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Minut

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25<sup>th</sup> January 2013

Wagga Wagga City Council c/- Coffey Projects Level 10, BT Tower 1 Market Street Sydney NSW 2000

Attn: Andy Findlay Email: <u>Andy Findlay@coffey.com.au</u>

# Re: Tarcutta Street Former Gasworks Remediation Project – WTP Discharge Response to Agencies Comments

Dear Andy,

EnviroPacific Services Pty Ltd (EPS) has been engaged by Wagga Wagga City Council (WWCC) to undertake the remediation for the former gasworks site located at the corner of Cross Street and Tarcutta Street, Wagga Wagga (the Site). As part of the remediation, EPS is proposing to amend the Part 3A Approval (10\_0040).

The proposed modifications were dated  $4^{th}$  December 2012 (rev 3 ) and  $21^{st}$  December 2012 (Rev 4).

This letter is in response to comments made by agencies received by EPS on the 10<sup>th</sup> January 2013 and 17<sup>th</sup> December 2012, regarding the Part 3A Approval 10\_0040 Amendment, and accompanies the Part 3A Approval 10\_0040 Amendment (rev 5) (attached).

The letter details the modifications made to the water treatment plant in order to meet the revised discharge criteria along with additional bench scale test results verifying the revised criteria can be achieved.

We have also undertaken detailed review of historical groundwater results for the site in order to better understand the concentrations that are likely to be encountered during the bulk excavation works.

The comments from agencies and EPS's response are detailed in the attached table. These responses have been incorporated into the Part 3A Approval 10\_0040 Amendment (EPS 21/12/12).



Newcastle Sydney

Melbourne

ne Brisbane

Adelaide

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Perth

We summarise the modification to water treatment plant as follows and provide further detail in the body of this letter:

- Additional bench scale trials were undertaken in January 2013. As a result of these trials EPS has incorporated an additional treatment step (Stage 3 Zeolite Filtration) to achieve the required discharge concentrations.
- As a contingency, EPS has sourced a Reverse Osmosis (RO) unit. The RO unit can be mobilised to site and commissioned within 5 days. In the event that elevated levels of ammonia and conductivity concentrations are encountered the RO unit will be mobilised to site and added to the water treatment plant after the stage 3 zeolite in order to achieve the required discharge concentrations

## **Review of Historical Data**

Due to the highly variable groundwater results obtained for the bench scale trails, EPS has undertaken a detailed review of Historical groundwater data for the Site, specifically for Ammonia and Conductivity. The following reports were review during this process:

- Source Location at the former Tarcutta Street Gasworks, Wagga Wagga NSW. Environmental & Earth Sciences, 1996;
- Limited Groundwater Investigation of the Former Tarcutta Street Gasworks Site, Wagga Wagga NSW. Environmental & Earth Sciences, 2006;
- March 2007 Groundwater Monitoring at the former Tarcutta Street gasworks Site, Wagga Wagga NSW. Environmental & Earth Sciences, 2007;
- Further Soil, Gas and Groundwater Investigation at the former Tarcutta Street Gasworks Site, on the corner of Tarcutta and Cross Streets in Wagga Wagga. Environmental & Earth Sciences, 2009; and
- Pre-remediation risk monitoring at the former Tarcutta Street Gasworks Site, Wagga Wagga. Environmental & Earth Sciences, 2011.

The review considered groundwater sampling results that were collected from monitoring wells located in the excavation area. The samples are considered representative of source water that will be encountered during the remediation.

#### Ammonia

A total of 49 individual ammonia samples were reviewed. Concentrations of Ammonia ranged from 3.8 mg/L in BH18 (EES 1996) to 950mg/L in BH13 EES 1996. The average ammonia concentration from monitoring wells in the source area is 127.8 mg/L. A summary table of the Historical data is included in Table 2 (attached).

The historic average ammonia concentration includes many more data points than the EPS treatment trial samples, covering a larger area than the EPS pre-treatment. The average of

127.8 mg/L is therefore considered to be a more representative concentration of groundwater that will be encountered during bulk excavation.

The historical average ammonia concentrations are significantly lower than the concentrations used in bench scale trials to date. The bench scale trails have been undertaken date has used composite samples with concentrations of 540, 360, 660 and 1,000 mg/L Ammonia.

