5500 Shellmound Street, Emeryville, CA 94608-2411

Fax. 510-547-5043 Phone: 510-547-5420

April 1, 1993

Jeff Sharpio
Alameda County Department
of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621-1426

Re: ACDEH STID #1976
Shell Service Station
WIC #204-4380-0303
318 South Livermore Avenue
Livermore, California
WA Job #81-613-203

Dear Mr. Sharpio:

This letter describes recently completed and anticipated activities at the Shell service station referenced above (Figure 1). This status report satisfies the quarterly reporting requirements prescribed by California Administrative Code Title 23 Waters, Chapter 3, Subchapter 16, Article 5, Section 265.d. The Alameda County Department of Environmental Health (ACDEH) indicated that the site will be evaluated for case closure if no hydrocarbons or lead are detected during four quarters of ground water sampling. Although we attempted to sample the site wells in the third and fourth quarters of 1992, most of the wells were dry. Included below are descriptions and results of activities performed in the first quarter 1993 and proposed work for the second quarter 1993.

#### First Quarter 1993 Activities:

- Blaine Tech Services, Inc. (BTS) of San Jose, California measured depths to ground water and collected ground water samples from all four site wells. BTS' report describing these activities and the analytic report for the ground water samples are included as Attachment A.
- Weiss Associates (WA) compiled the ground water elevation and analytic data (Tables 1 and 2) and prepared a ground water elevation contour map (Figure 2).

ACDEH, June 19, 1992, Letter from hazardous materials specialist Scott Seery to Shell environmental engineer Dan Kirk regarding the Shell service station at 318 South Livermore Avenue, Livermore, California, 2 pp.



#### Anticipated Second Ouarter 1993 Activities:

WA will submit a report presenting the results of the second quarter 1993 ground water sampling and ground water depth measurements. The report will include tabulated chemical analytic results and a ground water elevation contour map.

#### Conclusions and Recommendations:

WA recommends continued monitoring until four consecutive quarters of ground water sampling data are collected. If at that time, no hydrocarbons are detected at concentrations above California Department of Toxic Substances Control maximum contaminant levels for drinking water, WA will recommend case closure for this site.

Please call if you have any questions.

Sincerely,
Weiss, Associates

J. Michael Asport
Technical Assistant

Joseph P. Theisen, C.E.G.

JMA/JPT:jma

J:\SHELL\QMRPTS\600\613QMFE3.WP

Attachments:

Figures

Tables

A - BTS' Ground Water Monitoring Report

cc: Dan Kirk, Shell Oil Company, P.O. Box 5278, Concord, CA 94520
Tom Callaghan, Regional Water Quality Control Board, San Francisco Bay Region, 2101
Webster Street, Oakland, CA 94612

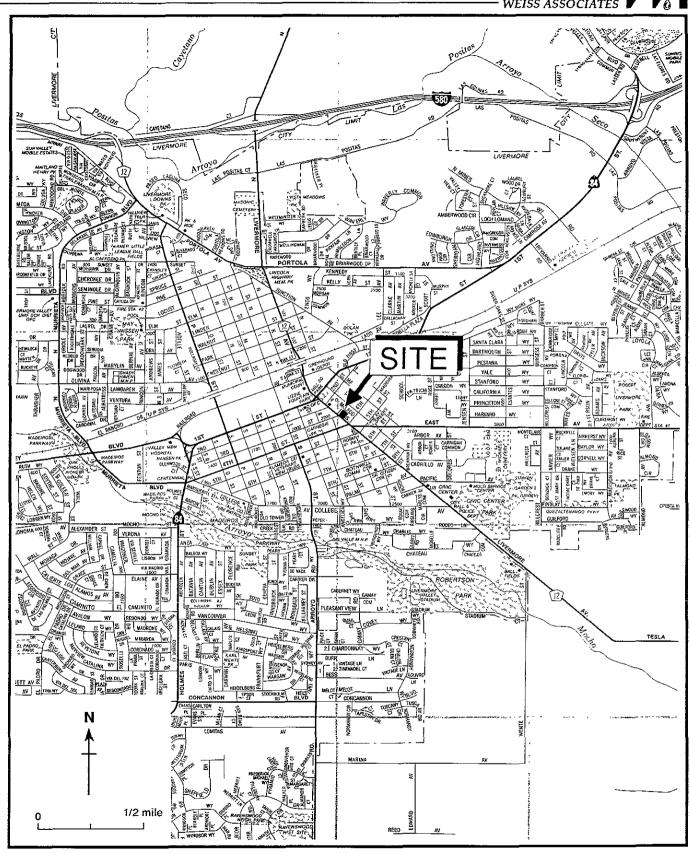


Figure 1. Site Location Map - Shell Service Station WIC #204-4380-0303, 318 South Livermore Avenue, Livermore, California

