

March 5, 1992  
30-718-9E, MV030503

**AM HOMES**  
577 Salmar Avenue  
Campbell, California 95008

921111-0 00 9:10

**RE: ANALYTICAL RESULTS,  
32-ACRE HAYWARD PARCEL,  
HAYWARD, CALIFORNIA**

Attention: Mr. Steve Delva

Gentlemen:

As you know, we have recently completed a report for the referenced site dated February 10, 1992. The purpose of this letter is to amend analytical results of slag and soil samples which were initially analyzed for metals by inductively coupled plasma (ICP) techniques.

As discussed in our report, elevated levels of arsenic, mercury, and selenium were detected in various samples analyzed by ICP. Since our discussions with several analytical laboratories indicated that ICP methods can produce inaccurate results for these select metals due to various matrix affects, we initially reanalyzed one slag sample for arsenic and selenium and two soil samples for mercury using atomic absorption spectrometry (AA). These results, as presented in our report, showed a significant decrease in concentrations.

Atomic absorption is the preferred analytical method for these metals and more accurately represent metal concentrations in soil and slag at the site, in our opinion. Therefore, the majority of samples initially analyzed by ICP were reanalyzed for arsenic, mercury, and selenium using AA (EPA test methods 7060, 7470, and 7740, respectively). These results are presented below and on the attached laboratory data sheets. Results originally obtained using ICP methods are included for comparison.

**SLAG ANALYSES**

As shown below in Tables 1 and 2, laboratory analyses of slag samples using AA did not detect total or soluble mercury or selenium. In addition, arsenic concentrations were generally much lower than those previously detected using ICP techniques.

TABLE 1. Analytical Results of Slag Samples  
for Total (TTLC) Arsenic, Mercury, and Selenium  
32-Acre Hayward Parcel, Hayward, California  
(Concentrations in ppm)

Metal	Slag Type A	Slag Type B	Slag Type C	Slag Type D	Slag Type E	Slag Type F	TTLC Limit
Arsenic (ICP)	59.3	<0.06	56.3	59.0	35.9	47.4	500
Arsenic (AA)	1.45	6.20	4.51	2.39	0.44	2.81	
Mercury (ICP)	13.5	<0.024	11.9	12.9	1.9	10.3	20
Mercury (AA)	<0.024	<0.024	<0.024	<0.024	<0.024	<0.024	
Selenium (ICP)	39.3	<0.06	33.6	33.6	19.8	29.8	100
Selenium (AA)	<0.06	<0.06	<0.06	<0.06	<0.06	<0.06	

TABLE 2. Analytical Results of Slag Samples  
for Soluble (STLC) Arsenic, Mercury, and Selenium†  
32-Acre Hayward Parcel, Hayward, California  
 (Concentrations in ppm)

