, 1998, other constructed conveyances, if such system has at least fifteen service connections or regularly serves an average of at least twenty-five individuals daily at least 60 days out of the year. Such term includes: any collection, treatment, storage, and distribution facilities under control of the operator of such system and used primarily in connection with such system; and any collection or pretreatment storage facilities not under such control which are used primarily in connection with such system. Such term does not include any "special irrigation district." A public water system is either a "community water system" or a "noncommunity water system."

40 CFR § 141.21 Coliform sampling, states,
(a) Routine monitoring.

- (1) Public water systems must collect total coliform samples at sites which are representative of water throughout the distribution system according to a written sample siting plan. These plans are subject to State review and revision.

40 CFR § 141.853, General monitoring requirements for all public water systems, states,

(a) Sample siting plans.

- (1) Systems must develop a written sample siting plan that identifies sampling sites and a sample collection schedule that are representative of water throughout the distribution system not later than March 31, 2016. These plans are subject to State review and revision. **Systems must collect total coliform samples according to the written sample siting plan.** Monitoring required by §§ 141.854 through 141.858 may take place at a customer's premise, dedicated sampling station, or other designated compliance sampling location. Routine and repeat sample sites and any sampling points necessary to meet the requirements of subpart S must be reflected in the sampling plan. [Emphasis added]

Section 403.852, F.S. states,

- (1) "Department" means the Department of Environmental Protection, which is charged with the primary responsibility for the administration and implementation of the Florida Safe Drinking Water Act.
- (2) "Public water system" means a system for the provision to the public of water for human consumption through pipes or other constructed conveyances if such system has at least 15 service connections or regularly serves at least 25 individuals daily at least 60 days out of the year.

Section 403.853, F.S., states,

- (1) The department shall adopt and enforce:

(a)

1. State primary drinking water regulations that shall be no less stringent at any given time than the complete interim or revised national primary drinking water regulations in effect at such time; and
2. State secondary drinking water regulations patterned after the national secondary drinking water regulations.

...

- (2) Subject to the exceptions authorized pursuant to s. 403.854, state primary drinking water regulations apply to each public water system in the state, except that such regulations do not apply to any public water system which meets all of the following criteria...

...

- (3) The department shall adopt and implement adequate rules specifying procedures for the enforcement of state primary and secondary drinking water

regulations, including monitoring and inspection procedures, that comply with regulations established by the administrator pursuant to the federal act.

Rule 62-550.830(1), FA.C., Revised Total Coliform Rule, states,

- (1) The requirements contained in 40 C.F.R. Part 141, Subpart Y (Sections 141.851 through 141.861), revised as of July 1, 2014 (<http://www.flrules.org/Gateway/reference.asp?No=Ref-05605>),* are adopted and incorporated herein by reference and are enforceable under this rule, except 40 C.F.R. §§141.855(c) through (f) are not adopted or incorporated in this rule. This introductory text shall be effective on July 7, 2015.

...

*The U.S. Environmental Protection Agency has identified an error in 40 C.F.R. §141.857(d), where the correct cross reference should be to paragraph (b) instead of paragraph (a), and an error in 40 C.F.R. §141.858(a)(1), where the correct word after §141.854 should be “through” instead of “though.”

The Village of Golf Sampling Plan for Total Coliform effective March 21, 2023, states,

Village of Golf Sampling Plan for Total Coliform			
Months Sampled	Sample #	Group 1	
January	1	Well #1	
April	2	Well #2	4700 Woolbright Road
July	3	Well #3	
October			
	4A	5379 Brookview Dr. Brookside	Primary
		5367 Brookview Dr. Brookside	Upstream
		5401 Brookview Dr. Brookside	Downstream
	5A	4217A Quail Ridge Dr. Quail Ridge	Primary
		4249A Quail Ridge Dr. Quail Ridge	Upstream
		4233A Quail Ridge Dr. Quail Ridge	Downstream
	6A	11658 Dunes Rd. Delray Dunes	Primary
		11620 Dunes Rd. Delray Dunes	Upstream
		11676 Dunes Rd. Delray Dunes	Downstream
	7A	Remote Tap Park C Village of Golf	Primary
		2 Country Rd. Village of Golf	Upstream
		8 Country Rd East Village of Golf	Downstream
Village of Golf Sampling Plan for Total Coliform			
Months Sampled	Sample #	Group 2	
February	1	Well #1	
May	2	Well #2	4700 Woolbright Road
August	3	Well #3	
November			
	4B	5455 Piping Rock Dr. Indian Springs	Primary
		11419 Wingfoot Dr. Indian Springs	Upstream
		5479 Piping Rock Dr. Indian Springs	Downstream
	5B	4560 Sanderling Circle West Quail Ridge	Primary
		4552 Sanderling Ln. Quail Ridge	Upstream
		4548 Sanderling Ln. Quail Ridge	Downstream
	6B	11915 N Lake Dr. Delray Dunes	Primary
		11897 N Lake Dr. Delray Dunes	Upstream
		11933 N Lake Dr. Delray Dunes	Downstream
	7B	32 Country Rd. Village of Golf	Primary
		30 Country Rd. Village of Golf	Upstream
		34 Country Rd. Village of Golf	Downstream