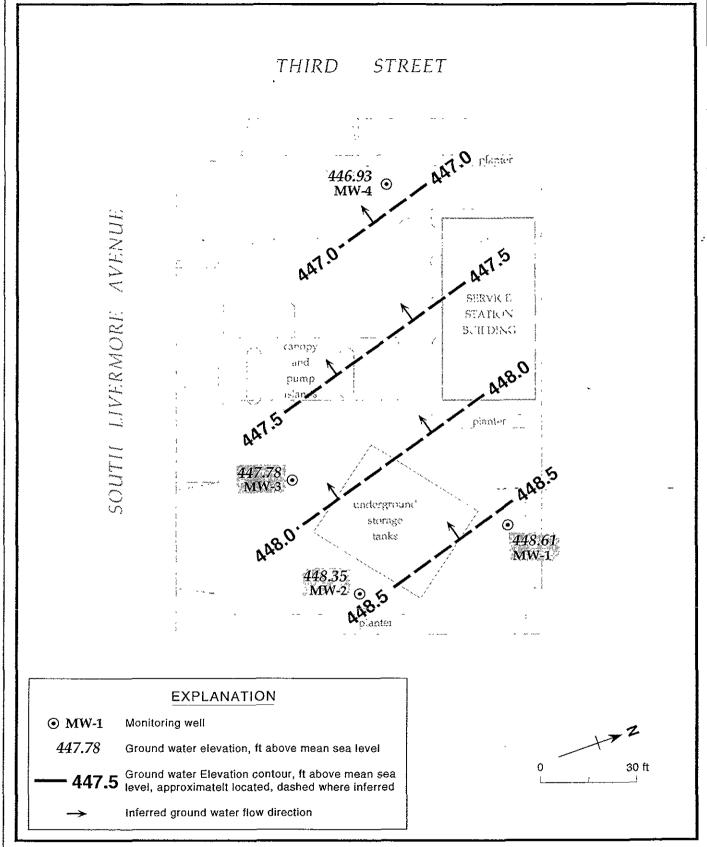


Figure 2. Monitoring Well Locations and Ground Water Elevations - January 25, 1993 - Shell Service Station WIC #204-4380-0303, 318 South Livermore Avenue, Livermore, California

Table 1. Ground Water Elevations - Shell Service Station WIC #204-4380-0303, 318 South Livermore Avenue, Livermore, California

Well ID	Date	Top-of-Casing Elevation (ft above msl)	Depth to Water (ft)	Ground Water Elevation (ft above msl)
1007.1	√ 06/21/90	406.00	42.69	453.39
MW-1		496.08	42.69 44.75	455.39 451.33
	y 09/28/90			
	11/06/90		45.61	450.47
	J 12/07/90		45.82	450.26
	09/02/92		Dry	Dry
	11/13/92		Dry	Dry
	01/25/93		47.47	448.61
MW-2	06/21/90	495.49	42.15	453.34
	09/28/90		44.18	451.31
	11/06/90		44.98	450.51
	12/07/90		45.32	450.17
	09/02/92		Dry	Dry
	11/13/92		Dry	Dry
	01/25/93		47.14	448.35
MW-3	06/21/90	494.80	42.07	452.73
1,1 ,, 2	09/28/90	131.00	44.15	450.65
	11/06/90		44.93	449.87
	12/07/90		45.56	449.24
	09/02/92		Dry	Dry
	11/13/92		Dry	Dry
	01/25/93		47.02	447.78
MW-4	06/21/90	494.33	42.21	452,12
TAE AA_4	09/28/90	474.33	44.27	450.06
			44.27 45.12	449.21
	11/06/90		45.12 45.97	449.21
	12/07/90		43.97 50.61	448.30 443.72
	09/02/92			
	11/13/92		Dry	Dry
	01/25/93		47.40	446.93

