ALAMEDA COUNTY HEALTH CARE SERVICE AGENCY REBECCA GEBHART, Interim Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH LOCAL OVERSIGHT PROGRAM (LOP) For Hazardous Materials Releases 1131 HARBOR BAY PARKWAY, SUITE 250 ALAMEDA, CA 94502 (510) 567-6700 FAX (510) 337-9335

July 21, 2017

Ms. Hollis Phillips (Sent via e-mail to: <u>hollis.phillips@arcadis.com</u> Arcadis U.S. Inc. 100 Montgomery Street, Suite 300 San Francisco, CA 94104

Steve Mahoney 30 Northwest Street Yerlington, NV 89447

Khalid and Romana Usman 3670 Ralston Avenue Hillsborough, CA 94010-6734

New ERA Energy LLC 405 Camille Circle, #11 San Jose, CA 95134-2497

Subject: Fuel Leak Case No. RO0000426 and GeoTracker Global BP #11109, 4280 Foothill Blvd, Oakland, Geotracker Global ID T0600100217

Ladies and Gentlemen:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file including the following reports prepared by Arcadis on Atlantic Richfield Company, a BP affiliated company (ARCO) for the referenced case:

- January 14, 2011 Final Feasibility Study and Corrective Action Plan (FS/CAP)
- September 16, 2015 CPT/UVOST Field Investigation Report (Request for Closure [RFC])
- March 14, 2016 *CPT/UVOST Field Investigation Report Addendum* (RFC Addendum)
- July 19, 2017 Fourth Quarter 2016 and First Quarter 2017 Semi-Annual Groundwater Monitoring Report (1st Quarter 2017 Report)

ACDEH has evaluated the data in conjunction with the case files and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) general and media specific criteria. Based on ACDEH staff review, we have determined that the site does not meet the following criteria, and consequently, ACDEH must deny closure:

- General Criteria d (Free product Removal)
- General Criteria f (Secondary Source Removal)
- Media-Specific Criteria for Groundwater

At this juncture ACDEH requests that you address the Technical Comments below and submit a Data Gap Work Plan to advance the case to closure.

Ladies and Gentlemen RO0000426 July 21, 2017, Page 2

TECHNICAL COMMENTS

A summary is provided below of each of the general and media specific LTCP criteria that are not met.

1. General Criteria d (Free Product) – The LTCP requires free product to be removed to the extent practicable at release sites where investigations indicate the presence of free product by removing in a manner that minimizes the spread of the unauthorized release into previously uncontaminated zones by using recovery and disposal techniques appropriate to the hydrogeologic conditions at the site, and that properly treats, discharges, or disposes of recovery byproducts in compliance with applicable laws. Additionally, the LTCP requires that abatement of free product migration be used as a minimum objective for the design of any free product removal system.

As described in the LTCP's *Technical Justification for Vapor Intrusion (VI) Media Specific Criteria,* light non-aqueous phase liquid (LNAPL) (free product) is indicated by benzene concentrations exceeding 3,000 micrograms per liter (ug/L) and total petroleum hydrocarbon as gasoline (TPHg) concentrations exceeding 20,000 ug/L. The 1st Quarter 2017 Report indicates that free product persists in groundwater monitoring wells MW-5, MW-10, MW-11, and MW-12 located in the southern corner of the site. A measurable thickness (0.02 feet or 0.24 inch) of free product was present in well MW-12 and benzene and TPHg concentrations exceeding the LTCP's *Technical Justification for Vapor Intrusion (VI) Media Specific Criteria* were detected in wells MW-5 and MW-10 (Attachment A, Tables and Figures March 7, 2017 Groundwater Sampling Event, BP Station, 4280 Foothill Boulevard and Chevron Station, 4265 Foothill Boulevard, Oakland).

Free product has been documented in well MW-5, installed in 1991, from 1991 to 2017. Free product or benzene and TPHg concentrations exceeding the LTCP's *Technical Justification for Vapor Intrusion (VI) Media Specific Criteria* has also persisted in MW-10, MW-11, and MW-12, installed in March 2009, from 2009 to 2017. The presence of free product continues despite completion of a Dual Phase Extraction Pilot (DPE) Test in 2013 and ongoing free product removal. Consequently, ACDEH requests submittal of a Corrective Action Plan Addendum as described below in the Technical Report Request Section.

