TANGLED WEB OF LABORATORY FRAUD IN CALIFORNIA

2019 NATIONAL ENVIRONMENTAL MONITORING CONFERENCE

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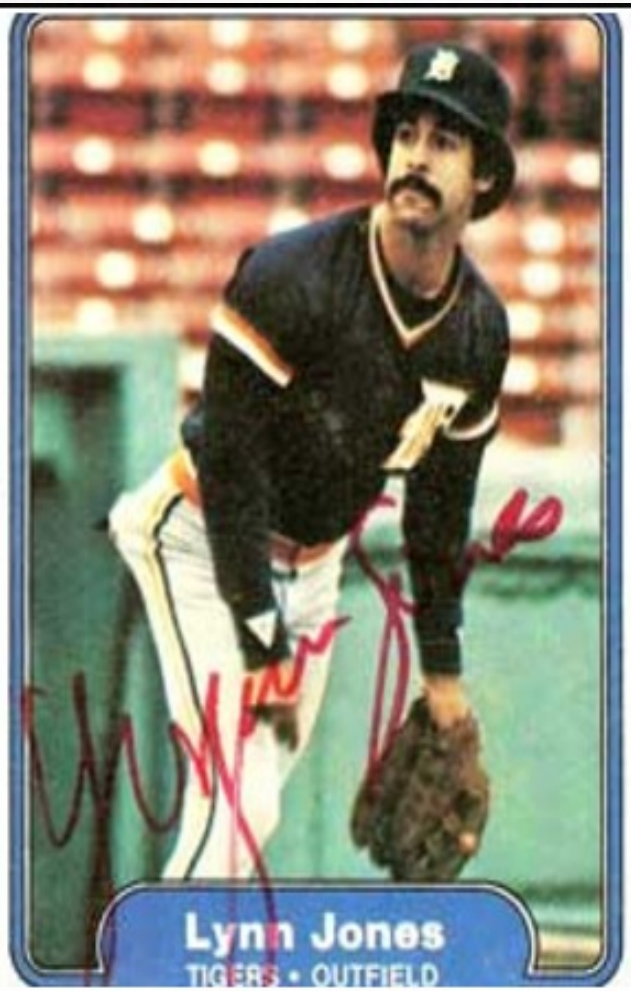
California Environmental Laboratory Accreditation Program

OBJECTIVES

GOAL OF ELAP'S ENFORCEMENT UNIT

PROSECUTORIAL FRAMEWORK

SUMMARY OF CRIMINAL CASE



The worst program in the world, if you believe in it 100%, is better than a great program that you don't believe in.

— Lynn Jones —

AZ QUOTES

STATE WATER BOARD HAS A REPUTATION FOR ENFORCEMENT

- Created An Enforcement Unit
- Partnered With State Water Board Office Of Enforcement
- Developed Skills And Tools

GOAL OF ENFORCEMENT UNIT

Protect Public Health And The Environment By Preventing Violations And Effectively Enforcing Laws, Regulations, And Laboratory Standards When Violations Occur

- **Separation of Function**
- **Complaint Based, Risk Based**

ELAP IS NO LONGER "A PAPER TIGER"

- Philosophy Of Progressive Enforcement
  - Notice Of Violation
  - Monetary Penalties
  - Suspension
  - Revocation
- Conducted 60 Investigations Since 2015
- Uncovered A Tangled Web Of Laboratory Fraud

PROSECUTORIAL FRAMEWORK

Criminal

Beyond a Reasonable Doubt

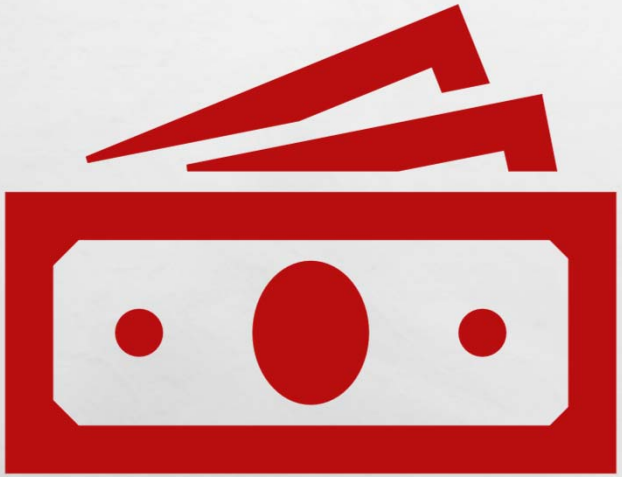
Civil

Preponderance of Evidence

Administrative

Substantial Evidence

BACKGROUND OF CRIMINAL CASE



- California's UST Cleanup Fund Is Financed By A 2-cent Per Gallon Gasoline Tax
- The Fund Is Used To Reimburse Contractors Who Perform Cleanup Of Petroleum Leaks At UST Facilities Statewide (Up To $1.5 Million Per Site)
- The Fund Has Reimbursed More Than $3.6 Billion Since 1992, Including $132 Million In 2016
- About 8,700 Sites Have Been Remediated And Closed Since The Fund's Inception In 1989