<sup>--</sup> Table 2 continues on next page --

#### Table 2. Analytic Results for Ground Water - Shell Service Station WIC #204-4380-0303, 318 South Livermore Avenue, Livermore, California (continued)

#### Abbreviations:

TPH-G = Total petroleum hydrocarbons as gasoline by Modified EPA Method 8015

B = Benzene by EPA Method 8020

E = Ethylbenzene by EPA Method 8020

T = Toluene by EPA Method 8020

X = Xylenes by EPA Method 8020

Lead = Lead by EPA Method 7421

NE = Not established

--- = Not analyzed

<n = Not detected at detection limits of n ppm

DTSC MCLs = California Department of Toxic Substances Control maximum contaminant levels for drinking water

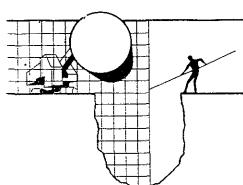
#### Notes:

a = Duplicate sample

b = DTSC recommended action level; MCL not established



# ATTACHMENT A GROUND WATER MONITORING REPORT AND ANALYTIC REPORT



# BLAINE TECH SERVICES INC.

985 TIMOTHY DRIVE SAN JOSE, CA 95133 (408) 995-5535 FAX (408) 293-8773

February 3, 1993

Shell Oil Company P.O. Box 5278 Concord, CA 94520-9998

Attn: Daniel T. Kirk

SITE: Shell WIC # 204-4380-0303 318 S. Livermore Ave. Livermore, California

QUARTER: 1st quarter of 1993

# QUARTERLY GROUNDWATER SAMPLING REPORT 930125-N-2

This report contains data collected during routine inspection, gauging and sampling of groundwater monitoring wells performed by Blaine Tech Services, Inc. in response to the request of the consultant who is overseeing work at this site on behalf of our mutual client, Shell Oil Company. Data collected in the course of our field work is presented in a TABLE OF WELL GAUGING DATA. The field information was collected during our preliminary gauging and inspection of the wells, the subsequent evacuation of each well prior to sampling, and at the time of sampling.

Measurements taken include the total depth of the well and the depth to water. The surface of the water was further inspected for the presence of immiscibles which may be present as a thin film (a sheen on the surface of the water) or as a measurable free product zone (FPZ). At intervals during the evacuation phase, the purge water was monitored with instruments that measure electrical conductivity (EC), potential hydrogen (pH), temperature (degrees Fahrenheit), and turbidity (NTU). In the interest of simplicity, fundamental information is tabulated here, while the bulk of the information is turned over directly to the consultant who is making professional interpretations and evaluations of the conditions at the site.

# TABLE OF WELL GAUGING DATA

WELL I.D.	WELL DIAMETER (inches)	DATA COLLECTION DATE	MEASUREMENTS REFERENCED TO	QUALITATIVE OBSERVATIONS (sheen)	DEPTH TO FIRST IMMISCIBLE LIQUID (FPZ) (feet)	THICKNESS OF IMMISCIBLE LIQUID ZONE (feet)	VOLUME OF IMMISCIBLES REMOVED (m1)	DEPTH TO WATER (feet)	DEPTH TO WELL BOTTOM (feet)
MW-1	4	01-25-93	TOP OF PIPE		NONE			47.47	54.45
MW-2	4	01-25-93	TOP OF PIPE		NONE			47.14	52.46
MM-3	4	01-25-93	TOP OF PIPE		NONE			47.02	51.70
MW-4 *	4	01-25-93	TOP OF PIPE		NONE			47.40	54.86
0B-1	4	01-25-93	TOP OF PIPE	DRY	NONE		60 66		12.92
ØB-2	6	01-25-93	TOP OF PIPE	DRY	NONE				13.98
OB-3	4	01-25-93	TOP OF PIPE	DRY	NONE	ar 04			12.89
OB-4	6	01-25-93	TOP OF PIPE	DRY ;	NONE		~~		11.98

<sup>\*</sup> Sample MW-5 was a duplicate sample taken from well MW-4.