#### Conductivity

A total of XX individual conductivity samples were reviewed. Conductivity ranged from 194 (BH19, EES 2011) to 5,610  $\mu$ s/cm (BH6, EES 1996). The historical average conductivity is 1,593  $\mu$ s/cm.

The average historical conductivity is also considered to be more representative of untreated water at the Site. The historical average conductivity is well below the adopted ANZECC discharge criteria (2,200  $\mu$ s/cm).

EPS has used composite samples in treatment trial that had much higher conductivities. Untreated trial samples had conductivities of 4,700 and 4,800  $\mu$ s/cm.

Based on the review of historical data, specific treatment for conductivity may not be required. EPS does however have contingency for conductivity treatment in the form of the RO plant, if required.

#### **Additional Bench Scale Trials**

Additional bench scale trials were undertaken by EPS on the XXXX. The table below provides the ammonia results (mg/L) after each step for all bench scale testing completed.

				S1		S2	S3	S4
	Raw	Coag/Floc	Aeration	Zeolite	GAC	Zeolite	Zeolite	Zeolite
Trial 1	540	390	230	120	82	NT	NT	NT
Trial 2	360	NT	NT	94	88	28	NT	NT
Trial 3	560	NT	240	140	96	44	8.8*	2.4

Table 1: Bench Scale Trial Results

NT - Not Tested

\*Sample Damaged – Result based on photometric analysis

Based on the above test results conservative removal efficiencies for Ammonia at each step of the water treatment plant have been estimated. These are presented below.

Table 2: Re	moval Efficiencies
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			<b>S1</b>		S2	<b>S3</b>	S4
Raw	Coag/Floc	Aeration	Zeolite	GAC	Zeolite	Zeolite	Zeolite
-	25%	50%	40%	25%	50%	50%	50%

These removal efficiencies were used to project the maximum influent concentrations of Ammonia that could be treated by the plant in order to achieve the required discharge criteria.

	-		<b>S1</b>		S2	<b>S3</b>	S4
Raw	Coag/Floc	Aeration	Zeolite	GAC	Zeolite	Zeolite	Zeolite
	25%	50%	40%	25%	50%	50%	50%
83.0	62.2	37.3	28	14	7	3.5	-
165.9	124.4	74.7	56	28	14	7	3.5

Table 2: Projected Influent Ammonia Concentrations WTP

#### **Modifications to Water Treatment Plant**

Based on the above projections EPS have included an additional zeolite filtration capability in the Water Treatment Plant. This will consist of a skid with two zeolite filtration beds, stages 3 and 4.

During commissioning and operation of the plant the raw water will be analysed for ammonia and conductivity and depending on the concentrations the following additional treatment components will be employed.sag

	Additional Treatment
<b>Raw Water Concentration</b>	Equipment Employed
Ammonia <83mg/L	
and	Stage 3 Zeolite Filtration
Conductivity <2200 μs/cm	
Ammonia >83mg/L < 165mg/L	
and	Stage 3 and 4 Zeolite Filtration
and Conductivity <2200 µs/cm	
Ammonia >165mg/L	
or	Reverse Osmosis
Conductivity >2200 μs/cm	

The Stage 3 and 4 zeolite filtration capacity will be incorporated in the plant during initial construction and commissioning. The Reverse Osmosis unit has been included as a contingency and will remain on standby for the duration of the project. Should Ammonia concentrations in excess of 250mg/L be identified in the influent water this unit will be mobilised to site and operational within 1 week.

The reverse osmosis unit will be an independently controlled unit. This will be added to the water treatment plant downstream of the 100 kL storage tank. Water will be treated

through the RO unit and discharged into an adjacent 100 kL storage tank for testing prior to discharge.