2. General Criteria f – Secondary Source Has Been Removed to the Extent Practicable – "Secondary source" is defined as petroleum-impacted soil or groundwater located at or immediately beneath the point of release from the primary source. Unless site attributes prevent secondary source removal (e.g. physical or infrastructural constraints exist whose removal or relocation would be technically or economically infeasible), petroleum-release sites are required to undergo secondary source removal to the extent practicable as described in the policy. "To the extent practicable" means implementing a cost-effective corrective action which removes or destroys-inplace the most readily recoverable fraction of source-area mass. It is expected that most secondary mass removal efforts will be completed in one year or less. Following removal or destruction of the secondary source, additional removal or active remedial actions shall not be required by regulatory agencies unless (1) necessary to abate a demonstrated threat to human health or (2) the groundwater plume does not meet the definition of low threat as described in this policy.

ACDEH's review of the case files indicates that insufficient data and analysis has been presented to assess compliance with General Criteria f. Historic data indicates the existence of at least two generations of USTs, associated piping and dispenser islands, and structures (c.1971 and c.1989). The continuous presence of free product in MW-5, MW-10, MW-11, and MW-12 indicates the existence of secondary or residual source. Additionally, examination of 1971 Mobil Oil Corporation site blueprints implies that High Street was widened in the early 1970's with High Street

encroaching over former station property potentially placing the pump islands closer to the current sidewalk at the corner of High and Foothill (Attachment B, 1971 Mobil Oil Corporation blue print). The widening of High Street may provide an explanation for the source of the unexplained free product at that corner. As you are aware, in March 2014 PG&E discovered shallow soil contamination during an excavation project in the High Street sidewalk/driveway on High Street near the corner at High Street and Foothill Boulevard. Consequently, ACDEH requests submittal of a Corrective Action Plan Addendum as described below in the Technical Report Request Section.

3. Media Specific Criteria for Groundwater – To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed in the policy.

ACDEH's review of the case files indicates that insufficient data and analysis has been presented to assess compliance with Media Specific Criteria for Groundwater. The groundwater flow direction appears to be to the southwest and has been defined by coordinated groundwater monitoring events between this case and at the neighboring Chevron Service Station, 4265 Foothill Boulevard (RO427). Historically, Chevron's upgradient groundwater monitoring well C-10, installed in 2003 and located 100 feet directly downgradient of MW-5, has not exhibited free product or benzene or TPHg concentrations suggestive of free product, and has not detected TPH in groundwater since 2003. The depth of underground utilities are unknown despite preferential pathway studies completed in 2013 and 2015. Due to the presence of numerous underground utilities beneath Foothill Boulevard as shown on figures in Attachment C, Underground Utilities, BP Station, 4280 Foothill Boulevard (RO415), the utilities may act as preferential pathways potentially for free product concentrations. This represents a vapor intrusion vapor intrusion risk to the residential and commercial properties along Foothill Boulevard and High Street. Consequently, the length and direction of the contaminant plume that exceeds water quality objectives is unknown.

Based on a review of data of groundwater monitoring events between 1991 and 2017 of MW-5, groundwater events between 2009 and 2017 of MW-10, MW-11, and MW-12, measurable free product is present and benzene and TPHg detections fluctuate one to three orders of magnitude; consequently, groundwater specific criteria requirement for a stable plume are not met. The 1st Quarter 2017 Report indicates that benzene was detected in MW-5 at 3,320 ug/L. Based on this data it appears the extent of the contaminant plume has not been adequately defined. Consequently, ACDEH requests submittal of a Corrective Action Plan Addendum as described below in the Technical Report Request Section.

TECHNICAL REPORT REQUEST

Please upload the following technical report to the ACDEH ftp site (Attention: Karel Detterman) and to the State Water Resources Control Board's GeoTracker website:

Corrective Action Plan Addendum – *A Final Feasibility Study and Corrective Action Plan* (FS/CAP) dated January 14, 2011 was approved by ACDEH in May 2011 but was not implemented. Please re-evaluate the FS/CAP and prepare a *Corrective Action Plan Addendum* (CAP Addendum) to address the technical comments listed above. Please support the scope of work with a focused Site Conceptual Model (SCM) and Data Quality Objectives (DQOs) that relate the data collection to each LTCP criteria. The CAP Addendum must include a concise background of soil and groundwater investigations performed in

Ladies and Gentlemen RO0000426 July 21, 2017, Page 4

connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The CAP Addendum should also include, but is not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and cleanup goals, in accordance with the LTCP, or appropriate San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels (ESL) guidance for all COCs, or site-specific target levels generated in a risk assessment, or the SFRWQCB Basin Plan. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the LTCP or the SFRWQCB Basin Plan. Please specify appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the CAP Addendum.