#### STANDARD PROCEDURES

#### **Evacuation**

Groundwater wells are thoroughly purged before sampling to insure that the sample is collected from water that has been newly drawn into the well from the surrounding geologic formation. The selection of equipment to evacuate each well is based on the physical characteristics of the well and what is known about the performance of the formation in which the well has been installed. There are several suitable devices which can be used for evacuation. The most commonly employed devices are air or gas actuated pumps, electric submersible pumps, and hand or mechanically actuated bailers. Our personnel frequently employ USGS/Middleburg positive displacement pumps or similar air actuated pumps which do not agitate the water standing in the well.

Normal evacuation removes three case volumes of water from the well. More than three case volumes of water may be removed in cases where more evacuation is needed to achieve stabilization of water parameters. Less than three case volumes of water may be obtained in cases where the well dewaters and does not recharge to 80% of its original volume within two hours and any additional time our personnel have reason to remain at the site. In such cases, our personnel return to the site within twenty four hours and collect sample material from the water which has recharged into the well case.

#### Decontamination

All apparatus is brought to the site in clean and serviceable condition. The equipment is decontaminated after each use and before leaving the site.

#### Free Product Skimmer

The column headed, VOLUME OF IMMISCIBLES REMOVED (ml) is included in the TABLE OF WELL GAUGING DATA to cover situations where a free product skimming device must be removed from the well prior to gauging. Skimmers are installed in wells with a free product zone on the surface of the water. The skimmer is a free product recovery device which often prevents normal well gauging and free product zone measurements. The 2.0" and 3.0" PetroTraps fall into the category of devices that obstruct normal gauging. In cases where the consultant elects to have our personnel pull the skimmers out of the well and gauge the well, our personnel perform the additional task of draining the accumulated free product out of the PetroTrap before putting it back in the well. This recovered free product is measured and logged in the VOLUME OF IMMISCIBLES REMOVED column. Gauging at such site is performed in accordance with specific directions from the professional consulting firm overseeing work at the site on Shell's behalf.

Blaine Tech Services, Inc. 930125-N-2 Shell 318 S. Livermore, Livermore page 3

#### Sample Containers

Sample material is collected in specially prepared containers which are provided by the laboratory that performs the analyses.

#### Sampling

Sample material is collected in stainless steel bailer type devices normally fitted with both a top and a bottom check valve. Water is promptly decanted into new sample containers in a manner which reduces the loss of volatile constituents and follows the applicable EPA standard for handling volatile organic and semi-volatile compounds.

Following collection, samples are promptly placed in an ice chest containing prefrozen blocks of an inert ice substitute such as Blue Ice or Super Ice. The samples are maintained in either an ice chest or a refrigerator until delivered into the custody of the laboratory.

#### Sample Designations

All sample containers are identified with a site designation and a discrete sample identification number specific to that particular groundwater well. Additional standard notations (e.g. time, date, sampler) are also made on the label. Either the requested analyses or the specific analytes are written on the sample label (e.g. TPH-G, BTEX).

## **Chain of Custody**

Samples are continuously maintained in an appropriate cooled container while in our custody and until delivered to the laboratory under a standard Shell Oil Company chain of custody. If the samples are taken charge of by a different party (such as another person from our office, a courier, etc.) prior to being delivered to the laboratory, appropriate release and acceptance records are made on the chain of custody (time, date, and signature of the person releasing the samples followed by the time, date and signature of the person accepting custody of the samples).

#### Hazardous Materials Testing Laboratory

The samples obtained at this site were delivered to Anametrix, Inc. in San Jose, California. Anametrix, Inc. is a California Department of Health Services certified Hazardous Materials Testing Laboratory and is listed as DOHS HMTL #1234.

#### **Objective Information Collection**

Blaine Tech Services, Inc. performs specialized environmental sampling and documentation as an independent third party. In order to avoid compromising the objectivity necessary for the proper and disinterested performance of this work, Blaine Tech Services, Inc.

performs no consulting and does not become involved in the marketing or installation of remedial systems of any kind. Blaine Tech Services, Inc. is concerned only with the generation of objective information, not with the use of that information to support evaluations and recommendations concerning the environmental condition of the site. Even the straightforward interpretation of objective analytical data is better performed by interested regulatory agencies, and those engineers and geologists who are engaged in the work of providing professional opinions about the site and proposals to perform additional investigation or design remedial systems.