THE REFERRAL

- Rumors That Cal Tech Environmental Laboratories Will "Give You The Results You Want"
- Data Package With Multiple Red Flags
  - Misspellings, Different Fonts
  - Pattern Of QC Results Without Variation
  - QC And Client Sample Results Inconsistent With Raw Data
  - Altered Data

SEARCH WARRANT

- After 6 Hour Interview, Roobik Yaghoubi (Owner/Lab Director) Admits That His Client Asked Him To Change Data In Order To Justify More Clean Up And Get Reimbursed By The Clean Up Fund

- Seized 36 Boxes Of Analytical Data

FAILING QC

Quantitation Report (Not Reviewed)

Data File : C:\MSDchem\3\DATA\E40204\E402039.D Vial: 9
Acq On : 4 Feb 2014 Operator:
Sample : 02-005-02a 1x [redacted] Inst : GCMS E
Misc : Multiplr: 1.00
MS Integration Params: events.e
Quant Time: Feb 04 14:59:45 2014 Quant Results File: E31007G.RES

Quant Method : C:\MSDCHEM\3\METHODS\E31007G.M (Chemstation Integrator)
Title : 8260 cal
Last Update : Tue Oct 22 10:32:03 2013
Response via : Initial Calibration
DataAcq Meth : E31007G

Internal Standards	R.T.	QIon	Response	Conc	Units	Dev(Min)
1) Pentafluorobenzene	8.93	168	10404443	50.00	ug/L	0.00
33) 1,4-Difluorobenzene	10.40	114	15341460	50.00	ug/L	0.00
60) Chlorobenzene D5	14.48	82	1603106	50.00	ug/L	0.00
69) 1,4-Dichlorobenzene D4	17.58	152	3592968	50.00	ug/L	0.00
System Monitoring Compounds						
25) Dibromofluoromethane	9.17	111	4921789	49.85	ug/L	0.00
Spiked Amount 50.000			Recovery =	99.70%		
27) 1,2-Dichloroethane-D4	9.87	65	4129467	40.64	ug/L	0.00
Spiked Amount 50.000			Recovery =	81.28%		
43) Toluene d8	12.49	98	6620361	20.10	ug/L	0.00
Spiked Amount 50.000			Recovery =	40.20%		
80) Bromofluorobenzene	16.03	95	4050103	61.51	ug/L	0.00
Spiked Amount 50.000			Recovery =	123.02%		
Target Compounds						Qvalue
3) Chloromethane	3.39	50	90995	0.84	ug/L #	48
8) Acetone	5.44	43	57666	Below Cal	#	59
63) 2-Chlorotoluene	16.41	91	217169	2.58	ug/L #	53
64) 4-Chlorotoluene	16.41	91	217452	2.51	ug/L #	42
65) 1,3,5-Trimethylbenzene	16.41	105	2192254	20.07	ug/L #	96
66) Tert-butylbenzene	16.75	119	45716	0.40	ug/L #	1
67) 1,2,4-Trimethylbenzene	16.75	105	2952039	26.60	ug/L #	66
72) p-Isopropyltoluene	17.56	119	175491	0.61	ug/L #	38
77) Naphthalene	20.63	128	357173	2.48	ug/L #	87

Toluene d8 is 40.20%, Which is Below the Acceptable Range of 70%-130%

CTEL Project No [redacted]

Project ID: [redacted]
Project Name:

Laboratory ID: / Client Sample ID:	1402-005-1 MW-1	1402-005-2 MW-2	1402-005-3 MW-5	Method	Units	Detection Limit
1,2-Dibromoethane(EDB)	ND	ND	ND	EPA 8260B	ug/L	0.5
1,3-Dichloropropane	ND	ND	ND	EPA 8260B	ug/L	1
Dibromochloromethane	ND	ND	ND	EPA 8260B	ug/L	1
2-Hexanone	ND	ND	ND	EPA 8260B	ug/L	10
Tetrachloroethene	ND	ND	ND	EPA 8260B	ug/L	1
Chlorobenzene	ND	ND	ND	EPA 8260B	ug/L	1
1,1,1,2-Tetrachloroethane	ND	ND	ND	EPA 8260B	ug/L	1
Ethylbenzene	26	ND	52	EPA 8260B	ug/L	0.5
m,p-Xylene	97	ND	63	EPA 8260B	ug/L	0.6
1,2 Dibromo-3-Chloropropane	ND	ND	ND	EPA 8260B	ug/L	1
1,2,4-Trichlorobenzene	ND	ND	ND	EPA 8260B	ug/L	1
Naphthalene	7.9	2.5	44	EPA 8260B	ug/L	1
1,2,3-Trichlorobenzene	ND	ND	ND	EPA 8260B	ug/L	1
Hexachlorobutadiene	ND	ND	ND	EPA 8260B	ug/L	1
TPH - Gasoline	3000	500	2600	EAP 8015M	ug/L	50

Cal Tech Changed the Surrogate Recovery from 40.20% to 92% to Make the Data Appear Acceptable