<u>Metal</u>	pH 7.0 Slag <u>Type A</u>	pH 9.0 Slag <u>Type A</u>	pH 1.5 Slag <u>Type A</u>	pH 7.0 Slag <u>Type B</u>	pH 9.0 Slag <u>Type B</u>	pH 1.5 Slag <u>Type B</u>	<u>STLC Limit</u>
Arsenic (ICP)	<0.030	0.27	2.2	NA	NA	NA	5.0
Arsenic (AA)	NA	<0.06	<0.06	<0.06	0.078	<0.06	
Mercury (ICP)	<0.010	0.13	0.52	NA	NA	NA	0.2
Mercury (AA)	<0.024	<0.024	<0.024	<0.024	<0.024	<0.024	
Selenium (ICP)	<0.150	0.16	1.2	NA	NA	NA	1.0
Selenium (AA)	NA	<0.06	<0.06	<0.06	<0.06	<0.06	
<u>Metal</u>	pH 7.0 Slag <u>Type C</u>	pH 9.0 Slag <u>Type C</u>	pH 1.5 Slag <u>Type C</u>	pH 7.0 Slag <u>Type D</u>	pH 9.0 Slag <u>Type D</u>	pH 1.5 Slag <u>Type D</u>	<u>STLC Limit</u>
Arsenic (ICP)	<0.030	0.13	2.80	<0.030	0.05	3.65	5.0
Arsenic (AA)	<0.06	0.082	0.071	<0.06	<0.06	NA	
Mercury (ICP)	<0.010	<0.010	0.71	<0.010	<0.010	0.96	0.2
Mercury (AA)	<0.024	<0.024	<0.024	<0.024	<0.024	NA	
Selenium (ICP)	<0.150	<0.150	1.64	<0.150	<0.150	2.30	1.0
Selenium (AA)	<0.06	<0.06	<0.06	<0.06	<0.06	NA	
<u>Metal</u>	pH 7.0 Slag <u>Type E</u>	pH 9.0 Slag <u>Type E</u>	pH 1.5 Slag <u>Type E</u>	pH 7.0 Slag <u>Type F</u>	pH 9.0 Slag <u>Type F</u>	pH 1.5 Slag <u>Type F</u>	<u>STLC Limit</u>
Arsenic (ICP)	<0.030	<0.030	1.7	<0.030	0.51	<0.030	5.0
Arsenic (AA)	<0.06	<0.06	NA	<0.06	<0.06	<0.06	
Mercury (ICP)	<0.010	<0.010	0.69	<0.010	0.21	0.41	0.2
Mercury (AA)	<0.024	<0.024	NA	<0.024	<0.024	<0.024	
Selenium (ICP)	<0.150	<0.150	1.19	<0.150	0.47	1.13	1.0
Selenium (AA)	<0.06	<0.06	NA	<0.06	<0.06	<0.06	

† Samples were analyzed by modified STLC extraction techniques using extraction solutions with pH values of 7.0, 9.0, and 1.5 to simulate neutral conditions, actual on-site conditions, and conditions within the human digestive system, respectively.

**SOIL ANALYSES**

As shown in Tables 3 and 4 below, laboratory analyses of composite soil samples collected from backhoe pits detected low levels of total arsenic and selenium. Total mercury was not detected. In addition, no soluble concentrations of these metals were detected.

**TABLE 3. Laboratory Analysis of Composite Soil Samples From Backhoe Pits for Total (TTLC) Arsenic, Mercury, and Selenium.**  
32-Acre Hayward Parcel, Hayward, California  
 (concentrations in ppm)

Sample	Depth (ft.)	Arsenic		Mercury		Selenium	
		ICP	AA	ICP	AA	ICP	AA
P-1	2.5	NA	0.54	11.1	<0.024	25.0	0.20
P-2	2.5	NA	0.49	17.7	<0.024	39.8	0.23
P-3	2.0	NA	2.05	19.2	<0.024	37.3	0.90
P-4	2.0	NA	1.70	20.3	<0.024	37.8	<0.06
P-5	2.5	NA	4.97	14.1	<0.024	34.4	<0.06
P-6	3.0	NA	3.94	18.2	<0.024	41.6	<0.06
P-7	1.5	NA	<0.06	10.3	<0.024	25.0	0.09
P-8	3.0	NA	4.07	12.9	<0.024	34.4	<0.06
P-9	2.0	NA	0.29	14.1	<0.024	34.7	0.29
P-10	2.0	NA	<0.06	12.4	<0.024	32.1	<0.06
P-11	1.5	NA	0.33	8.63	<0.024	28.8	<0.06
P-12	1.5	NA	<0.06	10.8	<0.024	26.7	<0.06
TTLC Limit		500		20		100	

**TABLE 4. Laboratory Analysis of Composite Soil Samples From Backhoe Pits for Soluble (STLC) Arsenic, Mercury, and Selenium†.**  
32-Acre Hayward Parcel, Hayward, California  
 (concentrations in ppm)