### Reportage

Submission of this report and the attached laboratory report to interested regulatory agencies is handled by the consultant in charge of the project. Any professional evaluations or recommendations will be made by the consultant under separate cover.

Please call if we can be of any further assistance.

Richard C. Blaine

RCB/kkl

attachments: chain of custody

certified analytical report

cc: Weiss Associates 5500 Shellmound Street Emeryville, CA 94608-2411 ATTN: Kristina Koltavary

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# ANAMETRIX INC

Environmental & Analytical Chemistry

#### Part of Inchcape Environmental



MR. GLEN BENNETT BLAINE TECH 985 TIMOTHY STREET

SAN JOSE, CA 95133

Workorder # : 9301276 Date Received: 01/26/93 Project ID : 204-4380-0303

Purchase Order: MOH-B813

The following samples were received at Anametrix, Inc. for analysis:

ANAMETRIX ID	CLIENT SAMPLE ID
9301276- 1	MW-1
9301276- 2	MW-2
9301276- 3	MW-3
9301276- 4	MW-4
9301276- 5	MW-5
9301276- 6	T. BLANK

This report consists of 11 pages not including the cover letter, and is organized in sections according to the specific Anametrix laboratory group or section which performed the analysis(es) and generated the data. The Report Summary that precedes each section will help you determine which Anametrix group is responsible for those test results, and will bear the signatures of the department supervisor and the chemist who have reviewed the analytical data. Please refer all questions to the department supervisor who signed the form.

Anametrix is certified by the California Department of Health Services (DHS) to perform environmental testing under Certificate Number 1234. À detailed list of the approved fields of testing can be obtained bycalling our office, or the DHS Environmental Laboratory Accreditation Program at (415)540-2800.

If you have any further questions or comments on this report, please give us a call as soon as possible. Thank you for using Anametrix.

Laboratory Director

#### REPORT SUMMARY ANAMETRIX, INC. (408)432-8192

MR. GLEN BENNETT

BLAINE TECH

985 TIMOTHY STREET SAN JOSE, CA 95133

Workorder # : 9301276
Date Received : 01/26/93
Project ID : 204-4380-0303
Purchase Order: MOH-B813
Department : GC
Sub-Department: TPH

#### SAMPLE INFORMATION:

ANAMETRIX SAMPLE ID	CLIENT SAMPLE ID	MATRIX	DATE SAMPLED	METHOD
9301276- 1	MW-1	WATER	01/26/93	TPHg/BTEX
9301276- 2	MW-2	WATER	01/26/93	TPHg/BTEX
9301276- 3	MW-3	WATER	01/26/93	TPHg/BTEX
9301276- 4	MW-4	WATER	01/26/93	TPHg/BTEX
9301276- 5	MW-5	WATER	01/26/93	TPHg/BTEX
9301276- 6	T. BLANK	WATER	01/26/93	TPHg/BTEX

#### REPORT SUMMARY ANAMETRIX, INC. (408)432-8192

MR. GLEN BENNETT

BLAINE TECH

985 TIMOTHY STREET SAN JOSE, CA 95133 Workorder # : 9301276
Date Received : 01/26/93
Project ID : 204-4380-0303

Purchase Order: MOH-B813

Department : GC Sub-Department: TPH

### QA/QC SUMMARY :

- No QA/QC problems encountered for these samples.

<u>luca</u> Sur 2/5/93 Chemist

GC/TPH - PAGE 2

# ANALYSIS DATA SHEET - TOTAL PETROLEUM HYDROCARBONS (GASOLINE WITH BTEX) ANAMETRIX, INC. - (408) 432-8192

Anametrix W.O.: 9301276 Project Number: 204-4380-0303

Matrix : WATER Date Released : 02/03/93

Date Sampled: 01/26/93

	Reporting Limit	Sample I.D.# MW-1	Sample I.D.# MW-2	Sample I.D.# MW-3	Sample I.D.# MW-4	Sample I.D.# MW-5
COMPOUNDS	(ug/L)	-01	-02 		-04 	-05 
Benzene Toluene Ethylbenzene Total Xylenes TPH as Gasoline % Surrogate Rec	0.5 0.5 0.5 0.5 50	ND ND ND ND ND	ND ND ND ND ND	ND ND ND ND ND	ND ND ND ND ND	ND ND ND ND ND
Instrument I. Date Analyzed RLMF		HP21 01/30/93 1	HP21 01/29/93 1	HP21 01/29/93 1	HP21 01/29/93 1	HP21 01/29/93 1

ND - Not detected at or above the practical quantitation limit for the method.