ND = Not Detected at the indicated Detection Limit

SURROGATE SPIKE	% SURROGATE RECOVERY			Control Limit
Dibromofluoromethane	99	100	98	70-130
1,2 Dichloromethaned4	97	98	98	70-130
Toluene-d8	93	92	96	70-130
Bromofluorobenzene	97	100	94	70-130

2

ELAP01_SW01_0004385

OMITTING QC

Quantitation Report (Not Reviewed)

Data File : C:\HPCHEM\1\DATA\C40423\C404138.D Vial: 8
Acq On : 23 Apr 2014 4:20 pm Operator:
Sample : 04-106-01 50x [redacted] Inst : GC/MS #3
Misc : Multiplr: 1.00
MS Integration Params: events.e
Quant Time: Apr 23 16:51 19114 Quant Results File: C31009.RES

Quant Method : C:\HPCHEM\1\METHODS\C31009.M (Chemstation Integrator)
Title : 8260 cal
Last Update : Tue Feb 11 09:43:18 2014
Response via : Initial Calibration
DataAcq Meth : C31009

Internal Standards	R.T.	QIon	Response	Conc Units	Dev(Min)
1) Pentafluorobenzene	9.44	168	108436	50.00 ug/L	-0.04
34) 1,4-Difluorobenzene	11.77	114	157841	50.00 ug/L	-0.04
61) Chlorobenzene D5	18.50	82	81844	50.00 ug/L	-0.03
70) 1,4-Dichlorobenzene D4	23.66	152	88785	50.00 ug/L	-0.03
System Monitoring Compounds					
25) Dibromofluoromethane	0.00	111	0	0.00 ug/L	
Spiked Amount 50.000			Recovery =	0.00%	
27) 1,2-Dichloroethane-D4	0.00	65	0	0.00 ug/L	
Spiked Amount 50.000			Recovery =	0.00%	
44) Toluene d8	15.18	98	189563	43.83 ug/L	-0.04
Spiked Amount 50.000			Recovery =	87.66%	
81) Bromofluorobenzene	21.12	95	82760	52.80 ug/L	-0.03
Spiked Amount 50.000			Recovery =	105.60%	
Target Compounds					Qvalue
31) Benzene	11.17	78	133932	33.64 ug/L #	47
45) Toluene	15.35	91	893577	191.82 ug/L	97
53) Ethyl benzene	18.68	91	108679	17.95 ug/L #	55
54) m,p-Xylenes	18.85	91	512355	110.96 ug/L #	84
57) o-Xylene	19.80	91	243971	48.07 ug/L #	73
66) 1,3,5-Trimethylbenzene	21.63	105	133402	33.13 ug/L #	47
68) 1,2,4-Trimethylbenzene	22.60	105	168483	39.81 ug/L #	79
69) sec-Butylbenzene	22.60	105	168470	28.76 ug/L #	58
78) Naphthalene	28.66	128	65809	32.70 ug/L #	66

ND = Not Detected at the indicated Detection Limit

SURROGATE SPIKE	% SURROGATE RECOVERY			Control Limit
Dibromofluoromethane	100	99	100	70-130
1,2 Dichloroethaned4	100	99	99	70-130
Toluene-d8	98	98	97	70-130
Bromofluorobenzene	106	101	104	70-130

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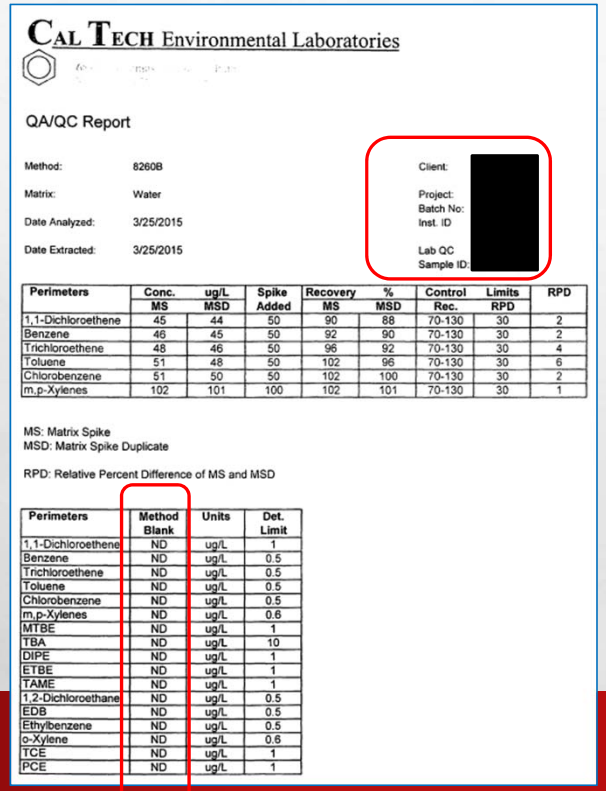
Surrogate Recoveries for Dibromofluoromethane and 1,2-Dichloroethane-D4 were Both Detected as 0%, but Reported as 100% to Make the Data Appear Acceptable