## **Reverse Osmosis Specifications**

The primary components of the RO unit are detailed below:

- Feed pump
- Antiscalent dosing with storage tank and low level alarms (flow paced and controlled)
- Feed Acid OR SMBS dosing with bunded storage tank and level alarms
- Feed pH, ORP and conductivity monitoring
- Feed Cartridge filters containing 7 x 40" standard 2.5" cartridge filters (5 micron)
- Cartridge filter feed and outlet pressure transmitters
- High Pressure pump with variable speed drive. VSD controlled via permeate flow setpoint
- Membrane feed pressure transmitter
- Pressure Vessels 6 x 4 element, 300PSI FRP
- Membrane concentrate pressure transmitter
- Permeate flow transmitter
- Concentrate flow transmitter
- Recycle flow transmitter
- Concentrate and Recycle control valves
- CIP tank with automatic permeate fill
- Compressed air system
- Permeate conductivity and pH monitoring
- Permeate Chlorine OR Caustic dosing with bunded storage tank and level alarms
- PLC Control panel with Koyo 205 PLC and 10" colour touch screen

Please refer to the attached GA drawings for further detail.

Anticipated treated water quality following reverse osmosis treatment is provided in Table 4 below.

	Ammonia	Conductivity
	mg/L	μs/cm
Post WTP	82	5626
RO	3.98	80.43
Removal		
Effiency	95%	98%

Table 4: Projected Influent Ammonia Concentrations - RO

#### **Brine Disposal**

Brine generated by the RO unit. Brine will typically comprise 25% of the input volume. The peak brine output will be 1.44 L/s. Brine will stored on site and assessed for potential disposal options including Trade Waste, offsite transport, on site dust suppression or recirculation.

Please do not hesitate to contact me should you require any further information.

Regards

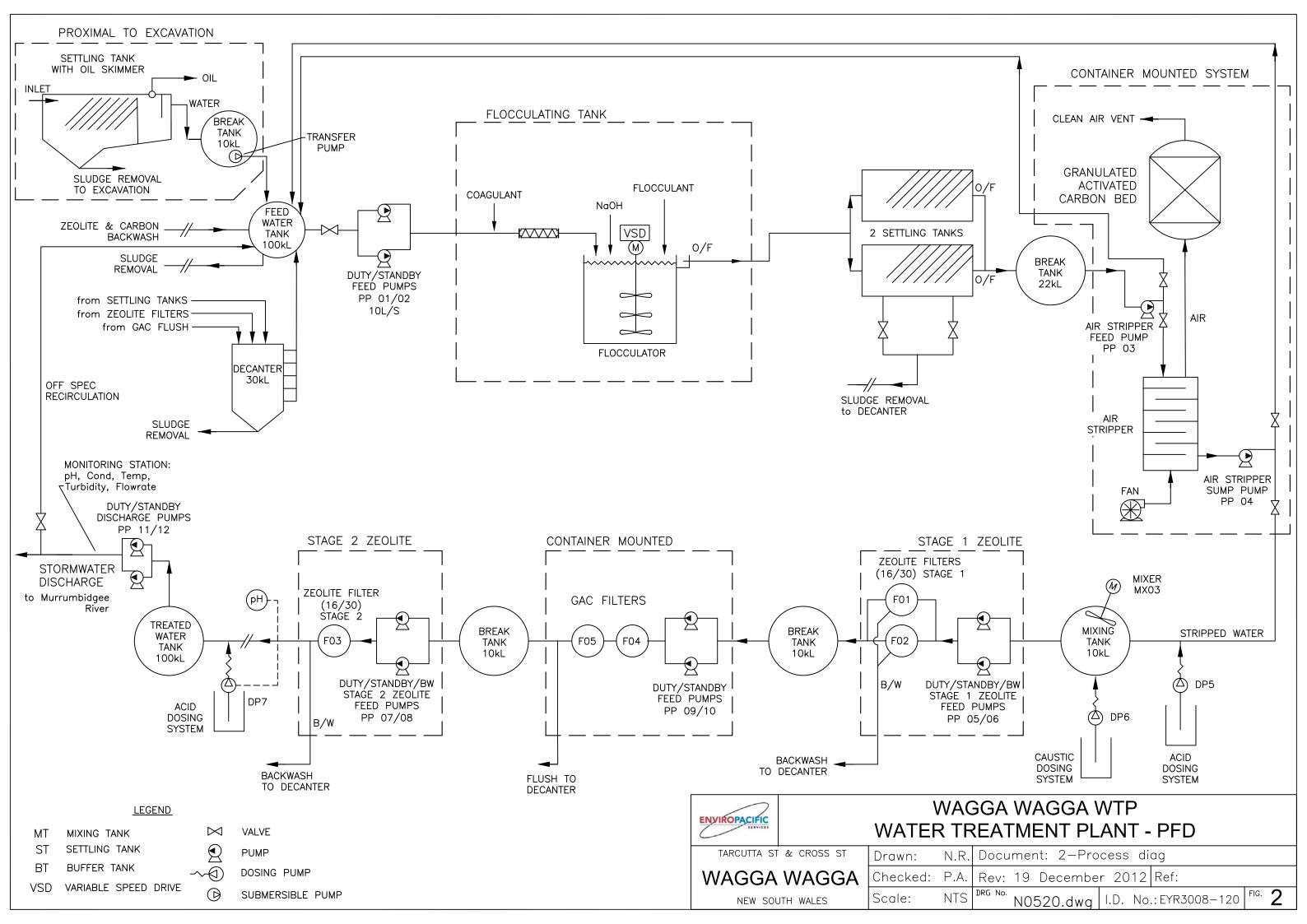
Rhys Blackburn Project Manager Attachments:

- 1. Figures
- 2. Laboratory Summary Table
- 3. Laboratory Certificates
- 4. GA Drawings for RO Plant

# Table 5: Agencies Comments and Response

EPS Response
<ul> <li>EPS have adopted a discharge criteria of 4mg/L. EPS can to achieve this by:</li> <li>Additional zeolite filtration beds</li> <li>Provisions for Reverse Osmosis (RO) treatment, if required</li> </ul>
Refer to letter for further detail Noted, EPS has removed this approach from the modification, including the Murrumbidgee flow data.
Daily air monitoring will be undertaken for Ammonia, VOCs and odour from the air stripper.
Table 6 has been revised to include this monitoring.
Based on trial results we estimate 50% of the ammonia will be removed via the air stripper, however this may decrease at lower concentrations. Report updated to reflect this.
Concentration revised and recalculated.
Emission criteria at the Air Stripper is VOC's = 10 ppm Based on STEL from Safe Work Australia
EPS will apply for an EPL. WWCC as the holder of the Part 3A approval may need to apply for an EPL on behalf of EPS, if required
EPS have adopted this discharge criteria. We have undertaken: - Review of historic groundwater data; - Included additional treatment trials; and - Included contingency tertiary treatment (RO)
EPS have adopted these minimum sampling requirements.

The proposal states that discharge criteria for ammonia and electrical conductivity (EC) will not be at the ANZECC 95% freshwater ecology levels based on several assumptions, including a single grab sample in the Murrumbidgee River and limited groundwater samples. The criteria proposed for ammonia (50 mg/L) and EC (5, 000 S/cm) are not considered justified for the proposal.	Noted and amended
the Office of Water does not object to the proposal, however requests that ANZECC guidelines for protection of 95% freshwater ecology be adopted for all water quality parameters and the Water Management Plan be updated for the site including requirements for monitoring according to Environment Protection Authority requirements.	EPS have adopted the Water Quality Guidelines, ANZECC, 2000 Table 3.4.1. Trigger values for toxicants at alternative levels of protection for the protection of 95% of Freshwater Species, With the exception of Ammonia which is to have a maximum concentration of 4mg/L –as approved by NSW EPA
<b>NSW Fisheries</b> Fisheries NSW seeks assurance that advice on this application will be sought from the Office of Environment & Heritage on whether the proposed discharges to the Murrumbidgee River from the water treatment plant are acceptable under the Protection of the Environment Operations Act 1997.	The WTP will be licensed under the POEO. The license will be held by either EPS or WWCC



#### Wagga Wagga - Gasworks site

Table 6: Anticipated Water Quality compared with ANZECC 2000 for Freshwater Ecosystem (95%)