Sample	Depth (ft.)	pH	Arsenic		Mercury		Selenium	
			ICP	AA	ICP	AA	ICP	AA
P-1	2.5	6.83	NA	<0.06	0.19	<0.024	0.19	<0.06
P-2	2.5	7.07	NA	<0.06	0.25	<0.024	0.36	<0.06
P-3	2.0	6.82	NA	NA	0.26	<0.024	0.30	NA
P-4	2.0	7.19	NA	<0.06	0.15	<0.024	0.20	<0.06
P-5	2.5	6.96	NA	<0.06	0.11	<0.024	<0.15	<0.06
P-6	3.0	8.34	NA	<0.06	0.13	<0.024	<0.15	<0.06
P-7	1.5	7.45	NA	<0.06	0.16	<0.024	0.21	<0.06
P-8	3.0	9.13	NA	<0.06	0.17	<0.024	<0.15	<0.06
P-9	2.0	9.01	NA	<0.06	0.13	<0.024	0.21	<0.06
P-10	2.0	8.57	NA	<0.06	0.15	<0.024	0.23	<0.06
P-11	1.5	8.83	NA	<0.06	0.11	<0.024	0.17	<0.06
P-12	1.5	3.75	NA	<0.06	0.22	<0.024	0.47	<0.06
STLC Limit			5.0		0.20		1.0	

† To simulate on-site conditions, samples were analyzed by modified STLC extraction techniques using extraction solutions with pH values similar to the actual pH of each composite sample

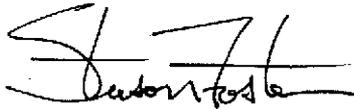
**CONCLUSIONS**

Metal concentrations detected by AA were well below regulatory limits and significantly lower than concentrations previously detected using ICP techniques. Mercury was not detected in slag or soil samples above laboratory detection limits. Arsenic and selenium were detected at only very low levels which, in our opinion, represent naturally occurring background concentrations. In our opinion, the metal concentrations detected do not present a threat to human health or the environment.

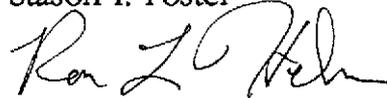
If you have any questions concerning our findings, please call.

Very truly yours,

**LOWNEY ASSOCIATES**



Stason I. Foster



Ron L. Helm



Glenn A. Romig, P.E.



Copies: Addressee (1)  
Attn: Mr. Steve Delva  
CH2M Hill  
Attn: Ms. Madeline Wall  
ICF Kaiser Engineers  
Attn: Mr. Ray Plock  
Pepsi Cola Company  
Attn: Mr. Paul Morici  
Hayward Fire Department  
Attn: Mr. Hugh Murphy  
Alameda County Health Department  
Attn: Mr. Ravi Arulanantham

Attachments: Laboratory results

SIF

## ENVIRONMENTAL ANALYSIS REPORT

CARTER ANALYTICAL LABORATORY, INC.

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590 DIVISION STREET • CAMPBELL, CA 95008 • (408) 364-3030 • FAX (408) 866-0319

ANALYSIS REPORT  
FOR

Lowney Associates  
405 Clyde Avenue  
Mountain View, CA 94043

CONTACT: Stason Foster

DATE: 02-25-92

CHAIN OF CUSTODY ID NO: 718-9E

ORDER NO: 12261-JN P.O. NO: 718-9E

SITE DESCRIPTION: Two Hayward Parcels

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SAMPLE DESCRIPTION:

Extracts  
Sampled: 12-06-91  
Received: 12-09-91  
Analyzed: 02-22-92  
Number of Samples: 6

REQUESTED ANALYSIS:

Methods: EPA 7060, EPA 7470, EPA 7740

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The analyses reported are considered accurate. Should you wish further support for the reported data, submit your requirements in writing within 10 days. It is Carter Analytical Labs intent to give you complete satisfaction. Please reference the order number when communicating with us. The invoice is due and payable within 30 days from invoice date.

Hazardous Materials Certification No: 304 • Drinking Water Certification No: 953  
from the  
State of California • Department of Health Services

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CARTER ANALYTICAL LABORATORY, INC.