EXPUNGING; NO VARIATION IN METHOD BLANK RESULTS



CAL TECH Environmental Laboratories

QA/QC Report

Method: 8260B
Matrix: Water
Date Analyzed: 3/25/2015
Date Extracted: 3/25/2015

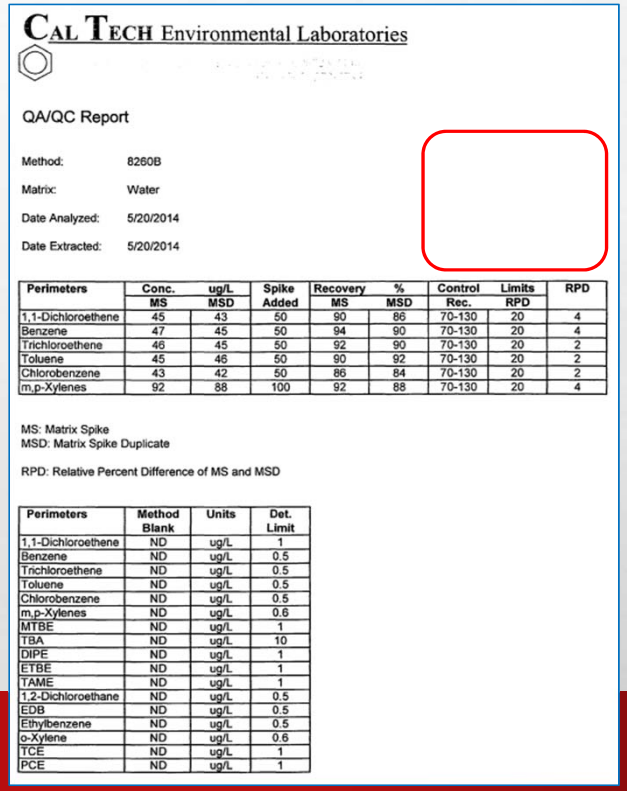
Client: [redacted]
Project:
Batch No:
Inst. ID
Lab QC Sample ID:

Perimeters	Conc. MS	ug/L MSD	Spike Added	Recovery MS	% MSD	Control Rec.	Limits RPD	RPD
1,1-Dichloroethene	45	44	50	90	88	70-130	30	2
Benzene	46	45	50	92	90	70-130	30	2
Trichloroethene	48	46	50	96	92	70-130	30	4
Toluene	51	48	50	102	96	70-130	30	6
Chlorobenzene	51	50	50	102	100	70-130	30	2
m,p-Xylenes	102	101	100	102	101	70-130	30	1

MS: Matrix Spike
MSD: Matrix Spike Duplicate

RPD: Relative Percent Difference of MS and MSD

Perimeters	Method Blank	Units	Det. Limit
1,1-Dichloroethene	ND	ug/L	1
Benzene	ND	ug/L	0.5
Trichloroethene	ND	ug/L	0.5
Toluene	ND	ug/L	0.5
Chlorobenzene	ND	ug/L	0.5
m,p-Xylenes	ND	ug/L	0.6
MTBE	ND	ug/L	1
TBA	ND	ug/L	10
DIPE	ND	ug/L	1
ETBE	ND	ug/L	1
TAME	ND	ug/L	1
1,2-Dichloroethane	ND	ug/L	0.5
EDB	ND	ug/L	0.5
Ethylbenzene	ND	ug/L	0.5
o-Xylene	ND	ug/L	0.6
TCE	ND	ug/L	1
PCE	ND	ug/L	1



CAL TECH Environmental Laboratories

QA/QC Report

Method: 8260B
Matrix: Water
Date Analyzed: 5/20/2014
Date Extracted: 5/20/2014

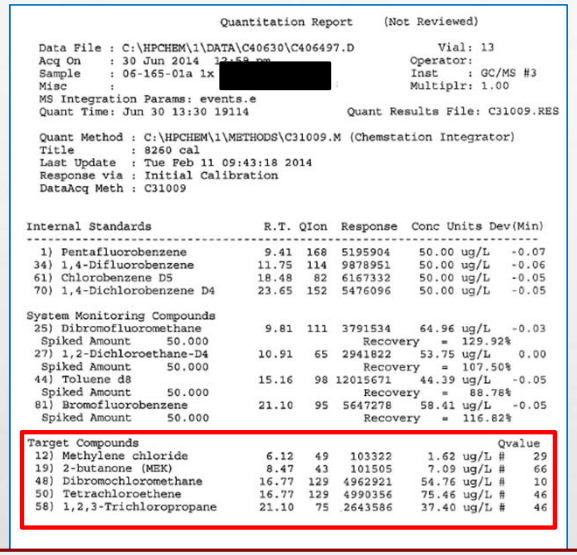
Perimeters	Conc. MS	ug/L MSD	Spike Added	Recovery MS	% MSD	Control Rec.	Limits RPD	RPD
1,1-Dichloroethene	45	43	50	90	86	70-130	20	4
Benzene	47	45	50	94	90	70-130	20	4
Trichloroethene	46	45	50	92	90	70-130	20	2
Toluene	45	46	50	90	92	70-130	20	2
Chlorobenzene	43	42	50	86	84	70-130	20	2
m,p-Xylenes	92	88	100	92	88	70-130	20	4