Anametrix control limits for surrogate p-Bromofluorobenzene recovery are 53-147%.

All testing procedures follow California Department of Health Services (Cal-DHS) approved methods.

Luna Shor 2/5/93 Analyst Date Cheul Balmer 2/5-/23 Supervisor Date

TPHg - Total Petroleum Hydrocarbons as gasoline is determined by GCFID using modified EPA Method 8015 following sample purge and trap by EPA Method 5030.

BTEX - Benzene, Toluene, Ethylbenzene, and Total Xylenes are determined by modified EPA Method 8020 following sample purge and trap by EPA Method 5030.

RLMF - Reporting Limit Multiplication Factor.

#### ANALYSIS DATA SHEET - TOTAL PETROLEUM HYDROCARBONS (GASOLINE WITH BTEX) ANAMETRIX, INC. - (408) 432-8192

Anametrix W.O.: 9301276 Project Number : 204-4380-0303

Matrix : WATER Date Released : 02/03/93

Date Sampled: 01/26/93

	Reporting Limit		Sample I.D.# BJ2901E3		
COMPOUNDS	(ug/L)	-06 	BLANK	BLANK	 
Benzene Toluene Ethylbenzene Total Xylenes TPH as Gasoline  * Surrogate Rece Instrument I.1 Date Analyzed RLMF	D	ND ND ND ND ND 103% HP21 01/29/93	ND ND ND ND ND 102% HP21 01/29/93	ND ND ND ND ND 100% HP21 01/30/93	

ND - Not detected at or above the practical quantitation limit for the method.

TPHq - Total Petroleum Hydrocarbons as gasoline is determined by GCFID. using modified EPA Method 8015 following sample purge and trap by EPA Method 5030.

BTEX - Benzene, Toluene, Ethylbenzene, and Total Xylenes are determined by modified EPA Method 8020 following sample purge and trap by EPA Method 5030.

RLMF - Reporting Limit Multiplication Factor.

Anametrix control limits for surrogate p-Bromofluorobenzene recovery are 53-147%.

All testing procedures follow California Department of Health Services (Cal-DHS) approved methods.

Icer Shor 2/5/93 Date

#### TOTAL VOLATILE HYDROCARBON MATRIX SPIKE REPORT EPA METHOD 5030 WITH GC/FID ANAMETRIX, INC. (408) 432-8192

Sample I.D. : 204-4380-0303 MW-2 Anametrix I.D.: 9301276-02

Analyst : IS
Supervisor : US
Date Released : 02/03/93
Instrument I.D.: HP21 : WATER Matrix

Date Sampled : 01/26/93 Date Analyzed : 01/29/93

COMPOUND	SPIKE AMT (ug/L)	SAMPLE CONC (ug/L)	MS AMT (ug/L)	% REC MS	MD (ug/L)	% REC MD	RPD	% REC LIMITS
BENZENE TOLUENE ETHYLBENZENE TOTAL-XYLENES	10.0 10.0 10.0 10.0	0.0 0.0 0.0 0.0	8.3 9.3 9.6 9.1	83% 93% 96% 91%	11.6 12.4 13.1 12.2	116% 124% 131% 122%	33% 29% 31% 29%	49-159 53-156 54-151 56-157
p-BFB				81%		76%		53-147

<sup>\*</sup> Quality control limit established by Anametrix, Inc.

# BTEX LABORATORY CONTROL SAMPLE REPORT EPA METHOD 5030 WITH GC/PID ANAMETRIX, INC. (408) 432-8192

Sample I.D. : LAB CONTROL SAMPLE Anametrix I.D.: LCSW0129

Analyst : IS
Supervisor : B
Date Released : 02/03/93
Instrument ID : HP21 Matrix : WATER

Date Sampled : N/A
Date Analyzed : 01/29/93

COMPOUND	SPIKE AMT. (ug/L)	LCS (ug/L)	REC LCS	%REC LIMITS
Benzene Toluene Ethylbenzene TOTAL Xylenes	10.0 10.0 10.0 10.0	11.5 12.5 13.3 12.3	115% 125% 133% 123%	49-159 53-156 54-151 56-157
P-BFB			76%	53-147

<sup>\*</sup> Limits established by Anametrix, Inc.