The CAP Addendum must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) besides the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action.

Public participation is a requirement for the Corrective Action Plan process. Therefore, we request that you submit a Draft CAP Addendum for ACDEH review. Upon ACDEH approval of a Draft CAP Addendum, the document should be finalized and uploaded to ACDEH's ftp site and to GeoTracker as described below. ACDEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the Draft CAP Addendum. Public comments on the proposed remediation will be accepted for a 30-day period.

• September 22, 2017 E-mailed Draft Corrective Action Plan Addendum and Updated SCM to: karel.detterman@acgov.org

Please upload the technical report to the ACDEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

• October 27, 2017 – Final Corrective Action Plan Addendum File to be named: RO426_CAP_ADEND_yyyy-mm-dd

This report is being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT (FORMER PERJURY STATEMENT)

Please note that ACDEH has updated Attachment 1 and will now require a *Submittal Acknowledgement Statement*, instead of a *Perjury Statement* as a cover letter signed by the responsible Party (RP). Please make this change to your submittals to ACDEH with the next deliverable.

The language for the Submittal Acknowledgement Statement is as follows:

"I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website."

Ladies and Gentlemen RO0000426 July 21, 2017, Page 5

Should you have any questions, please contact me at (510) 567-6708 or send me an electronic mail message at <u>karel.detterman@acqov.org</u>

Sincerely,

Karel Detterman, PG Hazardous Materials Specialist

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements / Obligations Electronic Report Upload (ftp) Instructions

Attachment A - Tables and Figures March 7, 2017 Groundwater Sampling Event, BP Station, 4280 Foothill Boulevard and Chevron Station, 4265 Foothill Boulevard, Oakland (RO427)

Attachment B - 1971 Mobil Oil Corporation blue print

Attachment C - Underground Utilities, BP Station, 4280 Foothill Boulevard, and Underground Utilities Extended Site Figure, Former Shell Service Station, 4411 Foothill Boulevard (RO415)

cc: Charles Carmel, Atlantic Richfield Company (A BP Affiliated Company), P.O. Box 1257 San Ramon, CA 94583 (Sent via E-mail to: <u>charles.carmel@bp.com</u>)

Ed Ralston, Conoco Phillips, 76 Broadway Street, Sacramento, CA 95818 (Sent via E-mail to: <u>Ed.C.Ralston@p66.com</u>)

Karel Detterman, ACDEH, (Sent via E-mail to: <u>karel.detterman@acgov.org</u>) Dilan Roe, ACDEH, (Sent via E-mail to: <u>dilan.roe@acgov.org</u>) Paresh Khatri, ACDEH, (Sent via E-mail to: <u>paresh.khatri@acgov.org</u>) Electronic File, GeoTracker

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program File Transfer Protocol (FTP) site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and <u>other</u> data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to SCP sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website (<u>http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/</u>) for more information on these requirements.

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately licensed or certified professional. For your submittal to be considered a valid technical report, you are to present site-specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this case meet this requirement. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: http://www.bpelsg.ca.gov/laws/index.shtml.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

	REVISION DATE: December 1, 2016
Alameda County Environmental Cleanup	ISSUE DATE: July 5, 2005
Oversight Programs (LOP and SCP)	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Please <u>do not</u> submit reports as attachments to electronic mail.
- Entire report including cover letter must be submitted to the ftp site as a single portable document format (PDF) with no password protection.
- It is preferable that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements must be included and have either original or electronic signature.
- <u>Do not</u> password protect the document. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. Documents with password protection <u>will not</u> be accepted.
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to <u>deh.loptoxic@acgov.org</u>.
 - b) In the subject line of your request, be sure to include "ftp PASSWORD REQUEST" and in the body of your request, include the Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.
- 2) Upload Files to the ftp Site
 - a) Open File Explorer using the Windows
 i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to <u>deh.loptoxic@acgov.org</u> notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

ATTACHMENT A

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ARCADIS DEPartment

Current Groundwater Monitoring Data 4280 Foothill Blvd, Oakland, CA 94601 CA-11109 Table 1