MS: Matrix Spike
MSD: Matrix Spike Duplicate

RPD: Relative Percent Difference of MS and MSD

Perimeters	Method Blank	Units	Det. Limit
1,1-Dichloroethene	ND	ug/L	1
Benzene	ND	ug/L	0.5
Trichloroethene	ND	ug/L	0.5
Toluene	ND	ug/L	0.5
Chlorobenzene	ND	ug/L	0.5
m,p-Xylenes	ND	ug/L	0.6
MTBE	ND	ug/L	1
TBA	ND	ug/L	10
DIPE	ND	ug/L	1
ETBE	ND	ug/L	1
TAME	ND	ug/L	1
1,2-Dichloroethane	ND	ug/L	0.5
EDB	ND	ug/L	0.5
Ethylbenzene	ND	ug/L	0.5
o-Xylene	ND	ug/L	0.6
TCE	ND	ug/L	1
PCE	ND	ug/L	1

ALTERING DATA

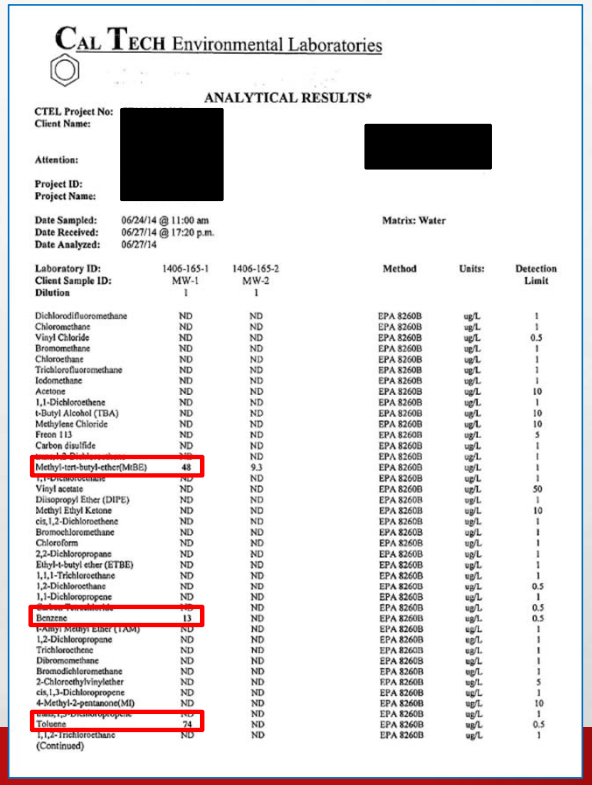


Quantitation Report (Not Reviewed)

Data File : C:\HPCHEM\1\DATA\C40630\C406497.D Vial: 13
Acq On : 30 Jun 2014 [redacted] Operator:
Sample : 06-165-01a 1x Inst : GC/MS #3
Misc : Multiplr: 1.00
MS Integration Params: events.e
Quant Time: Jun 30 13:30 19114 Quant Results File: C31009.RES

Quant Method : C:\HPCHEM\1\METHODS\C31009.M (Chemstation Integrator)
Title : 8260 cal
Last Update : Tue Feb 11 09:43:18 2014
Response via : Initial Calibration
DataAcq Meth : C31009

Internal Standards	R.T.	QIon	Response	Conc	Units	Dev(Min)
1) Pentafluorobenzene	9.41	168	5195904	50.00	ug/L	-0.07
34) 1,4-Difluorobenzene	11.75	114	9878951	50.00	ug/L	-0.06
61) Chlorobenzene D5	18.48	82	6167332	50.00	ug/L	-0.05
70) 1,4-Dichlorobenzene D4	23.65	152	5476096	50.00	ug/L	-0.05
System Monitoring Compounds						
25) Dibromofluoromethane	9.81	111	3791534	64.96	ug/L	-0.03
Spiked Amount 50.000			Recovery = 129.92%			
27) 1,2-Dichloroethane-D4	10.91	65	2941822	53.75	ug/L	0.00
Spiked Amount 50.000			Recovery = 107.50%			
44) Toluene d8	15.16	98	12015671	44.39	ug/L	-0.05
Spiked Amount 50.000			Recovery = 88.78%			
81) Bromofluorobenzene	21.10	95	5647278	58.41	ug/L	-0.05
Spiked Amount 50.000			Recovery = 116.82%			
Target Compounds						Qvalue
12) Methylene chloride	6.12	49	103322	1.62	ug/L	# 29
19) 2-butanone (MEK)	8.47	43	101505	7.09	ug/L	# 66
48) Dibromochloromethane	16.77	129	4962921	54.76	ug/L	# 10
50) Tetrachloroethene	16.77	129	4990356	75.46	ug/L	# 46
58) 1,2,3-Trichloropropane	21.10	75	2643586	37.40	ug/L	# 46