Village of Golf Sampling Plan for Total Coliform			
Months Sampled	Sample #	Group 3	
March	1	Well #1	
June	2	Well #2	4700 Woolbright Road
September	3	Well #3	
December	4C	4770 S Lake Dr. Delray Dunes	Primary
		4776 S Lake Dr. Delray Dunes	Upstream
		4766 S Lake Dr. Delray Dunes	Downstream
	5C	3861 Woolbright Rd	Primary
		3841 Woolbright Rd	Upstream
		3481 Woolbright Rd	Downstream
	6C	16 Country Rd West Village of Golf	Primary
		14 Country Rd West Village of Golf	Upstream
		74 Country Rd South Village of Golf	Downstream
	7C	3549 Royal Tern Ln. Quail Ridge	Primary
		3557 Royal Tern Ln. Quail Ridge	Upstream
		3543 Royal Tern Ln. Quail Ridge	Downstream

Revised 2/11/19

We compiled and analyzed the laboratory reports for total coliform samples collected during the review period of October 1, 2024 through April 30, 2026. We identified twenty (20) laboratory reports containing 134 samples that were submitted to the FDOH.

The Village's sample siting plan requires the collection of seven (7) samples per month across three (3) location groups with each location group requiring a sample collection every three (3) months. Location Group 1 requires sampling in January, April, July, and October; Location Group 2 requires sampling in February, May, August, and November; and Location Group 3 requires sampling in March, June, September, and December.

The purpose of the sample siting plan is to specify where in the distribution system routine and repeat samples will be collected to ensure that they are representative of the water quality in a public water system. The purpose of sampling is to detect any coliform contamination so that appropriate corrective action can be taken quickly. Therefore, samples collected from locations other than those identified in the sample siting plan may not be an accurate representation of the distribution system, preventing public water system personnel from quickly identifying and addressing the source of any coliform contamination.

We obtained and reviewed the twenty (20) laboratory reports that were forwarded to the FDOH to determine if:

- the actual sampling locations were the required locations listed in the sample siting plan and
- verify any deviations were documented and justified.

We found that for the months of December 2024, March 2025, June 2025, September 2025, December 2025, and March 2026, the laboratory reports for the samples related to Sample #4C (Group 3), were collected from 4772 S. Lake Drive instead of the required sampling location of 4770 S. Lake Drive identified in the sample siting plan. The location incorrectly sampled was the property adjacent to the required sample siting plan location.

Both locations are connected to the same branch of the distribution system, indicating that the sample was collected from the same section of the distribution system.

The Village's contracted laboratory provided it with preprinted sampling forms showing the addresses of the locations where each water sample was to be collected. The Village did not verify that the preprinted form reflected the correct sampling locations for Group 3 from its sampling plan. As a result, the Village collected sample #4C from an incorrect location. Village personnel advised that they relied on the preprinted laboratory forms during sample collection and had not identified the discrepancy prior to our review.

Corrective Action

During the review on June 24, 2026, the laboratory provided the Village with a revised laboratory reporting form for group 3 that correctly identified Sample #4C as 4770 S. Lake Drive. The revised form will be used for future sample collections.

Recommendation:

- (1) The Village ensure that the laboratory-provided sampling forms report the sample locations consistent with the sample siting plan before collection.**

Management Response:

Our utility has corrected the issue and will review each Bacteriological Chain of Custody presently and moving forward to prevent a like occurrence.

ACKNOWLEDGEMENT

The Inspector General's audit staff would like to extend our appreciation to the Village of Golf's staff for their assistance and support in the completion of this review.

This report is available on the OIG website at: <https://www.pbc.gov/OIG>. Please address inquiries regarding this report to the Director of Audit by email at inspector@pbc.gov or by telephone at (561) 233-2350.

ATTACHMENT

Attachment 1 – Village of Golf's Management Response

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August 21, 2026

Hillary Brojan
Director of Audit
Inspector General Office

Mrs. Brojan,

I'd like to thank you and your office for the time your associates spent with our Utilities, especially Shonnelle Braithwait. Her professional attention to this matter put our department at ease and aided us to correct an oversight. Our utility has corrected the issue and will review each Bacteriological Chain of Custody presently and moving forward to prevent a like occurrence.

Thank you again for your time,

John Lisle

John Lisle
Utilities Superintendent
Village of Golf

C: Christine Thrower-Skinner, Village Manager
Peter B. Hamilton, Mayor