#### LEGEND: Uncertainty if < ANZECC Higher than ANZECC

Analyte	Units (unless otherwise specified)	UNTREATED AVERAGE [all data]	UN R A E [RAW WATER] Treatment Trial #1	[Coag/Floc] Treatment Trial #1	[High pH/aerated] Treatment Trial #1	[Post Zeolite] [Post Zeolite] Treatment Trial #1 (5 min contact time)	[Post GAC] Treatment Trial #1	Treatment Trial #2 [Raw Water]	Treatment Trial #2 [1st Pass Zeolite]	Treatment Trial #2 [Post GAC]	Treatment Trial #2 [2nd Pass Zeolite]	Untreated - low flow [BH33]	Untreated - low flow [BH35]	Raw Water	Treated - After aeration	Treated - After Stage 1 Zeolite	Treated - After GAC		Treated - After Stage 3 Zeolite		Anticipated treated water concentration	
Date sampled			1/11/2012	1/11/2012	1/11/2012	1/11/2012	1/11/2012	20/11/2012	20/11/2012	20/11/2012	20/11/2012	19/12/2012	19/12/2012	16/01/2013	16/01/2013	16/01/2013	18/01/2013	18/01/2013	18/01/2013	22/01/2013		
Lab Batch No.			81075	81075	81075	81075	81075	81853	81853	81853	81853	83909	83909	84473	84473	84473	84473	84473		84556-A		
рН	pH units	7.0	7.1	7.3	9.5	7.8	8.1							7.1				7.8		7.8	7.8	6.5 - 8.0
Conductivity	μS/cm	4,800	4,700	4,100	4,700	5,400	4,100							6,400				12,000		14,000	14,000	125 - 2200
Ammonia (as N)	μg/L	221,929	540,000	390,000	230,000	120,000	82,000	360,000	94,000	88,000	28,000	1,000,000	660,000	560,000	240,000	140,000	96,000	44,000	8,800	2,400	<4.000	900
Turbidity	NTU	1,890	790	100	17	14	14							430	3			2		5	<6	6 - 50
Aluminium	ug/L	2.220	1.100				350					450	2.200	2.100	<10			460		85	~85	55
Arsenic (III/V)	ug/L	8	21				32	78	10	83	79	13	120	55	16			72		75	~75	24/13 ug/L
Benzene	ug/L	6800	4,400		3		<1							3,800						<5	< 0.03	950
Boron	ug/L	2,000	1,000				30					1,300	1,600	1,700	1,300			380		350	<370	370
Cadmium	μg/L		< 0.1				<0.1	0.9	0.2	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1			<0.1		<0.1	<0.1	0.2
Total Chlorine	μg/L																				<1	3
Chromium (VI)	μg/L	<100	<100	<100	<100		<5					<5	<5	<25	<25			<5		<5	<5	1 μg/L
Cyanide (un-ionised CN)	μg/L	1176	<1	<1	<1		<1					11	<4	10						<10	<10	7 μg/L
Copper	μg/L	8	19				11	95	120	1	25	6	13	14	3			69		65	~65	1.4 µg/L
Lead	μg/L	1.33	6	2	<1		<1	150	<1	<1	<1	5	8	7	<1			3		<5	<5	3.4 μg/L
Manganese	mg/L	2453	4.5				0.044					5,600	6,300	6,200	12			81		100	1	1.9
Mercury	μg/L	< 0.05	<0.05				< 0.05	0.1	< 0.05	< 0.05	< 0.05	<0.05	< 0.05	0.05	<0.05			< 0.05		< 0.25	<0.25	0.6 μg/L
Naphthalene	μg/L	4200	1,800				<0.1							430		<1				<5	<5	16
Nickel	μg/L	55	94				6	240	21	8	5	170	49	89	22			47		10	~10	11 μg/L
Nitrate	mg/L	<0.025	0				0.083														<0.25	0.7
Phenol	μg/L	91000	68,000				<10							690,000		680,000				100	~100	320
2 Chlorophenol	μg/L	<100	<100				<10														<100	490
2,4 - Dichlorophenol	μg/L	<100	<100				<10														<100	160
2,4,6 - Trichlorophenol	μg/L	<100	<100				<10														<20	20
2,3,4,6 - Tetrachlorophenol	μg/L	<100	<100				<10														<20	20
Pentachlorophenol	μg/L	<1000	<1000				<100														<10	10
Selenium (Total)	μg/L	2	1	1	1	1	1					3	5	3	3			1		1	~1	11 μg/L
Silver	μg/L	<0.02	<1	<1	<1	<1	<1					<1	<1	<1	<1			<1		<1	<1	0.05 µg/L
o – xylene	μg/L	353	260		2		<1													<5	<0.1	350
p – xylene	μg/L																				<0.1	200
Zinc	μg/L		93	68	17		12	1,100	24	1	2	26	23	120	16			100		50	~50	8