CAL TECH Environmental Laboratories

ANALYTICAL RESULTS*

CTEL Project No:
Client Name: [redacted]
Attention: [redacted]
Project ID:
Project Name:

Date Sampled: 06/24/14 @ 11:00 am
Date Received: 06/27/14 @ 17:20 p.m.
Date Analyzed: 06/27/14

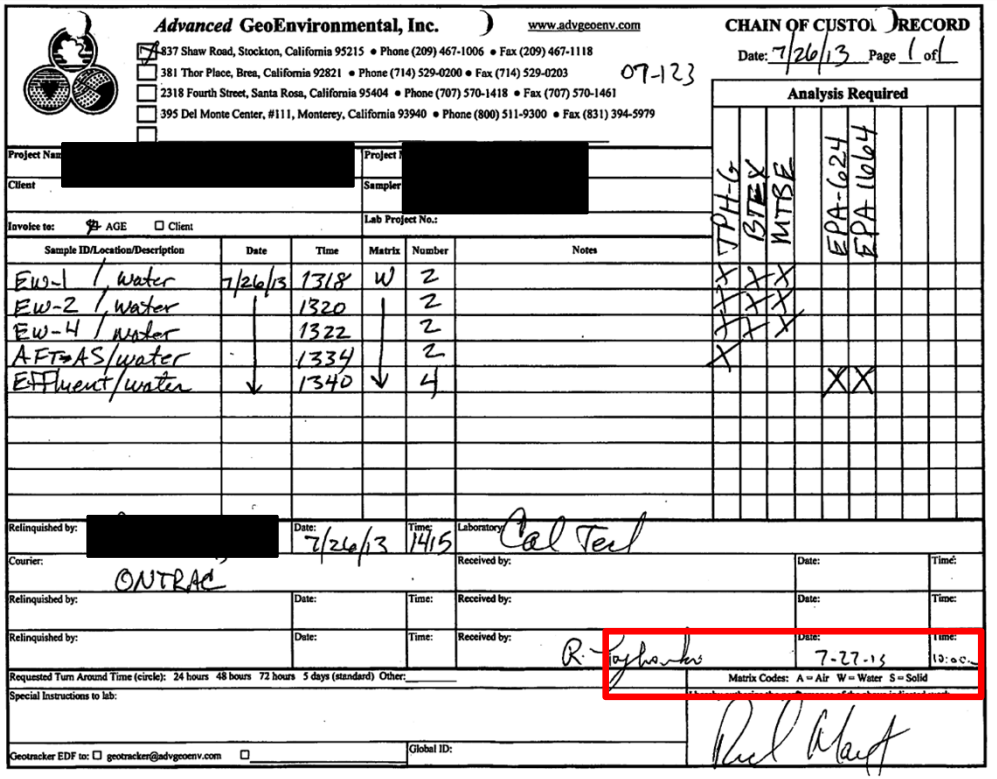
Matrix: Water

Laboratory ID:	1406-165-1	1406-165-2	Method	Units:	Detection Limit
Client Sample ID:	MW-1	MW-2			
Dilution	1	1			
Dichlorodifluoromethane	ND	ND	EPA 8260B	ug/L	1
Chloromethane	ND	ND	EPA 8260B	ug/L	1
Vinyl Chloride	ND	ND	EPA 8260B	ug/L	0.5
Bromomethane	ND	ND	EPA 8260B	ug/L	1
Chloroethane	ND	ND	EPA 8260B	ug/L	1
Trichlorofluoromethane	ND	ND	EPA 8260B	ug/L	1
Iodomethane	ND	ND	EPA 8260B	ug/L	1
Acetone	ND	ND	EPA 8260B	ug/L	10
1,1-Dichloroethene	ND	ND	EPA 8260B	ug/L	1
t-Butyl Alcohol (TBA)	ND	ND	EPA 8260B	ug/L	10
Methylene Chloride	ND	ND	EPA 8260B	ug/L	10
Freon 113	ND	ND	EPA 8260B	ug/L	5
Carbon disulfide	ND	ND	EPA 8260B	ug/L	1
[redacted]	ND	ND	EPA 8260B	ug/L	1
Methyl-tert-butyl-ether(MtBE)	48	9.3	EPA 8260B	ug/L	1
[redacted]	ND	ND	EPA 8260B	ug/L	1
Vinyl acetate	ND	ND	EPA 8260B	ug/L	50
Diisopropyl Ether (DIPE)	ND	ND	EPA 8260B	ug/L	1
Methyl Ethyl Ketone	ND	ND	EPA 8260B	ug/L	10
cis,1,2-Dichloroethene	ND	ND	EPA 8260B	ug/L	1
Bromochloromethane	ND	ND	EPA 8260B	ug/L	1
Chloroform	ND	ND	EPA 8260B	ug/L	1
2,2-Dichloropropane	ND	ND	EPA 8260B	ug/L	1
Ethyl-t-butyl ether (ETBE)	ND	ND	EPA 8260B	ug/L	1
1,1,1-Trichloroethane	ND	ND	EPA 8260B	ug/L	1
1,2-Dichloroethane	ND	ND	EPA 8260B	ug/L	0.5
1,1-Dichloropropene	ND	ND	EPA 8260B	ug/L	1
[redacted]	ND	ND	EPA 8260B	ug/L	0.5
Benzene	13	ND	EPA 8260B	ug/L	0.5
Diethyl Methyl Ether (TAM)	ND	ND	EPA 8260B	ug/L	1
1,2-Dichloropropane	ND	ND	EPA 8260B	ug/L	1
Trichloroethene	ND	ND	EPA 8260B	ug/L	1
Dibromomethane	ND	ND	EPA 8260B	ug/L	1
Bromodichloromethane	ND	ND	EPA 8260B	ug/L	1
2-Chloroethylvinylether	ND	ND	EPA 8260B	ug/L	5
cis,1,3-Dichloropropene	ND	ND	EPA 8260B	ug/L	1
4-Methyl-2-pentanone(MI)	ND	ND	EPA 8260B	ug/L	10
[redacted]	ND	ND	EPA 8260B	ug/L	1
Toluene	74	ND	EPA 8260B	ug/L	0.5
1,1,2-Trichloroethane	ND	ND	EPA 8260B	ug/L	1