590 DIVISION STREET • CAMPBELL, CA 95008 • (408) 364-3030 • FAX (408) 866-0319

<u>Sample</u>	<u>Customer Label</u>	<u>Description</u>
L1	A (Extract)	slag
L2	B (Extract)	slag
L3	C (Extract)	slag
L4	D (Extract)	slag
L5	E (Extract)	slag
L6	F (Extract)	slag

Metals Analysis

<u>Metal</u>	<u>EPA Method</u>	<u>L1* (mg/Kg)</u>	<u>L2* (mg/Kg)</u>	<u>L3* (mg/Kg)</u>	<u>L4* (mg/Kg)</u>	<u>Detection Limit (mg/Kg)</u>
Arsenic	7060	1.45	6.20	4.51	2.39	.06
Mercury	7470	LDL	LDL	LDL	LDL	.024
Selenium	7740	LDL	LDL	LDL	LDL	.06

<u>Metal</u>	<u>EPA Method</u>	<u>L5* (mg/Kg)</u>	<u>L6* (mg/Kg)</u>	<u>Detection Limit (mg/Kg)</u>
Arsenic	7060	0.44	2.81	.06
Mercury	7470	LDL	LDL	.024
Selenium	7740	LDL	LDL	.06

LDL indicates results were less than detection limit.

\* = Extracts

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CARTER ANALYTICAL LABORATORY

*A. E. Robinson*  
 Dr. A. Edward Robinson  
 Laboratory Manager

*J. D. Carter*  
 J. D. Carter  
 QA/QC Manager

# LOWNEY ASSOCIATES CHAIN OF CUSTODY RECORD

SO# 11999-41-412

JOB NO. 718-9E		PROJECT NAME/LOCATION TWO HAYWARD PARCELS			NO. OF CONTAINERS	ANALYSIS REQUIRED							SHIP TO:		
SAMPLER(S): (Signature) <i>John Foster</i>						17 CAN METALS (P/P)							LOWNEY ASSOCIATES 405 Clyde Avenue Mountain View, CA 94043 415-967-2365 415-967-2785 (FAX)		
DATE	TIME	SAMPLE DESCRIPTION											REMARKS		
12/6/91		A	slag		2	X							2-DAY TURNAROUND		
34		B			2	X							(SAVE ALL UNUSED PORTIONS FOR POSSIBLE FUTURE ANALYSES)		
56		C			2	X									
78		D			2	X									
910		E			2	X									
11-12		F			2	X									
Relinquished by: (Signature) <i>John Foster</i>		Date 12/9/91	Time	Received By: (Signature) <i>[Signature]</i>		Date 12/9/91	Time	Relinquished by: (Signature) <i>Dan Turgeon</i>		Date 12/9/91	Time 5:00	Received By: (Signature) <i>Deborah Richmond</i>			
Laboratory of Record: CARTER LABS		Date 12/11	Time 3:45	Received for Laboratory By: (Signature) <i>[Signature]</i>		Date 12/11	Time 3:45	Remarks: samples rec'd. cold / good condition							

Relinquished by: *Deborah Richmond* 12/12 12:45  
 Received by: *Deborah Richmond* 12/13 12:45

# ENVIRONMENTAL ANALYSIS REPORT

CARTER ANALYTICAL LABORATORY, INC.

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590 DIVISION STREET • CAMPBELL, CA 95008 • (408) 364-3030 • FAX (408) 866-0319

ANALYSIS REPORT  
FOR

Lowney Associates  
405 Clyde Avenue  
Campbell, CA 95008

CONTACT: Stason Foster

DATE: 02-25-92

CHAIN OF CUSTODY ID NO: 718-9E

ORDER NO: 12262-JN P.O. NO: 718-9E

SITE DESCRIPTION: Two Hayward Parcels

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SAMPLE DESCRIPTION:

Extracts  
Sampled: 12-19-91  
Received: 12-19-91  
Analyzed: 02-18-92  
Number of Samples: 6

REQUESTED ANALYSIS:

Methods: EPA 7470, EPA 7740, EPA 7060

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The analyses reported are considered accurate. Should you wish further support for the reported data, submit your requirements in writing within 10 days. It is Carter Analytical Labs intent to give you complete satisfaction. Please reference the order number when communicating with us. The invoice is due and payable within 30 days from invoice date.

Hazardous Materials Certification No: 304 • Drinking Water Certification No: 953  
from the  
State of California • Department of Health Services

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CARTER ANALYTICAL LABORATORY, INC.