ALERT - analysis not conducted at low enough LOR to get resolution ALERT - process may not be capable of achieving required level

GHD Geotechnical, Hydrogeological and Environmental Investigation February 2012. Whole report available by request 2. Samples collected by EPS 19th September 2012 for treatability trials - Laboratory certificates attached 3. Samples Collected by EPS 2010 October 2012 for treatability trials - Laboratory certificates attached



Envirolab Services Pty Ltd ABN 37 112 535 645 12 Ashley St Chatswood NSW 2067 ph 02 9910 6200 fax 02 9910 6201 enquiries@envirolabservices.com.au www.envirolabservices.com.au

#### CERTIFICATE OF ANALYSIS

84473-A

Client: Enviropacific Services (Chatswood) Pty Ltd 1/28 Barcoo St Chatswood

Chatswood NSW 2067

Attention: Rhys Blackburn

#### Sample log in details:

Your Reference:EYR3008/120, Wagga GasworksNo. of samples:5 WatersDate samples received / completed instructions received22/01/13This report contains results previously reported in 84473.

#### Analysis Details:

Please refer to the following pages for results, methodology summary and quality control data. Samples were analysed as received from the client. Results relate specifically to the samples as received. Results are reported on a dry weight basis for solids and on an as received basis for other matrices. *Please refer to the last page of this report for any comments relating to the results.* 

#### **Report Details:**

 Date results requested by: / Issue Date:
 26/01/13
 / 25/01/13

 Date of Preliminary Report:
 22/01/2013

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 Tests not covered by NATA are denoted with \*.

#### **Results Approved By:**

Nick Sarlamis Inorganics Supervisor



# Client Reference: EYR3008/120, Wagga Gasworks

Miscellaneous Inorganics						
Our Reference:	UNITS	84473-A-1	84473-A-2	84473-A-3	84473-A-4	84473-A-5
Your Reference		Raw Water	After Aeration	Stage 1 Zeolite	GAC	Stage 2 zeolite/ Treated water
Date Sampled		16/01/2013	16/01/2013	18/01/2013	18/01/2013	21/01/2013
Type of sample		Water	Water	Water	Water	Water
Date prepared	-	22/01/2013	22/01/2013	22/01/2013	22/01/2013	22/01/2013
Date analysed	-	22/01/2013	22/01/2013	22/01/2013	22/01/2013	22/01/2013
Ammonia as N in water	mg/L	560	240	140	96	44

MethodID	Methodology Summary
Inorg-057	Ammonia - determined colourimetrically based on EPA350.1 and APHA 22nd ED 4500-NH3 F, Soils are analysed following a KCI extraction.

		<b>Client Reference:</b>			YR3008/120,	Wagga Gasworks		
QUALITYCONTROL	UNITS	PQL	METHOD	Blank	Duplicate Sm#	Duplicate results	Spike Sm#	Spike % Recovery
Miscellaneous Inorganics						Base II Duplicate II % RPD		
Date prepared	-			22/01/2 013	[NT]	[NT]	LCS-W1	22/01/2013
Date analysed	-			22/01/2 013	[NT]	[NT]	LCS-W1	22/01/2013
Ammonia as N in water	mg/L	0.005	Inorg-057	<0.005	[NT]	[NT]	LCS-W1	109%

#### **Report Comments:**

Asbestos ID was analysed by Approved Identifier: Asbestos ID was authorised by Approved Signatory: Not applicable for this job Not applicable for this job

INS: Insufficient sample for this testPQL: Practical Quantitation LimitNT:NA: Test not requiredRPD: Relative Percent DifferenceNA<: Less than</td>>: Greater thanLCS

NT: Not tested NA: Test not required LCS: Laboratory Control Sample

#### **Quality Control Definitions**

**Blank**: This is the component of the analytical signal which is not derived from the sample but from reagents, glassware etc, can be determined by processing solvents and reagents in exactly the same manner as for samples. **Duplicate**: This is the complete duplicate analysis of a sample from the process batch. If possible, the sample selected should be one where the analyte concentration is easily measurable.