(Continued)

MTBE, Benzene, and Toluene Not Detected; but Reported at 48, 13, and 74 µg/L

BROKEN CHAIN OF CUSTODY



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07-123

CHAIN OF CUSTODY RECORD

Date: 7/26/13 Page 1 of 1

Project Name: [redacted] Project #:
Client: Sampler: [redacted]
Invoice to: ☒ AGE ☐ Client Lab Project No.:

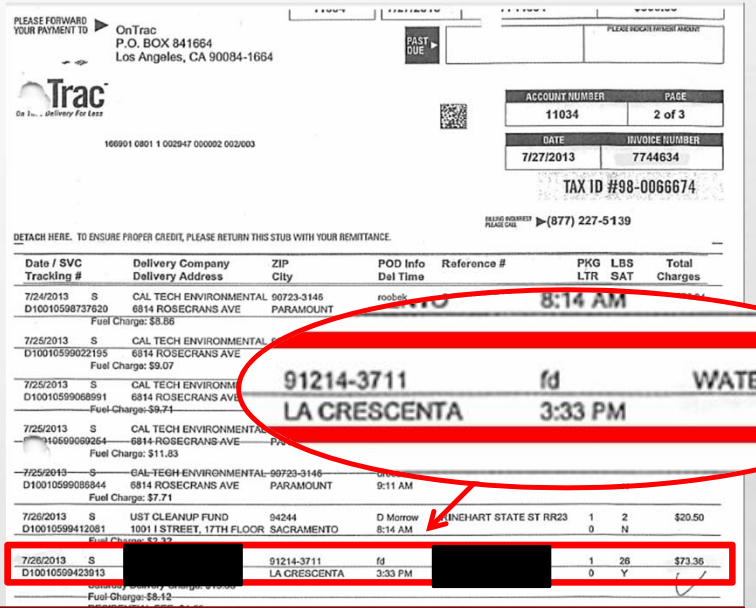
Analysis Required: TPH-G, BTEX, MTBE, EPA-624, EPA-1664

Sample ID/Location/Description	Date	Time	Matrix	Number	Notes
EW-1 / Water	7/26/13	1318	W	2	
EW-2 / Water		1320		2	
EW-4 / Water		1322		2	
AFT-AS/Water		1334		2	
Effluent/Water	↓	1340	↓	4	XX

Relinquished by: [redacted] Date: 7/26/13 Time: 1415 Laboratory: Cal Tech
Courier: ONTRAC Received by: Date: Time:
Relinquished by: Date: Time: Received by: Date: Time:
Relinquished by: Date: Time: Received by: R. Toghrakar Date: 7-27-13 Time: 10:00

Requested Turn Around Time (circle): 24 hours 48 hours 72 hours 5 days (standard) Other:
Matrix Codes: A = Air W = Water S = Solid
Special Instructions to lab:
Geotracker EDF to: ☐ geotracker@advgeoenv.com ☐
Global ID:

Rick Mart



PLEASE FORWARD YOUR PAYMENT TO ▶ OnTrac
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ACCOUNT NUMBER 11034 | PAGE 2 of 3
DATE 7/27/2013 | INVOICE NUMBER 7744634
TAX ID #98-0066674

166901 0801 1 002947 000002 002/003

DETACH HERE. TO ENSURE PROPER CREDIT, PLEASE RETURN THIS STUB WITH YOUR REMITTANCE.