590 DIVISION STREET • CAMPBELL, CA 95008 • (408) 364-3030 • FAX (408) 866-0319

<u>Sample</u>	<u>Customer Label</u>	<u>Description</u>
L1	A	slag
L2	B	slag
L3	C	slag
L4	D	slag
L5	E	slag
L6	F	slag

Metals Analysis

		7470 Mercury (mg/L)	7740 Selenium (mg/L)	7060 Arsenic (mg/L)
L1	pH 1.5	LDL	LDL	LDL
	H <sub>2</sub> O	LDL	<del>LDL</del> NT	<del>LDL</del> NT
	pH 9.	LDL	LDL	LDL
L2	pH 1.5	LDL	LDL	LDL
	H <sub>2</sub> O	LDL	LDL	LDL
	pH 9.	LDL	LDL	0.078
L3	pH 1.5	LDL	LDL	0.071
	H <sub>2</sub> O	LDL	LDL	LDL
	pH 9.	LDL	LDL	0.082
L4	pH 1.5	<del>LDL</del> NT	<del>LDL</del> NT	<del>LDL</del> NT
	H <sub>2</sub> O	LDL	LDL	LDL
	pH 9.	LDL	LDL	LDL
L5	pH 1.5	<del>LDL</del> NT	<del>LDL</del> NT	<del>LDL</del> NT
	H <sub>2</sub> O	LDL	LDL	LDL
	pH 9.	LDL	LDL	LDL
L6	pH 1.5	LDL	LDL	LDL
	H <sub>2</sub> O	LDL	LDL	LDL
	pH 9.	LDL	LDL	LDL
DL:		.024	.06	.06

NT = NOT TESTED

LDL means results were less than detection limits.

DL = Detection limit

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CARTER ANALYTICAL LABORATORY

*A. E. Robinson*

Dr. A. Edward Robinson  
 Laboratory Manager

*J. L. Carter*  
 QAGC Manager

# LOWNEY ASSOCIATES CHAIN OF CUSTODY RECORD

SO# 12032-41-212

JOB NO.		PROJECT NAME/LOCATION		NO. OF CONTAINERS	ANALYSIS REQUIRED						SHIP TO:	
718-9E		TWO HAYWARD PARCELS			17 METALS - STEEL - Cd, Pb, Cr, Cu, Fe, Mn, Ni, P, S, Zn	17 METALS - STEEL - DI	17 METALS - STEEL - PH 1.5	Capillary STEEL - Mn, P, S, Zn	RESISTANCE TO CORROSION	PH OF DI WATER	ANION - F, Cl, NO <sub>2</sub> , NO <sub>3</sub>	LOWNEY ASSOCIATES 405 Clyde Avenue Mountain View, CA 94013 415-967-2365 415-967-2785 (FAX)
SAMPLER(S): (Signature)		DATE		TIME	SAMPLE DESCRIPTION		REMARKS					
		12-6-91			A 3/AJ		5-DAY RESPONSE TIME					
					B							
					C							
					D							
					E							
					F							

Relinquished by: (Signature)	Date	Time	Received By: (Signature)	Relinquished by: (Signature)	Date	Time	Received By: (Signature)
FAXED	12-13-91	3:45p	Leborah Richmond	Leborah Richmond	12/19/91	4:30	Linda Rubins
Laboratory of Record:	Date	Time	Received for Laboratory By: (Signature)	Date	Time	Remarks:	
CARTER			Leborah Richmond	12/27	12:00	SEE ATTACHED FAX COVER SHEET	

Relinq: dr/Linda Rubins 12/27/91 @ 12:00

DEC-13-91 10:32 AM JY LOWNEY ASSOCIATES TEL NO: 415-967-2365 FAX NO: 415-967-2785

## ENVIRONMENTAL ANALYSIS REPORT

CARTER ANALYTICAL LABORATORY, INC.

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590 DIVISION STREET • CAMPBELL, CA 95008 • (408) 364-3030 • FAX (408) 866-0319

ANALYSIS REPORT  
FOR

Lowney Associates  
405 Clyde Avenue  
Campbell, CA 95008

CONTACT: Stason Foster

DATE: 02-25-92

CHAIN OF CUSTODY ID NO: 718-9E

ORDER NO: 12263-JN P.O. NO: 718-9E

SITE DESCRIPTION: Two Hayward Parcels

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SAMPLE DESCRIPTION:

Extracts  
Sampled: 12-26-91  
Received: 12-27-91  
Analyzed: 02-22-92  
Number of Samples: 12

REQUESTED ANALYSIS:

Methods: EPA 7470, EPA 7740, EPA 7060

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The analyses reported are considered accurate. Should you wish further support for the reported data, submit your requirements in writing within 10 days. It is Carter Analytical Labs intent to give you complete satisfaction. Please reference the order number when communicating with us. The invoice is due and payable within 30 days from invoice date.

Hazardous Materials Certification No: 304 • Drinking Water Certification No: 953  
from the  
State of California • Department of Health Services

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CARTER ANALYTICAL LABORATORY, INC.

590 DIVISION STREET • CAMPBELL, CA 95008 • (408) 364-3030 • FAX (408) 866-0319

<u>Sample</u>	<u>Customer Label</u>	<u>Description</u>
L1	P-1 2.5'	soil
L2	P-2 2.5'	soil
L3	P-3 2.0'	soil
L4	P-4 2.0	soil
L5	P-5 2.5'	soil
L6	P-6 3.0	soil
L7	P-7 1.5'	soil
L8	P-8 3.0'	soil
L9	P-9 2.0	soil
L10	P-10 2.0'	soil
L11	P-11 1.5'	soil
L12	P-12 1.5'	soil

Sample Preparation

The sample was prepared according to Title 22, Section 66700 STLC and/or TTLC procedures.

<u>Sample</u>	<u>Mercury</u> 7470 <u>(mg/L)</u>	<u>Selenium</u> 7740 <u>(mg/L)</u>	<u>Arsenic</u> 7060 <u>(mg/L)</u>
L1 TTLC	LDL	0.20	0.54
L1 STLC	LDL	LDL	LDL
L2 TTLC	LDL	0.23	0.49
L2 STLC	LDL	LDL	LDL
L3 TTLC	LDL	0.9	2.05
L3 STLC	LDL	<del>LDL</del> NT*	<del>LDL</del> NT
L4 TTLC	LDL	LDL	1.70
L4 STLC	LDL	LDL	LDL
L5 TTLC	LDL	LDL	4.97
L5 STLC	LDL	LDL	LDL
L6 TTLC	LDL	LDL	3.94
L6 STLC	LDL	LDL	LDL
L7 TTLC	LDL	0.09	LDL
L7 STLC	LDL	LDL	LDL
L8 TTLC	LDL	LDL	4.07
L8 STLC	LDL	LDL	LDL

\* NT Not TESTED

<u>Sample</u>	<u>Customer Label</u>	<u>Description</u>
L1	P-1 2.5'	soil
L2	P-2 2.5'	soil
L3	P-3 2.0'	soil
L4	P-4 2.0	soil
L5	P-5 2.5'	soil
L6	P-6 3.0	soil
L7	P-7 1.5'	soil
L8	P-8 3.0'	soil
L9	P-9 2.0	soil
L10	P-10 2.0'	soil
L11	P-11 1.5'	soil
L12	P-12 1.5'	soil

<u>Sample</u>	<u>Mercury</u> 7470 <u>(mg/L)</u>	<u>Selenium</u> 7740 <u>(mg/L)</u>	<u>Arsenic</u> 7060 <u>(mg/L)</u>
L9 TTLC	LDL	0.29	0.29
STLC	LDL	LDL	LDL
L10 TTLC	LDL	LDL	LDL
STLC	LDL	LDL	LDL
L11 TTLC	LDL	LDL	0.33
STLC	LDL	LDL	LDL
L12 TTLC	LDL	LDL	LDL
STLC	LDL	LDL	LDL
Detection Limit:	0.024	0.06	0.06
STLC Regulatory Level:	0.2	1.0	5.0
TTLC Regulatory Level:	20.	100.	500.

LDL means results were less than detection limits.

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CARTER ANALYTICAL LABORATORY



Dr. A. Edward Robinson  
 Laboratory Manager



J.L. Carter  
 QAC Manager