Matrix Spike : A portion of the sample is spiked with a known concentration of target analyte. The purpose of the matrix spike is to monitor the performance of the analytical method used and to determine whether matrix interferences exist. LCS (Laboratory Control Sample) : This comprises either a standard reference material or a control matrix (such as a blank sand or water) fortified with analytes representative of the analyte class. It is simply a check sample.

**Surrogate Spike:** Surrogates are known additions to each sample, blank, matrix spike and LCS in a batch, of compounds which are similar to the analyte of interest, however are not expected to be found in real samples.

#### Laboratory Acceptance Criteria

Duplicate sample and matrix spike recoveries may not be reported on smaller jobs, however, were analysed at a frequency to meet or exceed NEPM requirements. All samples are tested in batched of 20. The duplicate sample RPD and matrix spike recoveries for the batch were within the laboratory acceptance criteria.

Duplicates: <5xPQL - any RPD is acceptable; >5xPQL - 0-50% RPD is acceptable. Matrix Spikes, LCS and Surrogate recoveries: Generally 70-130% for inorganics/metals; 60-140% for organics and 10-140% for SVOC and speciated phenols is acceptable.



Envirolab Services Pty Ltd ABN 37 112 535 645 12 Ashley St Chatswood NSW 2067 ph 02 9910 6200 fax 02 9910 6201 enquiries@envirolabservices.com.au www.envirolabservices.com.au

#### CERTIFICATE OF ANALYSIS

84556-A

Client: Enviropacific Services (Chatswood) Pty Ltd 1/28 Barcoo St Chatswood

Attention: Rhys Blackburn

#### Sample log in details:

NSW 2067

Your Reference: No. of samples: Date samples received / completed instructions received *This report contains results previously reported in 84556.* 

EYR3008/120,	Wag	ga Gasworks	
1 Water			
23/01/2013	/	23/01/2013	

#### Analysis Details:

Please refer to the following pages for results, methodology summary and quality control data. Samples were analysed as received from the client. Results relate specifically to the samples as received. Results are reported on a dry weight basis for solids and on an as received basis for other matrices. *Please refer to the last page of this report for any comments relating to the results.* 

#### **Report Details:**

 Date results requested by: / Issue Date:
 26/01/13
 / 25/01/13

 Date of Preliminary Report:
 Not issued

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 Tests not covered by NATA are denoted with \*.

#### **Results Approved By:**

Nick Sarlamis Inorganics Supervisor

# Client Reference: EYR3008/120, Wagga Gasworks

Miscellaneous Inorganics Our Reference: Your Reference	UNITS	84556-A-1 Stage 4 / Treated Water
Date Sampled Type of sample		16/01/2013 Water
Date prepared	-	23/01/2013
Date analysed	-	23/01/2013
Ammonia as N in water	mg/L	2.4

MethodID	Methodology Summary
Inorg-057	Ammonia - determined colourimetrically based on EPA350.1 and APHA 22nd ED 4500-NH3 F, Soils are analysed following a KCI extraction.

		<b>Client Reference:</b>			YR3008/120,	Wagga Gasworks		
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Miscellaneous Inorganics						Base II Duplicate II % RPD		
Date prepared	-			23/01/2 013	[NT]	[NT]	LCS-W1	23/01/2013
Date analysed	-			23/01/2 013	[NT]	[NT]	LCS-W1	23/01/2013
Ammonia as N in water	mg/L	0.005	Inorg-057	<0.005	[NT]	[NT]	LCS-W1	105%

#### **Report Comments:**

Asbestos ID was analysed by Approved Identifier: Asbestos ID was authorised by Approved Signatory: Not applicable for this job Not applicable for this job

INS: Insufficient sample for this testPQL: Practical Quantitation LimitNT:NA: Test not requiredRPD: Relative Percent DifferenceNA<: Less than</td>>: Greater thanLCS

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