PLEASE DIRECT ▶(877) 227-5139

Date / SVC Tracking #	Delivery Company Delivery Address	ZIP City	POD Info Del Time	Reference #	PKG LTR	LBS SAT	Total Charges
7/24/2013 S D10010598737620	CAL TECH ENVIRONMENTAL 6814 ROSECRANS AVE	90723-3146 PARAMOUNT	roobek 8:14 AM				
Fuel Charge: $8.86							
7/25/2013 S D10010599022195	CAL TECH ENVIRONMENTAL 6814 ROSECRANS AVE						
Fuel Charge: $9.07							
7/25/2013 S D10010599068991	CAL TECH ENVIRONM 6814 ROSECRANS AVE						
Fuel Charge: $9.71							
7/25/2013 S D10010599069264	CAL TECH ENVIRONMENTAL 6814 ROSECRANS AVE						
Fuel Charge: $11.83							
7/25/2013 S D10010599086844	CAL TECH ENVIRONMENTAL 6814 ROSECRANS AVE	90723-3146 PARAMOUNT	9:11 AM				
Fuel Charge: $7.71							
7/26/2013 S D10010599412081	UST CLEANUP FUND 1001 I STREET, 17TH FLOOR	94244 SACRAMENTO	D Morrow 8:14 AM	HINEHART STATE ST RR23	1 0	2 N	$20.50
Fuel Charge: $2.32							
7/26/2013 S D10010599423913	[redacted]	91214-3711 LA CRESCENTA	fd 3:33 PM	[redacted]	1 0	26 Y	$73.36
Fuel Charge: $8.12							

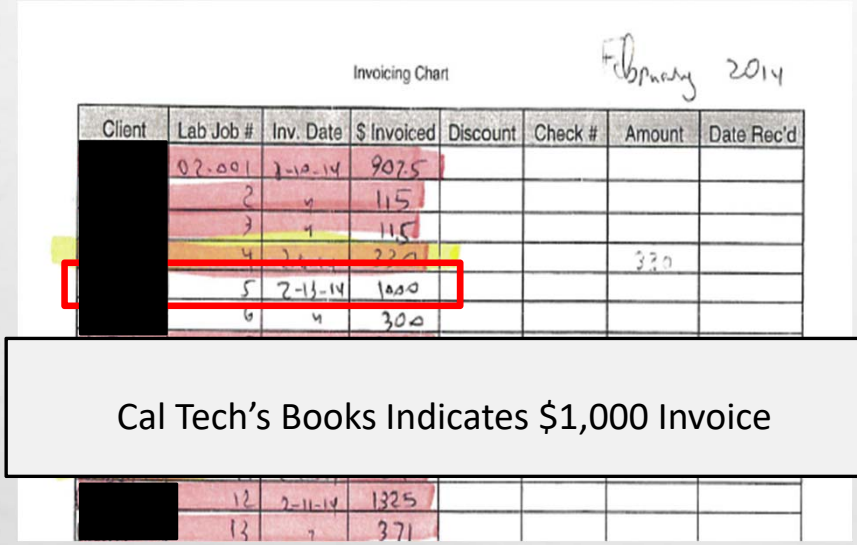
91214-3711 fd WATERLOO FF
LA CRESCENTA 3:33 PM

Roobik Received The Samples At His House

At 10:00 AM, 5.5 Hours Before Ontrac

Delivered Them

DOUBLE INVOICING



Invoicing Chart — February 2014

Client	Lab Job #	Inv. Date	$ Invoiced	Discount	Check #	Amount	Date Rec'd
[redacted]	02-001	2-10-14	907.5				
	2	"	115				
	3	"	115				
	4	2-[illegible]-14	220			330	
	5	2-13-14	1000				
	6	"	300				
[redacted]	12	2-11-14	1325				
	13	"	371				

Cal Tech's Books Indicates $1,000 Invoice

CAL TECH Environmental Laboratories

6814 Rosecrans Avenue, Paramount, [illegible]

Telephone: (562) [illegible] Fax: [illegible]

INVOICE

TERMS: NET 20 DAYS

Invoice # : [redacted]
Client Name :
Address:

Attention:

Project Name :

Lab No. :

Date: 1/12/2014

Phone: [redacted]
Fax:

Matrix: Water

Qty	Item	Item Amount	Item Total
11	VOC, 8260B	$125.00	$1,375.00
11	TPH - Gasoline, 8015M	$50.00	$550.00
1	EDF	$192.50	$192.50

Total Balance Due: $2,117.50

Invoice Submitted to the State is $2,117.50;

Which is $1,117.50 More Than Cal Tech's Books

INSTRUMENT CONDITION

Dust Bunnies and Possible Dead Insect Near the Injection Port

OUTCOME OF THE CASE

- **Criminal Prosecution**
  - Three Years Probation + Community Service
  - $190K Restitution
  - Debarred By EPA (Pending)
- **Spawned A Number Of Investigations Into Consultants**
  - Administrative Fraud Settlement (Including Disqualification From Cleanup Fund Work)
  - Penalty Of $90K

ENFORCEMENT IS A CRITICAL ELEMENT OF THE REGULATORY CRAFT

- Combatting Inappropriate Laboratory Practices
- Improving Regulatory Agency Confidence in ELAP Laboratories
- Boosts Voluntary Compliance

QUESTIONS