					Measured																
			TOC	WTO	Thickness	GW Elev	GRO	-	-		×	MTBE	TBA	DIPE	ETBE 1	TAME E	Ethanol 1.	2-DCA	EDB	8	
Well ID	Date	Type	(ft msl)	(U)	(11)	(It msl)	(hg/L)	(1)0(1)	(hg/L)	(hall)	(1)(01)	(100/07)	(100/07)	(pail.)	(uerit) ((110)	(unit.) ((uall) (i			Vistes
MW-2	3/7/2017		41.22	9.21	-	32.01	1	1	1	1	1	1	í		-	┝	-	1	-	-	e
MW-3	3/7/2017		42.92	6.91	1	36.01	-	ł	I	1	1	3,25	;	1	-	1	1		1	2.90	Ĵ
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MW-4	3/7/2017		42.88	9.26	1	33.62	<100	+	-	1	1	25.1	1	1	F		-	,		0.18	Ē
		_													-						
MW-5	3/7/2017		39.14	6.83	1	32.31	19,700	3,320	250	975	633	<100	<500	<100	<100	<100 <	<10,000 -	• 100 1∨	<100	0.23	(a
								-													
MW-6	3/7/2017		44.37	9.68	1	34.69	1	1	1	:	-	0.597 (J)	1	-	-		1	,	1	2.05	Ē
									_												
MW-7	3/7/2017		43.10	7.29	ı	35.81	995	14.8	0.52 (J)	1.95	<3.00	2.67	6.99	<1.00	<1.00	<1.00	<100	<1.00	<1.00	0.36	Ê
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MW-8	3/7/2017		40.95	7.73	1	33.22	'	1	1	1	1	1	1	1	•	1	T.		1		€
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6-MM	3/7/2017		44.06	6.91	I	37.15	1	1	1	-	1	-	\$	1	1	1	1	1	1		€
									-	-	-										
MW-10	3/7/2017		39.78	6.38	'	33.40	33,900	946	576	1,230	5,450	<100	<500	<100	<100	<100 <	<10,000	<100	<100	0.33	<u>a</u>
																				$\left \right $	
MW-11	3/7/2017		40.04	6.29	1	33.75	8,570	106	35.6	109	103	<25	<125	<25	<25	<25 <	<2,500	<25	<25 0	0.19	Ê
							_														
MW-12	3/7/2017		40.32	7.30	0.02	33.04	1	1	1	:		1	1	1	1	•	1	1	1		6
history.																					

Notes:

B = Benzene

1,2-DCA = 1,2-DicMoroethane DIPE = DI-isopropyl ether DO = Dissolved oxygen DTW = Depth to water in ft bfoc

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EDB = 1,2-Dibromomethane E = Ethylbenzene

ETBE = Ethyl tert butyl ether

GRO = Gasoline range organics, range C6-C12

GW Elev = Groundwater measured in ft msl LNAPL = Light non-aqueous phase liquid MTBE = Metryl tert butyl ether T = Toltuene TAME = Tert-amyl metryl ether TBA = Tert-butyl atcohol

TOC = Top of casing measured in ft (surveyed)

X = Xylense, total
 µg/L = Micrograms per liter
 mg/L = Milligrams per liter
 fret
 fretet
 ft bloc = feet below top of casing
 ft mal = feet relative to mean sea level
 Dup = Duplicate sample
 SHEEN = Sheen detected in well

- = Not analyzed/applicable
 - = Not analyzed/applicable/measured/ available
 < = Not defected at or above reported detection limit
 J = Estimated value between the reporting limit and method detection limit
 J3 = The associated batch QC was outside the established quality control range for precision
 (a) Sample exceeded EPA recommended holding time
 (b) Shen in well
 (c) Well not sampled due to damage during site construction
 (d) Insufficient water to sample
 (e) Blind duplicate

4280 Foothill Blvd, Oakland, CA 94601 Current Groundwater Monitoring Data CA-11109 Table 1

(1) TOC lowered
(3) Free product In well
(4) Trip Blank
(5) Hydrocarbon odor observed at wellhead
(7) Hydrocarbon odor observed at wellhead
(8) GWE adjusted assuming specific gravity of 0.75 for free product
(9) Well not sampled in accordance with groundwater sampling schedule
(10) Replaced Hydrosleeve
(20) No hydrosleeve up (10) No sample collection.
(3) No hydrosleeve up (20) No hydrosleeve to collect sample, no hydrosleeve replaced
(4) Well was inaccessible
(5) Replaced SPH sock.
(6) No hydrosleeve up (10) Replaced som (10) Replaced SPH sock.
(7) Laboratory control sample and/ or laboratory control sample duplicate exceeds the control limits

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ATTACHMENT B









ATTACHMENT C