#### REPORT SUMMARY ANAMETRIX, INC. (408)432-8192

MR. GLEN BENNETT

BLAINE TECH

985 TIMOTHY STREET SAN JOSE, CA 95133 Workorder # : 9301276

Date Received: 01/26/93
Project ID: 204-4380-0303
Purchase Order: MOH-B813

Department : METALS Sub-Department: METALS

#### SAMPLE INFORMATION:

ANAMETRIX SAMPLE ID	CLIENT SAMPLE ID	MATRIX	DATE SAMPLED	METHOD
9301276- 1	MW-1	WATER	01/26/93	7421
9301276- 2	MW-2	WATER	01/26/93	7421
9301276- 3	MW-3	WATER	01/26/93	7421
9301276- 4	MW-4	WATER	01/26/93	7421
9301276- 5	MW5	WATER	01/26/93	7421

#### REPORT SUMMARY ANAMETRIX, INC. (408)432-8192

MR. GLEN BENNETT

BLAINE TECH

985 TIMOTHY STREET

SAN JOSE, CA 95133

Workorder # : 9301276
Date Received : 01/26/93
Project ID : 204-4380-0303
Purchase Order: MOH-B813

Department : METALS

Sub-Department: METALS

#### QA/QC SUMMARY :

- No QA/QC problems encountered for samples.

Wanyhguyn Department Supervisor

Mang Kamel 2/2/93 Chemist

#### INORGANIC ANALYSIS DATA SHEET ANAMETRIX, INC. (408) 432-8192

Analyte-Method: LEAD-7421

Project I.D. : 204-4380-0303 Matrix : WATER

Reporting Unit: ug/L

· MK, Analyst : MK Supervisor : MK Instrument I.D. : AA2 Date Sampled : 01/26/93

ANAMETRIX SAMPLE I.D.	CLIENT I.D.	DATE PREPARED	DATE ANALYZED	REP.	DIL. FACTOR	RESULT	Q
9301276-01 9301276-02 9301276-03 9301276-04 9301276-05 MB0127W	MW-1 MW-2 MW-3 MW-4 MW-5 METHOD BLANK	01/27/93 01/27/93 01/27/93 01/27/93 01/27/93 01/27/93	01/30/93 01/30/93 01/30/93 01/30/93 01/30/93	3.0 3.0 3.0 3.0 3.0 3.0	1 1 1 1 1	ND ND ND ND ND ND	

COMMENT:

# LABORATORY CONTROL SAMPLE REPORT ANAMETRIX, INC. (408) 432-8192

: 204-4380-0303

Spike I.D. : LCS0127W
Project I.D. : 204-4380-Matrix

Analyst : MK Supervisor : MW

: WATER

Instrument I.D : AA3

Reporting	Unit	:	ug/L
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	DATE	DATE	SPIKE	METHOD	%	
ANALYTE-METHOD	PREPARED	ANALYZED	AMT.	SPIKE	REC.	Q
LEAD-7421	01/27/93	01/30/93	20.0	19.2	96.0	

COMMENT:

### MATRIX SPIKE REPORT ANAMETRIX, INC. (408) 432-8192

Spike I.D. : 9301276-05MS,MD
Client ID : MW-5

Date Prepared : 01/27/93

Project I.D. : 204-4380-0303

Date Analyzed : 01/30/93
Analyst : MK
Supervisor : MW

: WATER Matrix

Reporting Unit: ug/L

Instrument I.D.: AA3

SPIKE	SAMPLE	M.S.	8	M.S.D.	%		
AMOUNT	CONC.	CONC.	REC.	CONC.	REC.	RPD	Q
20.0	0.0	18.7	93.5	19.3	96.5	3.2	
	AMOUNT	AMOUNT CONC.	AMOUNT CONC. CONC.	AMOUNT CONC. CONC. REC.	AMOUNT CONC. CONC. REC. CONC.	AMOUNT CONC. CONC. REC. CONC. REC.	AMOUNT CONC. CONC. REC. CONC. REC. RPD

COMMENT: