

LABORATORY DATA CONSULTANTS, INC.

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August 6, 2008

ERM 2525 Natomas Park Drive, Suite 350 Sacramento, CA 95833 ATTN: Ms. Maria Barajas-Albalawi

SUBJECT: BRC Tronox Parcel F, Data Validation

Dear Ms. Barajas-Albalawi

Enclosed are the final validation reports for the fractions listed below. These SDGs were received on July 14, 2008. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 19099:

SDG # Fraction

 F8F050256, Volatiles, Semivolatiles, Chlorinated Pesticides, Polychlorinated
 F8F110173 Biphenyls, Metals, Wet Chemistry, Gasoline Range Organics, Diesel Range Organics, Polynuclear Aromatic Hydrocarbons, Dioxins/Dibenzofurans

The data validation was performed under EPA Level III and Level IV guidelines. The analyses were validated using the following documents, as applicable to each method:

- USEPA, Contract Laboratory Program National Functional Guidelines for Organic Data Review, October 1999
- USEPA, Contract Laboratory Program National Functional Guidelines for Inorganic Data Review, October 2004
- EPA SW 846, Third Edition, Test Methods for Evaluating Solid Waste, update 1, July 1992; update IIA, August 1993; update II, September 1994; update IIB, January 1995; update III, December 1996; update IIIA, April 1998; IIIB, November 2004; Update IV, February 2007

Please feel free to contact us if you have any questions.

Sincerely,

Erlinda T. Rauto Operations Manager/Senior Chemist

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LDC Report# 19099A1

Laboratory Data Consultants, Inc. Data Validation Report

- Project/Site Name: BRC Tronox Parcel F
- Collection Date: June 4, 2008

LDC Report Date: July 24, 2008

Matrix: Soil/Water

Parameters: Volatiles

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0' TSB-FJ-06-2-0'MS TSB-FJ-06-2-0'MSD TB-2

Introduction

This data review covers 5 soil samples and one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8260B for Volatiles.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

The chain-of-custodies were reviewed for documentation of cooler temperatures. All cooler temperatures met validation criteria.

II. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

Percent relative standard deviations (%RSD) were less than or equal to 15.0% for each individual compound and less than or equal to 30.0% for calibration check compounds (CCCs).

In the case where %RSD was greater than 15.0%, the laboratory used a calibration curve to evaluate the compound. All coefficients of determination (r^2) were greater than or equal to 0.990.

For the purposes of technical evaluation, all compounds were evaluated against the 30.0% (%RSD) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria.

Average relative response factors (RRF) for all volatile target compounds and system performance check compounds (SPCCs) were within method and validation criteria with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
5/28/08 (MICAL)	Acetonitrile 2-Butanone	0.00984 (≥0.05) 0.03111 (≥0.05)	All water samples in SDG F8F050256	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A
5/21/08 (GICALBRC)	Ethanol	0.00086 (≥0.05)	All soil samples in SDG F8F050256	J (all detects) UJ (all non-detects)	A
5/28/08 (MICALBRC)	Ethanol	0.00361 (≥0.05)	All water samples in SDG F8F050256	J (all detects) UJ (all non-detects)	A

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

Percent differences (%D) between the initial calibration RRF and the continuing calibration RRF were within the method criteria of less than or equal to 20.0% for calibration check compounds (CCCs).

For the purposes of technical evaluation, all compounds were evaluated against the 25.0% (%D) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria with the following exceptions:

Date	Compound	%D	Associated Samples	Flag	A or P
6/9/08	Acetonitrile	25.93241	All soil samples in SDG F8F050256	J+ (all detects)	A
6/10/08	Dichlorodifluoromethane Bromomethane	25.94405 33.13188	All water samples in SDG F8F050256	J+ (all detects) J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 25.0% for all compounds with the following exceptions:

Date	Compound	%D	Associated Samples	Flag	A or P
5/23/08 (GICV1884)	Dichlorodifluoromethane Tetrachloroethene Nonanal	49.46918 34.4080 74.79276	All soil samples in SDG F8F050256	J+ (all detects) J+ (all detects) J+ (all detects)	A
5/28/08 (MICV7100)	lodomethane Nonanal	28.47470 40.60652	All water samples in SDG F8F050256	J+ (all detects) J+ (all detects)	A

All of the continuing calibration RRF values were within method and validation criteria with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/9/08	Ethanol	0.00079 (≥0.05)	All soil samples in SDG F8F050256	J (all detects) UJ (all non-detects)	А
6/10/08	Acetonitrile 2-Butanone	0.00933 (≥0.05) 0.02516 (≥0.05)	All water samples in SDG F8F050256	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A

V. Blanks

Method blanks were reviewed for each matrix as applicable. No volatile contaminants were found in the method blanks with the following exceptions:

Method Blank ID	Analysis Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
F8F09000-367	6/9/08	Dichloromethane	1.1 ug/Kg	All soil samples in SDG F8F050256

Sample concentrations were compared to concentrations detected in the method blanks. The sample concentrations were either not detected or were significantly greater (>10X for common contaminants, >5X for other contaminants) than the concentrations found in the associated method blanks with the following exceptions:

Sample	Compound	Reported	Modified Final
	TIC (RT in minutes)	Concentration	Concentration
TSB-FJ-06-2-0'	Dichloromethane	11 ug/Kg	11U ug/Kg

Samples TB-2 and TB-4 (from SDG F8F050256) were identified as trip blanks. No volatile contaminants were found in these blanks with the following exceptions:

Trip Blank ID	Sampling Date	Compound	Concentration	Associated Samples
TB-2	6/4/08	Dichloromethane Chloroform	0.23 ug/L 0.12 ug/L	TSB-FR-02-02-0' TSB-FJ-02-02-0'
TB-4	6/4/08	Dichloromethane Acetone Chloroform	0.29 ug/L 0.85 ug/L 0.11 ug/L	TSB-FJ-06-2-0'

Sample concentrations were compared to concentrations detected in the field blanks. The sample concentrations were either not detected or were significantly greater (>10X for common contaminants, >5X for other contaminants) than the concentrations found in the associated field blanks with the following exceptions:

Sample	Compound	Reported Concentration	Modified Final Concentration
TSB-FR-02-02-0'	Chloroform	0.53 ug/L	5.1U ug/L

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. All surrogate recoveries (%R) were within QC limits with the following exceptions:

Sample	Surrogate	%R (Limits)	Compound	Flag	A or P
F8F160000-097	Bromofluorobenzene	124 (79-115)	All TCL compounds	J+ (all detects)	Ρ
ТВ-2	Bromofluorobenzene	117 (66-115)	2-Hexanone	J (all detects)	А

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Although the MS/MSD percent recovery (%R) and relative percent differences (RPD) were not within QC limits for some compounds, the MS/MSD percent recoveries (%R) were within QC limits and no data were qualified.

VIII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. Although the percent recoveries for some compounds in the LCS were not within QC limits, the LCSD percent recoveries (%R) were within QC limits and no data were qualified.

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

All internal standard areas and retention times were within QC limits.

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Compound Quantitation and CRQLs

Raw data were not reviewed for this SDG.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment of Data

Data flags have been summarized at the end of the report if data has been qualified.

XVI. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel F Volatiles - Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Flag	A or P	Reason
F8F050256	TB-2	Acetonitrile 2-Butanone	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A	Initial calibration (RRF)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0' TB-2	Ethanol	J (all detects) UJ (all non-detects)	A	Initial calibration (RRF)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Acetonitrile	J+ (all detects)	A	Continuing calibration (%D)
F8F050256	ТВ-2	Dichlorodifluoromethane Bromomethane	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Dichlorodifluoromethane Tetrachloroethene Nonanal	J+ (all detects) J+ (all detects) J+ (all detects)	A	Continuing calibration (ICV %D)
F8F050256	ТВ-2	Iodomethane Nonanal	J+ (all detects) J+ (all detects)	A	Continuing calibration (ICV %D)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Ethanol	J (all detects) UJ (all non-detects)	A	Continuing calibration (RRF)
F8F050256	ТВ-2	Acetonitrile 2-Butanone	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A	Continuing calibration (RRF)
F8F050256	ТВ-2	2-Hexanone	J (all detects)	A	Surrogate recovery (%R)

BRC Tronox Parcel F Volatiles - Laboratory Blank Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P
F8F050256	TSB-FJ-06-2-0'	Dichloromethane	11U ug/Kg	A

BRC Tronox Parcel F Volatiles - Field Blank Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Modified Final Concentration	A or P
F8F050256	TSB-FR-02-02-0'	Chloroform	5.1U ug/L	A

LDC #: <u>19099A1</u>	VALIDATION COMPLETENESS WORKSHEET	Date: 7/20/08
SDG #:	Level III	Page:_/_of
Laboratory: Test America	-	Reviewer: <u>P7</u>
		2nd Reviewer: $^{\prime}^{\prime}^{\prime}$
METHOD: GC/MS Volatiles (E	PA SW 846 Method 8260B)	/

METHOD: GC/MS Volatiles (EPA SW 846 Method 8260B)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

	Validation Area		Comments
١.	Technical holding times	Д	Sampling dates: 6/4/68
II.	GC/MS Instrument performance check	Δ	
- 111.	Initial calibration	SW	9. psD, (* Zo. 990
IV.	Continuing calibration/ICV	SW	111 525
V.	Blanks	SW	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	SW	Les ID
IX.	Regional Quality Assurance and Quality Control	N	
Х.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	N	
XVII.	Field blanks	ردس	TB = 4 $TB = TB - 4 sDG #$

Note:

A = Acceptable N = Not provided/applicable SW = See worksheet ND = No compounds detected R = Rinsate FB = Field blank

D = Duplicate TB = Trip blank EB = Equipment blank F8F05034

Validated Samples:

SOIL + Water

1 1	TSB-FR-02-02-0'	17	F8 F09 0000-367	21	8141367	31	
2+1	TSB-FJ-02-02-0'	12	F8/=130000 -280	22	8165280	32	
<u> </u>	TSB-FJ-06-2-0'	13	F8 F16000-097	23	8168097	33	
4	TSB-FJ-06-2-0'MS	14		24		34	
5	TSB-FJ-06-2-0'MSD	, 15		25		35	
<u>6</u> 2	78-2 W	16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

TARGET COMPOUND WORKSHEET

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* = System performance check compounds (SPCC) for RRF ; ** = Calibration check compounds (CCC) for %RSD.

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VALIDATION FINDINGS WORKSHEET **Initial Calibration**

Page: / of / Ø Reviewer:___ 2nd Reviewer:_

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". <u>X N N/A</u> Did the laboratory perform a 5 point calibration prior to sample analysis?

Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's? Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation? N N/A N N/A

\circ Date Standard ID Compound Finding WSD Finding ReF Associated Samples Qualifications \circ P_{M} M CM E_{T} C_{COPDUN} E_{T} C_{COPDUN} M_{12}	_				 	* ***		 _	 · · · ·		 	 	 	 	 		 	-
* Date Standard ID Compound Finding RF Associated Samples 5 Pay Pob /// T CAL EEEE 0.023/1/ Part 13005 Associated Samples 5 Pay Pob /// T CAL EEEE 0.023/1/ Part 13005 And Larder 5 Pay Pob // T CAL M 0.023/1/ And Larder And Larder 5 Pay Pob // T CAL M 0.023/1/ And Larder And Larder 5 Pay Pob // T CAL BRC Luuuu 0.02026 Far F J 3000-300 And Larder 5 Pay Pob // And CAL BRC Luuuu 0.00036 Far F J 3000-300 And V		Qualifications	J/43/A	Z		J/4J/A			J/4J/A									
* Date Standard ID Compound Finding %850 Finding R850 $5 p y f g B$ M ICAL $E \overline{E} \overline{E}$ $G = 0.03 y$ $G = 0.03 y$ $5 p y f g B$ M ICAL M $G = 0.03 y$ $G = 0.023 y$ $5 p y f g B$ M ICAL $U U U U$ $G = 0.023 y$ $5 p y f g B$ M ICAL $U U U U$ $G = 0.023 c$ $5 p y f g B$ M ICAL B RC $U U U U$ $G = 0.023 c$		Associated Samples	F 8F13000-200	All wafer		F8 F090000-367	All Soi/S		F8F13000-20	+ Allwaler								
# Date Standard ID Compound Finding %RSD $5 p Y b B$ $M T CAL$ $E \overline{E} \overline{E} \overline{E}$ (Limit: <20.0%)	RSD and ≥0.05 RRF ?	Finding RRF (Limit: >0.05)	0.00984	0.03/1/		0.000%6			0.0036/									
* Date Standard ID Compound 5/2/bB MICAL EEEE 5/2/bB MICAL EEEE 5/2/bB MICAL BRC WWW 5/2/bB MICAL BRC WWW	tion criteria of ≤30 %	Finding %RSD (Limit: ≤30.0%)																
# Date Standard ID 5/bY/bB MICAL 5/b1/0Y GICALBRC 5/b1/0Y MICALBRC	KES within the validat	Compound	EEEE	W		nnn			322									
# Date 5/22/08	Vere all %RSDs and R	Standard ID	MICAL			GIGALBRC			MICAL BRC									
		# Date	5/28/08	/ .		5/21/08			5/24/DK		 							

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VALIDATION FINDINGS WORKSHEET **Continuing Calibration**

∫of 2nd Reviewer:__ Page: Reviewer:

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

Rlease see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

YN N/A

Was a continuing calibration standard analyzed at least once every 12 hours for each instrument? Were percent differences (%D) and relative response factors (RRF) within method criteria for all CCC's and SPCC's ?

汇	N N/A V	Vere all %D and RRFs	within the validation cri	iteria of ≤25 %D and Eindiac %D	1 >0.05 RRF ?			
#	Date	Standard ID	Compound	rmamg %∪ (Limit: ≤25.0%)	Limit: <u>>0.05)</u>	Associated Samples	Qualifications	
+	5/25/08	GICV1844	77	49.46918		PX F09000-367	J*/Add	
+			44	34.4080		+411201/2	1	
+			Konana/	74.79276		7	1	
+	5/2/0X	MICV7100	Todome thank	01474. Sr		PX 1-13 UUDO-340,	Jt/Adut	
*			Nonana/	40.60652		+All water		
*	P 19/0X	GCAL1940	EEEE	1/256 .22		F& F090000-361	Jr/Adet	
						× A // Soi'/S		
						1		
	6/9/08	GCAL1941BRC	www		0.00079	ſ	JUJ /A	
	•							
7	6/10/08	MCAL 72 69	77	sappe.se		F 8/ + / 30000- 240	Jt/Adit	
*			Ø	33.61.66		+ All water	7	
			EEEE		0.00733		JUJ /A	
			Z		915200	\uparrow	$\frac{T}{T}$	

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VALIDATION FINDINGS WORKSHEET <u>Blanks</u>

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METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". \underline{MN} N/A Was a method blank associated with every sample in this SDG?

Was a method blank analyzed at least once every 12 hours for each matrix and concentration? Was there contamination in the method blanks? If yes, please see the qualifications below. 60 Ø N N/A N N/A

Cone units: Marka Blank analysis date:

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Compound	Blank ID				S.	Imple Identifica	tion		
	ESECTOO		6						
Methylene chloride	1.1		11/11						
A cetono,			,						
CRaL									
TICs:									
Hexamethyl-cyclotrisiloxane									
Octamethyl-cyclotetrasiloxane									
	-								
						-			
•									
								· · ·	
							1		
All results were gualified using the	s criteria stated h	claw account the							

Note: Common contaminants such as Methylene chloride, Acetone, 2-Butanone, Carbon disulfide and TICs that were detected in samples within ten times the associated method blank concentration were qualified as not detected, "U". Other contaminants within five times the method blank concentration were also qualified as not detected, "U".

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1 1 2 3 1	

Field Blanks

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AETHOD: GC/MS VOA (EPA SW 846 Method 8260B) <u>Y N /NA</u> Were field blanks identified in this SDG? <u>Y N NA</u> Were target compounds detected in the field blanks? <u>Y N NA</u> Were target compounds detected in the field blanks? <u>Y N NA</u> Were target compounds detected in the field blanks? <u>Y N NA</u> Were target compounds detected in the field blanks? <u>Y N NA</u> Mere target compounds detected in the field blanks?
Inter plaint () bot (of cio of a) 1 100 plaint / 17/100 plaint / Offici .

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ield blank type. (circle one)	Field Blank	/ Rinsate / Trij	p Blank / Other:	Ţ₿	Associated Samples		L		ĺ
Compound	Blank ID 6	Blank ID			Sample Ider	ntification			
	80/1/9								
Dich/DrD me Hand Methytene chloride	5.23		(
Acetone									
Chloroform	e/.0		D.53/544						
			•						
CRQL									
Blank units: <u>v9/L</u> Asso	ciated samp	ole units: 🛷	5/2			n	640	1	/

7 / X)									
Y D Y									
m									
		fication							
	o samples:	Sample Identi							
	Associate						 		
n-al- 0.	1 ai - a						 		
L	K / Otner: /								
217	rip bian							 	
e units: «	Kinsate / I	Blank ID							
iated sample	Field Blank /	Blank ID []	6/4/08	0-29	0.85	0.1/			
L Assoc	circie one)		the second way	Hane					
inits: 22/	iank type: (Compound		h/orome, nechloride	~	E			
Slank (a piei-			Wethyte	Acetone	Chloroft			cral

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT: Common contaminants such as Methylene chloride, Acetone, 2-Butanone and Carbon disulfide that were detected in samples within ten times the associated field blank concentration were qualified as not detected, "U". Other contaminants within five times the times the associated field blank concentration were qualified as not

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VALIDATION FINDINGS WORKSHEET Surrogate Spikes

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METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

Please)see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

Were all surrogate %R within QC limits? X/N/N/X

If the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R out of outside Y/N N/Y

	Qualifications	Jt/Pdet		1+/Adet QUAL Zonly	P																		
	(Limits)	(5/1-22)	()	(5//-99)	()	()	()	()) (()) (()	(()	()	()	()	()	()	()) (
	%Recovery	124		LII										-								<u>) Limits (Water)</u> 88-110 86-115 80-120	86-118
	Surrogate	BFB		BFB																		0	
	ple ID	2000-002																				<u>OC Limits (Soil)</u> 81-117 74-121 80-120	90-120
riteria <i>:</i>	Sam	FSF/6		9																		ne-d8 offuorobenzene ichloroethane-d4	motiuorometnane
010	Date																					(TOL) = Toluer (BFB) = Brome (DCE) = 1,2-D	(UFM) = UIDIO
	#																					SMC1 SMC2 SMC3	SMC4

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Matrix Spike/Matrix Spike Duplicates VALIDATION FINDINGS WORKSHEET

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METHOD : GC/MS VOA (EPA SW 846 Method 8260B)

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". <u>V N N/A</u> Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.

1		6:0	0										Π					Ī					1		
	Qualifications	SW 7 4 MO OU	'sm /	1:0/sw/	1 1															RPD (Water)	<u>_</u> 14%		A 11'		
) limits?	Associated Samples	/ #	/		7	•														QC Limits (Water)	61-145%	71-120%	76-127%	(de 1257)a	. 5-130%
the Q0) (((~	$\widehat{}$			($\widehat{}$) (^	<u> </u>	($\widehat{}$	(
s (RPD) within	RPD (Limits)))	24 (20	48 (20)	~	_)))	~)))	~)))	RPD (Soll)	≤ 22%	≤ 24%	2.21%	2. 24 eV	21.6
ference)	(25	0'	<u> </u>	<u> </u>	$\widehat{}$		^	(<u> </u>	^		- -		$\widehat{}$	<u> </u>	<u> </u>	(
ix? ive percent diff	MSD %R (Limits))	1-18 151)))))	<u> </u>))	~	>	})	· · ·)))	s (Soil)	12%	- H.A.4		-1	- The second
nples of each matr (%R) and the relat	MS %R (Limits)	(as1-0e) 2:		()	()	()		()		()	()	()	()	()	(()	()	() ·	()	ac timi	1-95				
zed every 20 sar rcent recoveries	Compound	d J		EEEE	HH															pund					
Was a MS/MSD analy: Were the MS/MSD pe	ai asm/sm	4 a S																		Compo	1,1-Dichloroethene	Trichloroethene	Benzene	Toluene	Chlorobenzene
N/A N/A	Date																				Ĩ	ல்	V.	cc.	DC
ZZ) XX	*																								

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VALIDATION FINDINGS WORNSHEET Laboratory Control Samples (LCS)

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METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

A/A A

Was a LCS required? Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?

		0.1						······································																	
	Qualifications	no ount Le	>																						
	Associated Samples	P8 F/30005-36	7																						
· ·	RPD (Limits)	()	- (,	((()	(· · ·	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()
	«R (Limits)	()	(()	()	(()		()		()	()	()	()	()	()	()	()	()	()	()	()	()	()
	%R (Limits)	11-82) oci	hal-h2, sel	()	((()	((()	(()	()	()	(()		()	()	()	()	()	(
	Compound	N	ф																						
	rcs/rcsp ID	Q165380-102 10																							
	Date																								
	#							L											<u> </u>						

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LDC Report# 19099A2

Laboratory Data Consultants, Inc. Data Validation Report

- Project/Site Name: BRC Tronox Parcel F
- Collection Date: June 4, 2008

LDC Report Date: July 24, 2008

Matrix: Soil

Parameters: Semivolatiles

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'

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Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

The chain-of-custodies were reviewed for documentation of cooler temperatures. All cooler temperatures met validation criteria.

II. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

Percent relative standard deviations (%RSD) were less than or equal to 15.0% for each individual compound and less than or equal to 30.0% for calibration check compounds (CCCs).

In the case where %RSD was greater than 15.0%, the laboratory used a calibration curve to evaluate the compound. All coefficients of determination (r^2) were greater than or equal to 0.990.

For the purposes of technical evaluation, all compounds were evaluated against the 30.0% (%RSD) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria.

Average relative response factors (RRF) for all semivolatile target compounds and system performance check compounds (SPCCs) were greater than or equal to 0.05 as required with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/4/08	Phthalic acid	0.02848 (≥0.05)	All samples in SDG F8F050256	J (all detects) UJ (all non-detects)	A

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

Percent differences (%D) between the initial calibration RRF and the continuing calibration RRF were within the method criteria of less than or equal to 20.0% for calibration check compounds (CCCs).

For the purposes of technical evaluation, all compounds were evaluated against the 25.0% (%D) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria with the following exceptions:

Date	Compound	%D	Associated Samples	Flag	A or P
6/12/08	Phthalic acid	58.34506	All samples in SDG F8F050256	J- (all detects) UJ (all non-detects)	А
	n-(Hydroxymethyl)phthalimide	46.18722		J- (all detects) UJ (all non-detects)	

The percent difference (%D) of the second source calibration standard were less than or equal to 25.0% for all compounds.

All of the continuing calibration RRF values were within method and validation criteria with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/12/08	Phthalic acid	0.01186 (≥0.05)	All samples in SDG F8F050256	J (all detects) UJ (all non-detects)	A

V. Blanks

Method blanks were reviewed for each matrix as applicable. No semivolatile contaminants were found in the method blanks.

Sample "RINSATE 1" (from SDG F8F050256) was identified as a rinsate. No semivolatile contaminants were found in this blank.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. All surrogate recoveries (%R) were within QC limits.

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

VIII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) were within QC limits.

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

All internal standard areas and retention times were within QC limits with the following exceptions:

Sample	Internal Standards	Area (Limits)	Compound	Flag	A or P
TSB-FR-02-02-0'	Perylene-d12	83220 (270174-1080696)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	Ρ

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Compound Quantitation and CRQLs

Raw data were not reviewed for this SDG.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment of Data

Data flags have been summarized at the end of the report if data has been qualified.

XVI. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel F Semivolatiles - Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Flag	A or P	Reason
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Phthalic acid	J (all detects) UJ (all non-detects)	A	Initial calibration (RRF)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Phthalic acid n-(Hydroxymethyl)phthalimide	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Phthalic acid	J (all detects) UJ (all non-detects)	A	Continuing calibration (RRF)
F8F050256	TSB-FR-02-02-0'	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	Р	Internal standards (area)

BRC Tronox Parcel F Semivolatiles - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel F Semivolatiles - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

VALIDATION GOWFLETENESS WORKSHEET

LDC #: <u>19099A2</u> SDG #: <u>F8F050256</u> Laboratory: <u>Test America</u>

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METHOD: GC/MS Semivolatiles (EPA SW 846 Method 8270C)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

	Validation Area		Comments
Ι.	Technical holding times	Α	Sampling dates: 6/4/08
	GC/MS Instrument performance check	A	
111.	Initial calibration	SW	1/2 psp. 12 Zo.990
IV.	Continuing calibration/ICV	SW	1
V.	Blanks	A	
VI.	Surrogate spikes	Δ	
VII.	Matrix spike/Matrix spike duplicates	SW	TRX-HR-OY-O'MD
VIII.	Laboratory control samples	A	LCS
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	SW	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	N	
XVII.	Field blanks	ND	R= Rinsate / SDG # F8F05025

Note:

A = Acceptable N = Not provided/applicable

SW = See worksheet

ND = No compounds detected R = Rinsate FB = Field blank D = Duplicate TB = Trip blank EB = Equipment blank

Validated Samples: Soll

1+	TSB-FR-02-02-0'	11	F8 F0 60000-173	21	8158173	31	
2	TSB-FJ-02-02-0'	12		22		32	
3	TSB-FJ-06-2-0'	13		23		33	
4		14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

VALIDATION FINDINGS WORKSHEET

METHOD: GC/MS BNA (EPA SW 846 Method 8270C)

P RY

A. Phenol**	P. Bis(2-chloroethoxy)methane	EE. 2,6-Dinitrotoluene	TT, Pentachlorophenol**	III. Benzo(a)pyrene**
B. Bis (2-chloroethyl) ether	Q. 2,4-Dichlorophenol**	FF. 3-Nitroaniline	UU. Phenanthrene	JJJ. Indeno(1,2,3-cd)pyrene
C. 2-Chlorophenol	R. 1,2,4-Trichlorobenzene	GG. Acenaphthene**	VV. Anthracene	KKK. Dibenz(a,h)anthracene
D. 1,3-Dichlorobenzene	S. Naphthalene	HH. 2,4-Dinitrophenol*	WW. Carbazole	LLL. Benzo(g,ħ,i)perylene
E. 1,4-Dichlorobenzene**	T. 4-Chloroaniline	ll. 4-Nitrophenol*	XX. Di-n-butylphthalate	MMM. Bis(2-Chloroisopropyl)ether
F. 1,2-Dichlorobenzene	U. Hexachlorobutadiene**	JJ. Dibenzofuran	YY. Fluoranthene**	NNN. Aniline
G. 2-Methylphenol	V. 4-Chioro-3-methylphenoi**	KK. 2,4-Dinitrotoluene	ZZ. Pyrene	000. N-Nitrosodimethylamine
H. 2,2'-Oxybis(1-chloropropane)	W. 2-Methylnaphthalene	LL. Diethylphthalate	AAA. Butylbenzylphthalate	PPP. Benzoic Acid
l. 4-Methylphenol	X. Hexachiorocyclopentadiene*	MM. 4-Chlorophenyl-phenyl ether	BBB. 3,3'-Dichíorobenzidine	QQQ. Benzyl alcohol
J. N-Nitroso-di-n-propylamine*	Y. 2,4,6-Trichlorophenol**	NN. Fluorene	CCC. Benzo(a)anthracene	RRR. Pyridine
K. Hexachloroethane	Z. 2,4,5-Trichlorophenol	00. 4-Nitroaniline	DDD. Chrysene	SSS. Benzidine
L. Nitrobenzene	AA. 2-Chloronaphthalene	PP. 4,6-Dinitro-2-methylphenol	EEE. Bis(2-ethylhexyl)phthalate	ТТТ.
M. Isophorone	BB. 2-Nitroaniline	QQ. N-Nitrosodiphenylamine (1)**	FFF. Di-n-octylphthalate**	nnu
N. 2-Nitrophenol**	CC. Dimethylphthalate	RR. 4-Bromophenyl-phenylether	GGG. Benzo(b)fluoranthene	vvv.
O. 2,4-Dimethylphenol	DD. Acenaphthylene	SS. Hexachlorobenzene	HHH. Benzo(k)fluoranthene	www.

Notes: * = System performance check compound (SPCC) for RRF; ** = Calibration check compound (CCC) for %RSD.

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VALIDATION FINDINGS WORKSHEET **Initial Calibration**



Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A" METHOD; GC/MS BNA (EPA SW 846 Method 8270)

Did the laboratory conduct an acceptable 5 point calibration prior to sample analysis? V N N/A

Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's? ΥNN/A

	Qualifications	1/41/A															
	Associated Samples	A// + B/K															t
nd ≥0.05 RRF ?	Finding RRF (Limit: ≥0.05)	8620.0													•		
lteria? ⊳riteria of ≤30 %RSD a	Finding %RSD (Limit: <u>≤</u> 30.0%)	<i> </i>													•	,	
neet the acceptance cr s within the validation	Compound	Phthalic Au															
Did the initial calibration n Vere all %RSDs and RRF	Standard ID	KICAL SPEC															
	Date	14/08	,								 						
ジ	/ *																

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VALIDATION FINDINGS WORKSHEET **Continuing Calibration**

1 Page: / of / Reviewer:

METHOD: GC/MS-YOA (EPA SW 846 Method $\frac{g}{2200}$ B) Method: GC/MS-YOA (EPA SW 846 Method $\frac{g}{2200}$ B) Method: GC/MS-YOA (EPA SW 846 Method $\frac{g}{2200}$ B)

			<u> </u>	.		 	 1	 	 	 	 	 		 	_	 	r
Qualifications	J/m/A	1-14) A															
Associated Samples	A 11 + B11-		7														
Finding RRF (Limit: <u>></u> 0.05)	0.01186																
Finding %D (Limit: <25.0%)		70545.85	1) 46. 18722														
Compound	Phthalic Acid	1	N-(Hydroxymethy)-N	ph thallimid	/												
Standard ID	KCAL5872																
Date	6/12/08					 	 	 						 			
) #		1															

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Matrix Spike/Matrix Spike Duplicates VALIDATION FINDINGS WORKSHEET

5 Page: 2nd Reviewer: Reviewer:

METHOD: GC/MS BNA (EPA SW 846 Method 8270)

Prease see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water. Y/N N/Y

hin the QC limits?	ts) Associated Samples Qualifications	30) mo 10 20172							(((
Was a MS/MSD analyzed every 20 samples of each matrix? Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) withir	RPD (Limits	321 3)	-) -	~	-)	~)	-	-))	~	-	-	
	MSD %R (Limits)	17 (43-104)	()	()	(')	((()	()	(()	()	()	()	()	()	()	()	
	MS %R (Limits)	23 (45-104)	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	
	Compound	A44																	
	di dsw/sw	TRX-HA-04-0'	QI SW																- - -
Y N N/A	# Date																		

< 38% RPD (Water) ≤ 31% ≤ 50% <u><</u> 31% <u>< 50%</u> QC Limits (Water) 26-127% 46-118% 10-80% 24-96% 9-103% ≤ 19% < 50% ≤ 47% 36% ≤ 47% RPD (Soll) QC Limits (Soil) 31-137% 11-114% 17-109% 35-142% 28-89% Pentachlorophenol 2,4-Dinitrotoluene Compound Acenaphthene 4-Nitrophenol Pyrene GG. 홋 Ë Ľ = RPD (Water) < 42% ▲ 40% ≤ 38% ≤ 42% __ 28% ≤ 28% QC Limits (Water) 12-110% 27-123% 36-97% 39-98% 23-97% 41-116% %8 ≥ < 33% ≤ 50% <u>< 38%</u> < 35% ≤ 27% RPD (Soll) QC Limits (Soil) 25-102% 41-126% 38-107% 26-90% 26-103% 28-104% N-Nitroso-di-n-propylamine 4-Chloro-3-methylphenol 1,2,4-Trichlorobenzene Compound 1,4-Dichlorobenzene 2-Chlorophenol Phenol ÷ ö æ > Ż ய்

MSD.2S

	oner		IDATION FINDINGS WORKS. Internal Standards	SHEET	Page: of C
METHOD: GC/M Please see qualit <u>X N N/A</u> V	S BNA (EPA SW 846 M fications below for all qu Vere all internal standar Vere the retention time	Aethod 8270) uestions answered "N". rd area counts within -5 s of the internal standar	Not applicable questions are identif 0 to +100 of the associated calibra ds within +/- 30 seconds of the ret	fifed as "N/A". ation standard? tention times of the associated calit	2nd Reviewer:
# Date	Sample ID	Internal Standard	Area (Limits)	RT (Limits)	Qualifications
		REP PRY	82220/270174-108	(1694)	J/m/ / P and
		<u> </u>			
* QC limits are advis IS1 (DCB) = 1 4.Dic	sory hlorohanzana-d4	154 (PHN) = Phenetitrane	Q		
IS2 (NPT) = Naphth IS2 (NPT) = Naphth IS3 (ANT) = Acenap	alene-d8 htthene-d10	125 (CRY) = Chrysene-d12 126 (PRY) = Perylene-d12	2		

INTST.2S

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Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Mame: DRC HUNDX Faicer	Proj	ject/Site	Name:	BRC Tronox	Parcel F
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Soil

Collection Date: June 4, 2008

LDC Report Date: July 24, 2008

Matrix:

Parameters: Chlorinated Pesticides

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-FR-02-02-0' TSB-FR-02-02-0'DL TSB-FJ-02-02-0' TSB-FJ-02-02-0'DL TSB-FJ-06-2-0' TSB-FJ-06-2-0'DL

Introduction

This data review covers 6 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8081A for Chlorinated Pesticides.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

The chain-of-custodies were reviewed for documentation of cooler temperatures. All cooler temperatures met validation criteria.

II. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single and multicomponent compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

The percent relative standard deviations (%RSD) were less than or equal to 20.0% for all compounds.

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 15.0% QC limits with the following exceptions:

Date	Standard	Channel	Compound	%D	Associated Samples	Flag	A or P
6/13/08	KCAL892	A	gamma-BHC Endosulfan I Dieldrin 4,4'-DDD Endosulfan II Methoxychlor Endosulfan sulfate Endrin ketone	15.4 15.6 15.7 16.9 16.2 15.1 17.1 16.4	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0' F8F060000-174	J+ (all detects) J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

The individual 4,4'-DDT and Endrin breakdowns (%BD) were less than or equal to 15.0%.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No chlorinated pesticide contaminants were found in the method blanks.

Sample "RINSATE 1" (from SDG F8F050256) was identified as a rinsate. No chlorinated pesticide contaminants were found in this blank.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. All surrogate recoveries (%R) were within QC limits with the following exceptions:

Sample	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
TSB-FJ-06-2-0'	Not specified	Decachlorobiphenyl	160 (63-117)	All TCL compounds	J+ (all detects)	A

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

VIII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) were within QC limits.

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Pesticide Cleanup Checks

a. Florisil Cartridge Check

Florisil cleanup was not required and therefore not performed in this SDG.

b. GPC Calibration

GPC cleanup was not required and therefore not performed in this SDG.

XI. Target Compound Identification

Raw data were not reviewed for this SDG.

XII. Compound Quantitation and Reported CRQLs

All compound quantitation and CRQLs were within validation criteria with the following exceptions:
Sample	Compound	Finding	Criteria	Flag	A or P
TSB-FR-02-02-0'	4,4'-DDT	Sample result exceeded calibration range.	Reported result should be within calibration range.	J (all detects)	A
TSB-FJ-06-2-0'	beta-BHC	Sample result exceeded calibration range.	Reported result should be within calibration range.	J (all detects)	A
TSB-FJ-02-02-0'	beta-BHC 4,4'-DDE	Sample result exceeded calibration range.	Reported result should be within calibration range.	J (all detects) J (all detects)	A

The sample results for detected compounds from the two columns were within 40% difference with the following exceptions:

Sample	Compound	%D	Flag	A or P
TSB-FR-02-02-0'	2,4'-DDE	81.7	J (all detects)	A
TSB-FJ-06-2-0'	4,4'-DDT	218.5	J (all detects)	А

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

Data flags are summarized at the end of this report if data has been qualified.

XIV. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel F Chlorinated Pesticides - Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Flag	A or P	Reason
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	gamma-BHC Endosulfan I Dieldrin 4,4'-DDD Endosulfan II Methoxychlor Endosulfan sulfate Endrin ketone	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D)
F8F050256	TSB-FJ-06-2-0'	All TCL compounds	J+ (all detects)	A	Surrogate recovery (%R)
F8F050256	TSB-FR-02-02-0'	4,4'-DDT	J (all detects)	A	Compound quantitation and CRQLs
F8F050256	TSB-FJ-06-2-0'	beta-BHC	J (all detects)	A	Compound quantitation and CRQLs
F8F050256	TSB-FJ-02-02-0'	beta-BHC 4,4'-DDE	J (all detects) J (all detects)	A	Compound quantitation and CRQLs
F8F050256	TSB-FR-02-02-0'	2,4'-DDE	J (all detects)	A	Compound quantitation and CRQLs (%D)
F8F050256	TSB-FJ-06-2-0'	4,4'-DDT	J (all detects)	A	Compound quantitation and CRQLs (%D)

BRC Tronox Parcel F

Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel F Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

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LDC #: <u>19099A3a</u> SDG #: <u>F8F050256</u> Laboratory: Test America

Level III

Date: 7/2//08 Page: / of // viewer: 772 Reviewer: 2nd Reviewer

METHOD: GC Chlorinated Pesticides (EPA SW 846 Method 8081A)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

	Validation Area		Comments
1.	Technical holding times	4	Sampling dates: 6/4/08
11.	GC/ECD Instrument Performance Check	Δ	
III.	Initial calibration	Δ	
IV.	Continuing calibration/ICV	Su	$10V \leq 15$
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	TRX-HR -04-0'
VIII.	Laboratory control samples	Ą	103
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	SW	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	N	
XV.	Field blanks	ND	R= Rinsate / SDG # P8F050256

Note:

A = Acceptable N = Not provided/applicable SW = See worksheet ND = No compounds detected R = Rinsate FB = Field blank D = Duplicate TB = Trip blank EB = Equipment blank

Validated Samples:

	SOIL					
1	TSB-FR-02-02-0' 5#	11		21	31	
2	► TSB-FR-02-02-0'DL ,•¥	12		22	32	
3	TSB-FJ-02-02-0'	13		23	33	
4	₿ TSB-FJ-02-02-0'DL 10¥	14		24	34	
5	TSB-FJ-06-2-0' ' י	15		25	35	
6	B/ TSB-FJ-06-2-0'DL →	16		26	36	
7	F8F040000-174	17	8158174	27	37	
8		18	187'	28	38	
9		19		29	39	
10		20		30	40	

VALIDATION FINDINGS WORKSHEET

METHOD: Pesticide/PCBs (EPASW 846 Method 8081/8082)

			.00		Ŧ			<u> </u>		11.			XX.							NN.
		Y. Arocior-1242			4. Arocior-1248		AA. Aroclor-1254			BB. Arocior-1260		CC. DB 608					EE		LL LL	
	O. Endria harres			R. Endrin aldehyde		S. alpha-Chlordana			T. gamma-Chiordane		U. Toxaphena			V. Aroclor-1016		W. Arociar-1221		~	A. MUCIOF-1232	
	l. Dieldrin		J. 4,4'-DDE			R. Endrin		L. Endosulfan II			m. 4,4'-DDD		N. Endosulfan sulfate			0.4,4-001		P. Methoxychlor		
A sists miss		B. beta. BHC			C. delta-BHC		D. gamma-BHC			E. Heptachlor		E Aldria			G. Heptachlor epoxide		H. Endosulfan I			

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Notes:

	Qualifications	J+/Adet							\wedge													
A". idows?	Associated Samples	F8 F060000 -174	1, 3, 5						$\boldsymbol{\Lambda}$													
are identified as "N/ es? iteria of ≤15.0%? tive acceptance wir	RT (limit)) () (((()	(()	()		()	()	()	()	()	()	()	()	()	()
oplicable questions a D orRPD e required frequenci o / RPD validation cr s within their respec	%D / RPD (Limit < 15.0)	12-4	15.60	L:SV	16.9	16.2	1.51	1.7.1	16.4	~												
/ered "N". Not a arformed?% s analyzed at th ds meet the %D ated compound	Compound	Ο	Ø	z	W	7	d	N,	Ø													
questions answ lculation was pe ration standard ibration standar nes for all calibi	Detector/ Column	ch A																				
ifications below for all ntinuing calibration ca Were continuing calit Did the continuing ca Were the retention tir	Standard ID	ke41892																				
Please see qual What type of col Y N NIA V N NIA evel IX Only Y N NIA	# Date	c/13/08					_															

VALIDATION FINDINGS WORKSHEET Continuing Calibration

METHOD: CC HPLC

LDC # 19099732

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LDC #: 19099732

VALIDATION FINDINDS WORKSHEET Surrogate Recovery



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(%R) meet the QC limits?	Surrogate Compound %R (Limits) Qualifications	no y po (25-115) no greed	(b - b) = (b - (c -		/ x DO (21/55) DO X	P PO (63,17) 12	no greed							Surrogate Compound Surrogate Compound Surrogate Compound	Octacosane M Benzo(e)Pyrene S 1-Chloro-3-Nitrobenzene Y Tetrachloro-m- xylene	Ortho-Terphenyl N Terphenyl-D14 T 3,4-Dinitrotoluene	Fluorobenzene (FBZ) O Decachlorobiphenyl (DCB) U Tripentyltin	n-Triacontane P 1-methylnaohthalene V Tri-n-oroovitin	
%R) meet the QC limits?	Surrogate Compound			¢		,		\mathcal{I}						urrogate Compound	Octacosane M	Ortho-Terphenyl N	Fluorobenzene (FBZ) O De	n-Triacontane P	-
gate recoveries (°	Detector/ Column	not specific	/ /	ł	1		\checkmark							Nd S	 О	FB) H			-
A Did all surro	Sample ID	X W 1.2	1 1 /	بر ج	× 6		4							Surrogate Compour	Chlorobenzene (CB2)	4-Bromofluorobenzene (B.	a,a,a-Trifluorotoluene	Bromochlorobenene	
N N X	**														A	B	U		

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VALIDATION FINDINGS WORKSHEET Matrix Spike/Matrix Spike Duplicates



Was an MS/MSD analyzed every 20 samples for each matrix or whenever a sample extraction was performed? Mere the MS/MSD nercent recoveries (%P) and relative nercent differences (RPD) within OC limits? **METHOD:** $\sqrt{6}C$ **HPLC** Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". <u>Y N N/A</u> Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? X N-N/A

	Qualifications	n guel	/																							
0 III 11(5 {	Associated Samples	rur																								
	(Limits)	()	(()	()	()) (()	()	()	()		(()	()	()	()		()	()	()	()	()	()	()
Elerices (M	RPD (am d																								
percent unit	MSD : (Limits)	4 % RR.			()	()	(()	()	()	()	()	(()	()	()	()	()	())	()	()	()	()	()	(
nd relative	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	8%	i.																	(((((
ent recoveries (%K) a	MS %R (Limits)	I compound	outsi'elle au	()				()						~	~	-	~	~)	<i>、</i>)))))
MS/MSU perc	Compound	Lever																								
Vere the		TRX-HB-04-0	ms/n																							
)*																<u> </u>									

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LDC #	SDG #:

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Compound Quantitation and Reported CRQLs VALIDATION FINDINGS WORKSHEET

Page: 🖊 of 🗡 Reviewer:

METHOD:

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

Level JV/D-Only Y N/N/A Y N/N/A

Were CRQLs adjusted for sample dilutions, dry weight factors, etc.? Did the reported results for detected target compounds agree within 10.0% of the recalculated results?

* Compound Name Finding Associated Samples Qualifications \rightarrow \rightarrow $e \times ceeded$ $a \wedge y$ X V/A X B D Y X Y V/A X B D Y X Y/A A^{-1}/A^{-1} B D V/A X Y Y/A B D Y X Y/A Y/A A Y X Y Y/A Y/A A Y Y Y Y Y A Y Y Y				 	 		 	 	 	 	
# Compound Name Finding Associated Samples B exceeeded C Manage Manage B I Manage Manage Manage B I	Qualifications	1/A 27		1/4 dr		J /A det					
* Compound Name Finding B B exceeded call Range B J T	Associated Samples	1 8		کا کر		ŋ					
* Compound Name B B B B C B C <td< td=""><td>Finding</td><td>exceeded and hange</td><td>þ</td><td>*</td><td></td><td>^</td><td></td><td></td><td></td><td></td><td></td></td<>	Finding	exceeded and hange	þ	*		^					
*	Compound Name	Φ		В		B, J					
	#										

Comments: <u>See sample calculation verification worksheet for recalculations</u>

19099A32 205 20 LDC #: SDG #

Compound Quantitation and Reported CRQLs VALIDATION FINDINGS WORKSHEET

Page: / of / 2nd Reviewer: Reviewer:

GC____HPLC METHOD:

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". Level JX/D Only

Y N N/A

Were CRQLs adjusted for sample dilutions, dry weight factors, etc.? Did the reported results for detected target compounds agree within 10.0% of the recalculated results?

Qualifications	J/A det		+ / / /	1/11 000					
Associated Samples	/		ļ	0					
% D Bet. 2 co/ump Finding £ 40	81.7) 10 ⁻¹	2015					- DDF) was Hy 40%
Compound Name	300 - , h't		2	2					# 5 (4,4;
#									

Comments: See sample calculation verification worksheet for recalculations

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site	Name:	BRC Tronox Parcel F

Collection Date: June 4, 2008

LDC Report Date: July 24, 2008

Matrix:

Parameters: Polychlorinated Biphenyls

Soil

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0' TSB-FR-02-02-0'MS TSB-FR-02-02-0'MSD

Introduction

This data review covers 5 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8082 for Polychlorinated Biphenyls.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

The chain-of-custodies were reviewed for documentation of cooler temperatures. All cooler temperatures met validation criteria.

II. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of multicomponent compounds was performed for the primary (quantitation) column as required by the method.

The percent relative standard deviations (%RSD) were less than or equal to 20.0% for all compounds.

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 15.0% QC limits.

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated biphenyl contaminants were found in the method blanks.

No field blanks were identified in this SDG.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. All surrogate recoveries (%R) were within QC limits with the following exceptions:

Sample	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
TSB-FR-02-02-0'	Not specified	Decachlorobiphenyl	185 (51-150)	All TCL compounds	J+ (all detects)	Р

Sample	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
TSB-FJ-06-2-0'	Not specified	Decachlorobiphenyl	189 (51-150)	All TCL compounds	J+ (all detects)	Ρ

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were within QC limits with the following exceptions:

Spike ID (Associated Samples)	Compound	MS (%R) (Limits)	MSD (%R) (Limits)	RPD (Limits)	Affected Compound	Flag	A or P
TSB-FR-02-02-0'MS/MSD (TSB-FR-02-02-0')	Aroclor-1260	457 (39-150)	-	-	Aroclor-1242 Aroclor-1248 Aroclor-1254 Aroclor-1260	J+ (all detects) J+ (all detects) J+ (all detects) J+ (all detects)	A

VIII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were within QC limits.

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Pesticide Cleanup Checks

a. Florisil Cartridge Check

Florisil cleanup was not required and therefore not performed in this SDG.

b. GPC Calibration

GPC cleanup was not required and therefore not performed in this SDG.

XI. Target Compound Identification

Raw data were not reviewed for this SDG.

XII. Compound Quantitation and Reported CRQLs

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

Data flags are summarized at the end of this report if data has been qualified.

XIV. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel F Polychlorinated Biphenyls - Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Flag	A or P	Reason
F8F050256	TSB-FR-02-02-0' TSB-FJ-06-2-0'	All TCL compounds	J+ (all detects)	Р	Surrogate recovery (%R)
F8F050256	TSB-FR-02-02-0'	Aroclor-1242 Aroclor-1248 Aroclor-1254 Aroclor-1260	J+ (all detects) J+ (all detects) J+ (all detects) J+ (all detects)	A	Matrix spike/Matrix spike duplicates (%R)

BRC Tronox Parcel F

Polychlorinated Biphenyls - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel F

Polychlorinated Biphenyls - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

VALIDATION	COMPLETENESS	WORKSHEET
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LDC #: 19099A3b SDG #: F8F050256 Laboratory: Test America

Level III

Date:	7/20/08
Page:_	
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2nd Reviewer:	$-\frac{r}{l}$

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METHOD: GC Polychlorinated Biphenyls (EPA SW 846 Method 8082)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

	Validation Area		Comments
١.	Technical holding times	Δ	Sampling dates: 6/4/0 ¥
11.	GC/ECD Instrument Performance Check	Α	
111.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	101 5 15
V.	Blanks	Δ	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	Δ	ics/D
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	Δ	
XIV.	Field duplicates	N,	
XV.	Field blanks	N	

Note:

A = Acceptable N = Not provided/applicable SW = See worksheet

ND = No compounds detected R = Rinsate FB = Field blank

D = Duplicate TB = Trip blank EB = Equipment blank

Validated Samples:

valida	s C	<u> 11</u>	-			
<u>۲</u> /	TSB-FR-02-02-0'	11		21	31	
21	TSB-FJ-02-02-0'	12		22	 32	
32	TSB-FJ-06-2-0'	13		23	33	
4	TSB-FR-02-02-0'MS	14		24	 34	
5	TSB-FR-02-02-0'MSD	15		25	 35	
6		16		26	36	
7	F8090000-208	17	6161208	27	37	
8	F8 F110000-135	18	8/63/35	28	38	
9		19		29	39	
10		20		30	40	

VALIDATION FINDINGS WORKSHEET

METHOD: Pesticide/PCBs (EPASW 846 Method 8081/8082)

	GG.							'fr		XX			Ľ		MM.			NN.	
	Y. Aroclor-1242		Z. Arocior-1248		AA. Aroclor-1254		RR Amotor Looo			CC. DB 608		DD. DB 1701		22			FF.		
Q. Endrin ketona		R. Endrin aldebude		S. sinha Chicadaa	eusono autoria		T. gamma-Chlordane		U. Toxaphene		V Aradis 1010			W. Aroclar-1221		X. Aroclor-1233	7671-10:22		
I. Dieldrin		J. 4,4'-DDE		K. Endrin		L. Endosulfan I	-	M 4.4" FOR			N. Endosulfan sulfate		0. 4,4'-DDT	•		P. Methoxychior			
A. alpha-BHC	B. beta-BHC		C. delta-BHC)				E. Heptachlor		F. Aldrin			G. Heptachjor epoxide		H. Endosulfan t				-

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Notes:

VALIDATION FINDINDS WORKSHEET Surrogate Recovery



METHOD: GC HPLC Are surrogates required by the method? Yes or No . Phase see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". <u>NA</u> Were surrogates spiked into all samples and blanks?

ΥN	N/A Did all surro	ogate reco	overies (%R)	meet the QC limit	ts?					
) *	Sample ID	<u> </u>	etector/ column	Surrogate Compound		%R (Limits)			Qualifications	H
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	Surrogate Compour	pu	Surrog	jate Compound		Surrogate Compound		Surrogate Compound		
٩	Chlorobenzene (CBZ)		0	ctacosane	Σ	Benzo(e)Pyrene	s	1-Chloro-3-Nitrobenzene	Y Tetrachloro-m- xylene	11
œ	4-Bromofluorobenzene (B	FB)	ъ Т	tho-Terphenyl	z	Terphenyl-D14	⊢	3,4-Dinitrotoluene		1
U	a,a,a-Trifluorotoluene		I Fluor	obenzene (FBZ)	0	Decachlorobiphenyl (DCB)	С	Tripentyltin		
4	Bromochlorobenene			-Triacontane	٩	1-methylnaphthalene	>	Tri-n-propyltin		1 7
w	1,4-Dichlorobutane			lexacosane	σ	Dichlorophenyl Acetic Acid (DCAA)	3	Tributyl Phosphate		1 -
u	1.4-Difluorobenzene (DE	1 (B)	, Br	omobenzene	R	4-Nitrophenol	×	Triphenvl Phosphate		1

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VALIDATION FINDINGS WORKSHEET Matrix Spike/Matrix Spike Duplicates



METHOD: GC HPLC Rease see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". Y N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? Was an MS/MSD analyzed every 20 samples for each matrix or whenever a sample extraction was performed? Were the MS/MSD percent recoveries (%R) and relative percent differences (RPD) within QC limits?

Qualifications	1+/A dut	04AL Y. Z,	AA, B.P	, / ,																					
Associated Samples	H /																							· · · · · · · · · · · · · · · · · · ·	
RPD (Limits)		()	()	()	()			()	()	()	()		()	()	()	()	()	()	()	()	()	()	()	()	
MSD %R (Limits)		()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	
MS %R (Limits)	QN-68) LSM	()	()	()	()	()		()	(()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	
Compound	BB																								
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LDC Report# 19099A4

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Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: BRC Tronox Parcel F

Collection Date: June 4, 2008

LDC Report Date: July 28, 2008

Matrix: Soil

Parameters: Metals

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'

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Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Methods 6010B, 6020, and 7000 for Metals. The metals analyzed were Aluminum, Antimony, Arsenic, Barium, Beryllium, Boron, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Lithium, Magnesium, Manganese, Molybdenum, Mercury, Nickel, Niobium, Palladium, Phosphorus, Platinum, Potassium, Selenium, Silicon, Silver, Sodium, Strontium, Sulfur, Thallium, Tin, Titanium, Tungsten, Uranium, Vanadium, Zinc, and Zirconium.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004) as there are no current guidelines for the methods stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blanks are summarized in Section III.

Field duplicates are summarized in Section XIII.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

The chain-of-custodies were reviewed for documentation of cooler temperatures. All cooler temperatures met validation criteria.

II. Calibration

An initial calibration was performed.

The frequency and analysis criteria of the initial calibration verification (ICV) and continuing calibration verification (CCV) were met with the following exceptions:

Date	Lab. Reference/ID	Analyte	%R (Limits)	Associated Samples	Flag	A or P
6/21/08	CCV (18:57)	Platinum	111.1 (85-115)	TSB-FJ-06-2-0'	J (all detects)	Ρ

III. Blanks

Method blanks were reviewed for each matrix as applicable. No contaminant concentrations were found in the initial, continuing and preparation blanks with the following exceptions:

Method Blank ID	Analyte	Maximum Concentration	Associated Samples
PB (prep blank)	Barium	0.20 mg/Kg	All samples in SDG F8F050256
ICB/CCB	Antimony Arsenic Cadmium Tungsten Vanadium	2.7 ug/L 1.0 ug/L 0.2 ug/L 1.9 ug/L 3.0 ug/L	All samples in SDG F8F050256

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

Sample	Analyte	Reported Concentration	Modified Final Concentration
TSB-FR-02-02-0'	Tungsten	0.79 mg/Kg	0.10U mg/Kg
TSB-FJ-02-02-0'	Cadmium	0.093 mg/Kg	0.10U mg/Kg

Sample	Analyte	Reported Concentration	Modified Final Concentration
TSB-FJ-06-2-0'	Antimony	0.22 mg/Kg	1.0U mg/Kg
	Tungsten	0.97 mg/Kg	1.0U mg/Kg

No field blanks were identified in this SDG.

IV. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

V. Matrix Spike Analysis

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were within QC limits with the following exceptions:

Spike ID (Associated Samples)	Analyte	MS (%R) (Limits)	MSD (%R) (Limits)	RPD (Limits)	Flag	A or P
TRX-HR-04-0' (All samples in SDG F8F050256)	Sulfur Antimony Barium Chromium Cobalt Copper Nickel Niobium Potassium Selenium Tungsten Vanadium Zirconium	72.8 (75-125) 47.7 (75-125) 70.6 (75-125) 72.0 (75-125) 72.4 (75-125) 69.3 (75-125) 69.3 (75-125) 44.1 (75-125) 59.5 (75-125) 74.5 (75-125) 70.8 (75-125) 52.8 (75-125)	- 56.6 (75-125) - - 50.7 (75-125) - - - - - - - - - - - - - - - - - - -		J- (all detects) UJ (all non-detects)	A
TRX-HR-04-0' (All samples in SDG F8F050256)	Magnesium Zinc	43.2 (75-125) 53.0 (75-125)	144.7 (75-125) 131.6 (75-125)	-	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A
TRX-HR-04-0' (All samples in SDG F8F050256)	Silicon Phosphorus	221.9 (75-125) -	336.9 (75-125) 128.2 (75-125)	-	J∔ (all detects) J∔ (all detects)	A
TRX-HR-04-0' (All samples in SDG F8F050256)	Strontium	20.7	-	-	J- (all detects) R (all non-detects)	A

VI. Duplicate Sample Analysis

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable.

VII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) were within QC limits.

VIII. Internal Standards (ICP-MS)

Raw data were not reviewed for this SDG.

IX. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

X. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met with the following exceptions:

Diluted Sample	Analyte	%D (Limits)	Associated Samples	Flag	A or P
TRX-HR-04-0'L	lron Strontium	14.3 (≤10) 11.4 (≤10)	All samples in SDG F8F050256	J (all detects) J (all detects)	A

XI. Sample Result Verification

Raw data were not reviewed for this SDG.

XII. Overall Assessment of Data

Data flags are summarized at the end of this report if data has been qualified.

XIII. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel F Metals - Data Qualification Summary - SDG F8F050256

SDG	Sample	Analyte	Flag	A or P	Reason
F8F050256	TSB-FJ-06-2-0'	Platinum	J (all detects)	Р	Calibration (%R)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Sulfur Antimony Barium Chromium Cobalt Copper Nickel Niobium Potassium Selenium Tungsten Vanadium Zirconium	J- (all detects) UJ (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Magnesium Zinc	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Silicon Phosphorus	J+ (all detects) J+ (all detects)	A	Matrix spike/Matrix spike duplicates (%R)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Strontium	J- (all detects) R (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Iron Strontium	J (all detects) J (all detects)	A	ICP serial dilution (%D)

BRC Tronox Parcel F Metals - Laboratory Blank Data Qualification Summary - SDG F8F050256

SDG	Sample	Analyte	Modified Final Concentration	A or P
F8F050256	TSB-FR-02-02-0'	Tungsten	0.10U mg/Kg	A
F8F050256	TSB-FJ-02-02-0'	Cadmium	0.10U mg/Kg	A
F8F050256	TSB-FJ-06-2-0'	Antimony Tungsten	1.0U mg/Kg 1.0U mg/Kg	A

BRC Tronox Parcel F Metals - Field Blank Data Qualification Summary - SDG F8F050256

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No Sample Data Qualified in this SDG

VALIDATION COMPLETENESS WORKSHEET

LDC #: <u>19099A4</u> SDG #: <u>F8F050256</u> Laboratory: <u>Test America</u>

Level III

	Date:_ Page:_	<u> </u>	8
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METHOD: Metals (EPA SW 846 Method 6020/6010B/7000)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/4/08
١١.	Calibration	SWXF-	
111.	Blanks	ŚW	
IV.	ICP Interference Check Sample (ICS) Analysis	A	
V.	Matrix Spike Analysis	52	>mslman
VI.	Duplicate Sample Analysis	N) • • • • •
VII.	Laboratory Control Samples (LCS)	4	Luy
VIII.	Internal Standard (ICP-MS)	N	but verienced
IX.	Furnace Atomic Absorption QC	N	Not introduced
X .	ICP Serial Dilution	50	0 ·
XI.	Sample Result Verification	N	
XII.	Overall Assessment of Data	A	
XIII.	Field Duplicates	N	
XIV.	Field Blanks	4	

Note:

A = Acceptable N = Not provided/applicable SW = See worksheet ND = No compounds detected R = Rinsate

FB = Field blank

D = Duplicate TB = Trip blank EB = Equipment blank

Validated Samples:		-1
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1	TSB-FR-02-02-0'	11	2	21	 31	
2	TSB-FJ-02-02-0'	12	2	22	 32	
3	TSB-FJ-06-2-0'	13	2	23	 33	
4	PB	14	24	24	 34	
5		15	2	25	35	
6		16	24	26	36	
7		17	2'	27	37	
8		18	24	28	 38	
9		19	21	29	39	
10		20	3	80	40	

Notes:

LDC #:____ SDG #: {

VALIDATION FINDINGS WORKSHEET Sample Specific Element Reference

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All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-3	305	Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si,
1-2	505	(Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, <u>Zr.)</u>
	'	Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,
	π	Analysis Method
ICP		Li, sp
CP-MS		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si
CP-MS		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Zr
GEAA		AL Sh. As. Ba. Be. Cd. Ca. Cr. Co. Cu. Fe. Ph. Mg. Mn. Hg. Ni, K. Se. Ag. Na, TI, V. Zn. Mo, B. Si, CN

Nb: Niobium, Pd: Palladium, P: Phosphorus, Pt: Platinum, S: Sulfur, W: Tungsten, U: Uranium, Zr: Zirconium

9.99 AV SDG #: LDC #:_

VALIDATION FINDINGS WORKSHEET Calibration

Å ЪМ ō 2nd Reviewer: Reviewer: Page:

METHOD: Trace Metals (EPA SW 846 Method 6010/7000)

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". <u>Y N/A</u> Were all instruments calibrated daily, each set-up time, and were the proper number of standards used? <u>Y N/A</u> Were all initial and continuing calibration verification percent recoveries (%R) within the control limits of 9

Were all initial and continuing calibration verification percent recoveries (%R) within the control limits of 90-110% for all analytes except mercury (80-120%) and cyanide (85-115%)?

LEVEL IV ONLY:

Y N NA

N X

Was a midrange cyanide standard distilled? Y N M/A

Are all correlation coefficients >0.995? N/A

Were recalculated results acceptable? See Level IV Initial and Continuing Calibration Recalculation Worksheet for recalculations.

	Date	Calibration ID	Analyte	%R	Associated Samples	Qualification of Data
	9-11-19	(65:8)) NOO	ta	() []]	R	エレナノや
						4
Com	ments:					

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IETHOD ample C	: Trace Me	tals (EPA S	W 846 Metl	hod 6010/	6020/7000)	Soil pre	anaration factr	ar annliad.				2nd Reviewer:
ample C	oncentrativ				(להמומוריו ואיי					•
		<u>on units, uri</u>	less otherwi	ise noted:	mg/Kg	Associ	ated Samples	: All				
Same and the second second									Sample Ide	ntification		•
Analyte	Maximum PB ^a (mg/Kg)	Maximum PB ^a (110/1.)	Maximum ICB/CCB ^a (ug/L)	Blank Action I imit	1	7	ε					
Sb			2.7	0.54			0.22 / 1.0					
As			1.0									
Ba	0.20											
PC			0.2			0.093 / 0.10						
N			1.9		0.79/1.0		0.97 / 1.0					
>			3.0									
												•
	1											

Note: a - The listed analyte concentration is the highest ICB, CCB, or PB detected in the analysis of each element.

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VALIDATION FINDINGS WORKSHEET Matrix Spike/Matrix Spike Duplicates

Page: of A \downarrow ž 2nd Reviewer:_ Reviewer:

METHOD: Trace metals (EPA SW 846 Method 6010/7000)

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". <u>MN N/A</u> Was a matrix spike analyzed for each matrix in this SDG?

Were matrix spike percent recoveries (%R) within the control limits of 75-125? If the sample concentration exceeded the spike concentration by a factor Y TO N/A

of 4 or more, no action was taken. Were all duplicate sample relative percent differences (RPD) \leq 20% for water samples and \leq 35% for soil samples? <u>Y (N) N/A</u> W

Were recalculated results acceptable? See Level IV Recalculation Worksheet for recalculations. Y N N/A

MSD MSD %RPD (Limits) Associated Samples Qualifications							44,7 V/47/A	ζω·η 1- /μ3/λ				336.9 Dr 47/2	T - / R / A	1 J ² /Wτ/A		(3)-b J/b	66.6 1 J-/47/4	128.2 17/4			
RPD (Limits) A																					
MSD %Recovery		1 56.6					1 44.7	لارمح				336.9				9-16)	9.99	2:321			
MS %Recovery	Arel	41,7	9,04	92,0	かっけ	<i>ψ</i> °, <i>ψ</i>	43,22	69,3	44~1	29.5	しそう	6/145	il'oc	63.47	10,8	53.0	<i>ک</i> ، <i>د</i>				
Analyte	5	Sb	₿¢	3	CB	3	Má	N N	٩N	×	ð	51	5~	.M	$\overline{\mathbf{V}}$	7 1	41	4	~		
Matrbx	501)																				
DI DSW/SW	TRY-HR-04-21																	-			
*											1										

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Ser LUNG LDC #: (9099 AY SDG #:

Matrix Spike/Matrix Spike Duplicates VALIDATION FINDINGS WORKSHEET

Page: A of L 3 Ŷ Reviewer: 2nd Reviewer:

METHOD: Trace metals (EPA SW 846 Method 6010/7000)

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". <u>Y N NA</u> Was a matrix spike analyzed for each matrix in this SDG? <u>Y N NA</u> Were matrix spike percent recoveries (%R) within the control limits of 75-125? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.

Were all duplicate sample relative percent differences (RPD) \leq 20% for water samples and \leq 35% for soil samples? Y (D) N/A

Y N NA WA

Were recalculated results acceptable? See Level IV Recalculation Worksheet for recalculations.

MININED ID MININE Secondry Specifier Resonance Resonance Resonance Amonto Resonance Amonto Resonance Amonto Resonance Amonto Resonance Resonance <th>·</th> <th></th> <th></th> <th>MS</th> <th>NSD I</th> <th>1.55</th> <th></th> <th></th>	·			MS	NSD I	1.55		
TRV-LHR-204-0f Sail Li Nor Gurl Log Mell LCSP-) R R $21/9$ $11/9$ $11/9$ $11/9$ $11/9$ C C $21/9$ $21/9$ $11/9$ $11/9$ $11/9$ C C $21/9$ $21/9$ $11/9$ $11/9$ $11/9$ N N $21/9$ $21/9$ $21/9$ $11/9$ $11/9$ $11/9$ N N $11/9$ $11/9$ $11/9$ $11/9$ $11/9$ $11/9$ N N $11/9$ $11/9$ $11/9$ $11/9$ $11/9$ $11/9$ <t< th=""><th>OI OSW/SW</th><th>Matrb</th><th>Analyte</th><th>%Recovery</th><th>%Recovery</th><th>RPD (Links)</th><th>Associated Samples</th><th>Qualifications</th></t<>	OI OSW/SW	Matrb	Analyte	%Recovery	%Recovery	RPD (Links)	Associated Samples	Qualifications
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	Tbv dp_01-0	01 <a'< td=""><td>Ľ.</td><td></td><td></td><td>ナネ</td><td>(I+I)</td><td>No quel (LCSTR)</td></a'<>	Ľ.			ナネ	(I+I)	No quel (LCSTR)
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$		-	46			21.9		4
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$						<u> </u>		
			3			24.8		
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$			1-6			23,7		
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			D MM			$\frac{h}{\sqrt{h}}$		
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$\frac{1}{\sqrt{2}}$			22			ていて		
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VALIDATION FINDINGS WORKSHEET **ICP Serial Dilution**

of Page: Reviewer: 2nd Reviewer:

METHOD: Trace Metals (EPA SW 846 Method 6010/6020/7000)

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

If analyte concentrations were > 50X the MDL (ICP), or >100X the MDL (ICP/MS), was a serial dilution analyzed? Y N N/A Y N/A N/A

Were ICP serial dilution percent differences (%D) ≤10%? Is there evidence of negative interference? If yes, professional judgement will be used to qualify the data.

Were recalculated results accentable? See Level IV Recalculation Worksheet for recalculation

			 	 		_	 	 	 	 		 	_	
Qualifications	J-14-14													
Associated Samples	(F4)	7												
%D (L imits)	143	ナニ												
Analyte	ĿĽ	ŚY												
Matrix	501)													
Diluted Sample ID	TRX-HR-04-01													
t Date														

Comments:

LDC Report# 19099A6

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Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:	BRC Tronox Parcel F
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Collection Date: June 4, 2008

LDC Report Date: July 28, 2008

Matrix: Soil

Parameters: Wet Chemistry

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0' TSB-FR-02-02-0'DUP

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Introduction

This data review covers 4 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA Method 300.0 for Bromide, Bromine, Chlorate, Chloride, Chorine, Fluoride, Nitrate as Nitrogen, Nitrite as Nitrogen, Orthophosphate as Phosphorus, and Sulfate and EPA SW846 Method 9071B for Oil and Grease.

The review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004) as there are no current guidelines for the method stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

Raw data were not reviewed for this SDG. The review was based on QC data.
The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

The chain-of-custodies were reviewed for documentation of cooler temperatures. All cooler temperatures met validation criteria.

II. Calibration

a. Initial Calibration

All criteria for the initial calibration of each method were met.

b. Calibration Verification

Calibration verification frequency and analysis criteria were met for each method when applicable with the following exceptions:

Sample	Analyte	Finding	Criteria	Flag	A or P
All samples in SDG F8F050256	Chlorate	Continuing calibration was not performed for these compounds.	Continuing calibration must be performed for each compound.	J (all detects) UJ (all non-detects)	Ρ

III. Blanks

Method blanks were reviewed for each matrix as applicable. No contaminant concentrations were found in the initial, continuing and preparation blanks.

No field blanks were identified in this SDG.

IV. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) samples were reviewed for each matrix as applicable. Percent recoveries (%R) were within QC limits.

V. Duplicates

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable. Results were within QC limits.

VI. Laboratory Control Samples

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) were within QC limits.

VII. Sample Result Verification

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

Data flags are summarized at the end of this report if data has been qualified.

IX. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel F Wet Chemistry - Data Qualification Summary - SDG F8F050256

SDG	Sample	Analyte	Flag	A or P	Reason
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Chlorate	J (all detects) UJ (all non-detects)	Ρ	Calibration

BRC Tronox Parcel F Wet Chemistry - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel F Wet Chemistry - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

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LDC #: 19099A6	VALIDATION COMPLETENESS WORKSHEET	Date: 7/5/08
SDG #: F8F050256	_ Level III	Page:_(_of_)_
Laboratory: Test America		Reviewer: 4

METHOD: (Analyte) Bromide, Bromine, Chlorate, Chloride, Chorine, Fluoride, Nitrate, Nitrite, Orthophosphate-P, Sulfate (EPA Method 300.0), O & G (EPA SW846 Method 9071B)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

	Validation Area		Comments
١.	Technical holding times	A	Sampling dates: 6/4/98
lla.	Initial calibration	A	
IIb.	Calibration verification	Sw/	
Ш.	Blanks	Ą	
IV	Matrix Spike/Matrix Spike Duplicates	A) MS/INP
v	Duplicates	À	
VI.	Laboratory control samples	A	LUS
VII.	Sample result verification	N	,
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
x	Field blanks	N	

Note:

A = Acceptable N = Not provided/applicable SW = See worksheet ND = No compounds detected R = Rinsate FB = Field blank D = Duplicate TB = Trip blank EB = Equipment blank 2

Validated Samples:

1	TSB-FR-02-02-0'	11	21	31
2	TSB-FJ-02-02-0'	12	22	32
3	TSB-FJ-06-2-0'	13	23	33
4	TSB-FR-02-02-0'DUP	14	24	34
5	MB	15	25	35
6		16	26	36
7		17	27	37
8		18	28	38
9		19	29	39
10		20	30	40

Notes:___

LDC #: (9099Ab SDG #: <u>(al a</u>n

VALIDATION FINDINGS WORKSHEET Sample Specific Analysis Reference

All circled methods are applicable to each sample.

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Sample ID	Matrix	Parameter
1-4	705	Br Bromine Cl Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate ClO ₄ O+C/TPH
	- 4	Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
ma	501	Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
	· · · · · · · · · · · · · · · · · · ·	Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate ClO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO ₄ O+G/TPH
		Br Bromine Cl Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate ClO ₄ O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO, O+G/TPH
		Br Bromine CI Chlorine F NO ₃ NO ₂ SO ₄ O-PO ₄ Chlorate CIO, O+G/TPH
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Comments:___

LDC #: 19 04	4 Ke	-	/ALIDATION FINDINGS WORK	SHEET	Page: <u>lot</u> Reviewer: <u>l`~</u> 2nd Beviewer:
METHOD: Inorganic	cs, EPA Method	ree	2		
Please see qualifica N N/A Wei N N/A Wei N N/A Mei	tions below for all quest re all instruments calibra re all initial and continuir all correlation coefficien	ions answered "N ted daily, each se ng calibration veri its ≥0.995 ?	". Not applicable questions are identifie st-up time, and were the proper numbe fication percent recoveries (%R) within	ed as "N/A". sr of standards used? the control limits of 90-110%	3
LEVEL IV/D ONLY: Y N N/A Wei Y N N/A Wa: Y N N/A Wa:	re recalculated results a s a balance check cond s the titrant normality ch	cceptable? See l ucted prior to the ecked?	evel IV Initial and Continuing Calibratio TDS analysis.?	on Recaluculation Worksheet	lor recalulations.
# Date	Calibration ID	Analyte	%R	Associated Samples	Qualifications
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Comments:					
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Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:	BRC Tronox Parcel F
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Collection Date: June 4, 2008

LDC Report Date: July 24, 2008

Matrix:

Parameters: Gasoline Range Organics

Soil

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0' TSB-FR-02-02-0'MS TSB-FR-02-02-0'MSD

Introduction

This data review covers 5 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Gasoline Range Organics.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

The following are definitions of the data qualifiers:

Raw data were not reviewed for this SDG. The review was based on QC data.

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

The chain-of-custodies were reviewed for documentation of cooler temperatures. All cooler temperatures met validation criteria.

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed as required by the method.

The percent relative standard deviations (%RSD) of calibration factors for compounds were less than 20.0% .

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 15.0% QC limits.

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

III. Blanks

Method blanks were reviewed for each matrix as applicable. No gasoline range organic contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were added to all samples and blanks as required by the method. All surrogate recoveries (%R) were within QC limits.

b. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were within QC limits.

c. Laboratory Control Samples

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were within QC limits.

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Compound Quantitation and CRQLs

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

Data flags have been summarized at the end of this report if data has been qualified.

IX. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel F Gasoline Range Organics - Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

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BRC Tronox Parcel F Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel F Gasoline Range Organics - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #:	19099A7	VALIDATION COMPLETENESS WORKSHEET	
SDG #:	F8F050256	Level III	

SDG #: F8F050256 Laboratory: Test America

Level III

Date: 7/20/08
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Reviewer: <u>7</u>
2nd Reviewer:
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METHOD: GC Gasoline Range Organics (EPA SW846 Method 8015B)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

	Validation Area		Comments
١.	Technical holding times	A	Sampling dates: 6/4/0 ¥
lla.	Initial calibration	Δ	• /
llb.	Calibration verification/ICV	A	$ CV \leq 15$
111.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	1cs/17
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
Χ.	Field blanks	N	

ND = No compounds detected D = Duplicate Note: A = Acceptable TB = Trip blank N = Not provided/applicable R = Rinsate SW = See worksheet FB = Field blank EB = Equipment blank

SOIL Validated Samples:

1	TSB-FR-02-02-0'	11		21	31	
2	TSB-FJ-02-02-0'	12		22	32	
3	TSB-FJ-06-2-0'	13		23	33	
4	TSB-FR-02-02-0'MS	14		24	34	
5	TSB-FR-02-02-0'MSD	15		25	35	
6		16		26	36	
7		17	8164169	27	37	
8		18		28	38	
9		19		29	39	
10		20		30	40	

Notes:

LDC Report# 19099A8

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: BRC Tronox Parcel F

Collection Date: June 4, 2008

LDC Report Date: July 24, 2008

Matrix:

Parameters: Diesel Range Organics

Soil

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0' TSB-FR-02-02-0'MS TSB-FR-02-02-0'MSD

Introduction

This data review covers 5 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Diesel Range Organics.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

The chain-of-custodies were reviewed for documentation of cooler temperatures. All cooler temperatures met validation criteria.

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed as required by the method.

The percent relative standard deviations (%RSD) of calibration factors for compounds were less than 20.0% .

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 15.0% QC limits.

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

III. Blanks

Method blanks were reviewed for each matrix as applicable. No diesel range organic contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were added to all samples and blanks as required by the method. All surrogate recoveries (%R) were within QC limits.

b. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Although the MS/MSD percent recovery (%R) was not within QC limits for one compound, the LCS percent recovery (%R) was within QC limits and no data were qualified.

c. Laboratory Control Samples

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) were within QC limits.

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Compound Quantitation and CRQLs

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

Data flags have been summarized at the end of this report if data has been qualified.

IX. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel F Diesel Range Organics - Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel F Diesel Range Organics - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel F Diesel Range Organics - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: <u>19099A8</u> SDG #: <u>F8F050256</u> Laboratory: <u>Test America</u>

Level III

Date: 7/20/08	/
Page: /of /	
Reviewer: <u></u>	
2nd Reviewer:	

METHOD: GC Diesel Range Organics (EPA SW846 Method 8015B)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

	Validation Area		Comments
Ι.	Technical holding times	Δ	Sampling dates: レーリーレン
lla.	Initial calibration	Δ	
IIb.	Calibration verification/ICV	A	$1cr \leq 15$
III.	Blanks	A	
IVa.	Surrogate recovery	<u>A</u>	
IVb.	Matrix spike/Matrix spike duplicates	SW	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	Δ	
IX.	Field duplicates	\sim	
X .	Field blanks	N	

 Note:
 A = Acceptable
 ND = No compounds detected
 D = Duplicate

 N = Not provided/applicable
 R = Rinsate
 TB = Trip blank

 SW = See worksheet
 FB = Field blank
 EB = Equipment blank

Validated Samples: SO/L

11	TSB-FR-02-02-0'	11	8-1612	21		31	
21	TSB-FJ-02-02-0'	12	F8 F0 9000-207	22	8161207	32	
1 3	TSB-FJ-06-2-0'	13		23		33	
4	TSB-FR-02-02-0'MS	14		24		34	
5	TSB-FR-02-02-0'MSD	15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

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Matrix Spike/Matrix Spike Duplicates VALIDATION FINDINGS WORKSHEET



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Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". <u>N N/A</u> Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? <u>N N/A</u> Was an MS/MSD analyzed every 20 samples for each matrix or whenever a sample extraction was performed?

Samples Qualifications	10 00 4 Tes																								
Associated	/ #																								
RPD (Limits)	()	()	()	()	()	(()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	()	
MSD %R (Limits)	111 (55-104)	()		()	()			()	()	()	()		()	()	()	()	()) (()	()	()	()		()	
MS %R (Limits)	114 (SS-104)	()	()	(()	()	()	()	()	()	()] ()	()	()	()	()	()		()	()	()	()	()	()	
Compound	PRO																								
QI QSW/SW	4+5	-																							

LDC Report# 19099A9

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:	BRC Tronox Parcel F
Collection Date:	June 4, 2008
LDC Report Date:	July 24, 2008
Matrix:	Soil
Parameters:	Polynuclear Aromatic Hydrocarbons
Validation Level:	EPA Level III
Laboratory:	TestAmerica, Inc.
Sample Delivery Group (SDG):	F8F050256

Sample Identification

TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0' TSB-FR-02-02-0'MS TSB-FR-02-02-0'MSD

Introduction

This data review covers 5 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8310 for Polynuclear Aromatic Hydrocarbons.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

The chain-of-custodies were reviewed for documentation of cooler temperatures. All cooler temperatures met validation criteria.

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed as required by the method.

The percent relative standard deviations (%RSD) were less than or equal to 20.0% for all compounds.

b. Calibration Verification

Calibration verification was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 15.0% QC limits with the following exceptions:

Date	Detector	Compound	%D	Associated Samples	Flag	A or P
6/11/08	Not specified	Benzo(a)anthracene Benzo(k)fluoranthene	15.5 15.2	All samples in SDG F8F050256	J+ (all detects) J+ (all detects)	А

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds with the following exceptions:

Date	Detector	Compound	%D	Associated Samples	Flag	A or P
6/4/08	Not specified	Benzo(k)fluoranthene	16.6	All samples in SDG F8F050256	J+ (all detects)	A

III. Blanks

Method blanks were reviewed for each matrix as applicable. No polynuclear aromatic hydrocarbon contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were added to all samples and blanks as required by the method. All surrogate recoveries (%R) were within QC limits.

b. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Although the MS/MSD percent recoveries (%R) and relative percent differences (RPD) were not within QC limits for some compounds, the LCS percent recoveries (%R) were within QC limits and no data were qualified.

c. Laboratory Control Samples

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) were within QC limits.

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Compound Quantitation and CRQLs

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

Data flags are summarized at the end of this report if data has been qualified.

IX. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel F Polynuclear Aromatic Hydrocarbons - Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Flag	A or P	Reason
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Benzo(a)anthracene Benzo(k)fluoranthene	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D)
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	Benzo(k)fluoranthene	J+ (all detects)	A	Continuing calibration (ICV %D)

BRC Tronox Parcel F Polynuclear Aromatic Hydrocarbons - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel F

Polynuclear Aromatic Hydrocarbons - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

VALIDATION COMPL	ETENESS WORKSHEET
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LDC #: <u>19099A9</u> SDG #: <u>F8F050256</u> Laboratory: <u>Test America</u>

Level III

	Date:	<u>1/20/08</u>
	Page:_	
	Reviewer:	<u>n</u>
2nd	Reviewer:	
		F

METHOD: GC Polynuclear Aromatic Hydrocarbons (EPA SW 846 Method 8310)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

	Validation Area		Comments
Ι.	Technical holding times	Δ	Sampling dates: 6/4/0 &
lla.	Initial calibration	Δ	· /
llb.	Calibration verification/ICV	SA	$ CY \leq 15$
- 111.	Blanks	4	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	SW	
IVc.	Laboratory control samples	A	165
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N.	
Х.	Field blanks	Ň	

Note:

A = Acceptable N = Not provided/applicable SW = See worksheet ND = No compounds detected R = Rinsate FB = Field blank D = Duplicate TB = Trip blank EB = Equipment blank

Validated Samples:

	5014						
ŧ1	TSB-FR-02-02-0'	11	F8F090000-209	21	8161209	31	
$\frac{1}{2}$	TSB-FJ-02-02-0'	12		22	'	32	
3 1	TSB-FJ-06-2-0'	13		23		33	
4	TSB-FR-02-02-0'MS	14	111 0 000 000000 0000	24		34	
5	TSB-FR-02-02-0'MSD	15		25		35	
6		16		26		36	
7		17	8161208	27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

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METHOD:	

VALIDATION FINDINGS WORKSHEET

8310	8330	8151	8141	8141(con't)	8021B
L Acenaphthene	A. HMX	A. 2.4-D			
Account the second				V. Fensulfothion	V. Benzene
- Aveilapiluiylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethvi Benzene
). Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinnhos-methvl	
. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Goumanhos	DDD ND V.4
. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GC Total Vilance
i. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB Trichloronate	
. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC Trichlorinto	
Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	1 Dimethrosta		
. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon		
. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfaton		
. Fluorene	L. 2-Nitrotoluene	L 2,4.5-TP (silvex)	Parathion-methul	C. Etter	
l. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M Ronnel		
. Naphthalene	N. 4-Nitrotoluene		M. Molathian	nn. ieuacnioryinpnos	
. Phenanthrene	0.		0. Chlornvrifes	II. Suiproros	
. Pyrene	ď		P. Fenthion		
	٥		Q. Parathion-ethvi		
			R. Trichloronate		
			S. Merphos		
			T. Stirofos		
			U. Tokuthion		

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Notes:

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GC HPLC

METHOD:

VALIDATION FINDINGS WORKSHEET **Continuing Calibration**

∕of ∕ Page: Reviewer:

٢ 2nd Reviewer:

> Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". What type of continuing calibration calculation was performed? $\[mathcalled]{WD}$ or $\[mathcalled]{RPD}$ $\[mathcalled]{YNNA}$ Were continuing calibration standards analyzed at the required frequencies? $\[mathcalled]{YNNA}$ Did the continuing calibration standards meet the %D / RPD validation criteria of $\leq 15.0\%$?

<u>Y N N/A</u> <u>Y N N/A</u> Level IX Only N/N/N

Were the retention times for all calibrated compounds within their respective acceptance windows?

	1	2												Ī	
Oualification	1+/2-				A										
Associated Samples	A//+ A/K	1121 1 310													
RT (limit)				()) ((((((
%D / RPD (Limit ≤ 15.0)	16.6			15.5	15.2										
Compound	H PA		-	D	#										
Detector/ Colurnn	inot south	1 1		1							,				
Standard ID	& FCV768			6CA L827											
t Date	6/4/08	, ,	•	11/0X	-										
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e er	HPLC
20994	99
SDG #: //	METHOD:

VALIDATION FINDINGS WORKSHEET Matrix Spike/Matrix Spike Duplicates



METHOD

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". Y N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? Y N N/A Was an MS/MSD analyzed every 20 samples for each matrix or whenever a sample extraction was performed?

Y MINIA. Were the MS/MSD percent (acronents (RPD) within QC limits) Among and relative percent (acronents (RPD) within QC limits) * Misses to Commond within MD MD Curve of the MD Among and relative percent (acronents (RPD) within QC limits) * Misses to Among and relative percent (acronents (RPD) within QC limits) # Mong and					_																						=
Warren tree tree MANADD percent recovering (Arch) and relatives (Arch) and relative percent differences (Arch) and		Qualifications	no ou al	61,501																							
WINLA Were the MSMASD percent recoveries (arX) and relative percent diffeences (RPD) within GC # MSMSD ID Compound Xm SS MSSD ID Compound Xm SS MSS MSS MS MS <	limits?	Associated Samples	#/																								
Y M INIA Were the MS/MSU percent recoveries (%eR) and relative percent different di different di different different di di different di different	ences (RPD) within QC	RPD (Limits)	* 26 RPD)	()	(()	()		()	()	(()	()	()	()	()	()	()	[()	()	()	()	()	()	()	
T MAINA Were the MS/MSD ID Compound Ms/MSD ID ** Ms/MSD ID Compound Ms/MSD ID ** #* Ms/MSD ID Compound Ms/MSD ID ** #* Ms/MSD ID Compound Ms/MSD ID ** #* #* Ms/MSD ID Compound Ms/MSD ID ** # 4 * ** ** (*) (*) ** # 4 * ** ** (*)	I relative percent diffei	MSD %R (Limits)	parley % K	() /	()	()	(()	()	()	()	()	()	(()	()	()	()	()		()	()	()	()	()	()	
* MS/MSD ID Compound # MS/MSD ID Compound	nt recoveries (%서) and	MS %R (Limits)	compainds)	()		()	()	()	()	()	()	()	()		()	()	()	()	()	()	()	()	()	()	()	()	,
× ₩ N/A Were the * Ms/MsD ID + 4 € 5	MS/MSU perce	Compound	several	/									· · · · · · · · · · · · · · · · · · ·														
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Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: BRC Trond	ox Parcel F
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Collection Date: June 4, 2008

LDC Report Date: July 23, 2008

Matrix: Soil

Parameters: Dioxins/Dibenzofurans

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'

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Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

This review follows USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005) as there are no current guidelines for the method stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

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I. Technical Holding Times

All technical holding time requirements were met.

The chain-of-custodies were reviewed for documentation of cooler temperatures. All cooler temperatures met validation criteria.

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25%.

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds with the following exceptions:

Date	Compound	%D	Associated Samples	Affected Compound	Flag	A or P
7/3/08	¹³ C-2,3,7,8-TCDF	57.3	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	2,3,7,8-TCDF	J+ (all detects)	Ρ

The percent differences (%D) of the second source calibration standard were less than or equal to 25.0% for all compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks.

No field blanks were identified in this SDG.

VI. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there were no matrix spike (MS) and matrix spike duplicate (MSD) analyses specified for the samples in this SDG, and therefore matrix spike and matrix spike duplicate analyses were not performed for this SDG.

VII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. The percent recoveries (%R) were within the QC limits.

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

Sample	Internal Standards	%R (Limits)	Compound	Flag	A or P
TSB-FJ-02-02-0'	 ¹³C-2,3,7,8-TCDD ¹³C-1,2,3,7,8-PeCDD ¹³C-1,2,3,6,7,8-HxCDD ¹³C-1,2,3,4,6,7,8-HpCDD ¹³C-2,3,7,8-TCDF ¹³C-1,2,3,7,8-PeCDF ¹³C-1,2,3,4,7,8-HxCDF ¹³C-1,2,3,4,6,7,8-HpCDF 	23 (40-135) 20 (40-135) 16 (40-135) 9.4 (40-135) 4.6 (40-135) 30 (40-135) 20 (40-135) 15 (40-135) 8.6 (40-135)	All TCL compounds	J (all detects) UJ (all non-detects)	Ρ
TSB-FJ-06-2-0'	¹³ C-OCDD	36 (40-135)	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	Ρ
TSB-FR-02-02-0'	¹³ C-2,3,7,8-TCDF	147.4 (40-135)	2,3,7,8-TCDF	J (all detects) UJ (all non-detects)	Ρ

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Compound Quantitation and CRQLs

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

Data flags are summarized at the end of the report if data has been qualified.

XIV. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel F Dioxins/Dibenzofurans - Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Flag	A or P	Reason
F8F050256	TSB-FR-02-02-0' TSB-FJ-02-02-0' TSB-FJ-06-2-0'	2,3,7,8-TCDF	J+ (all detects)	Ρ	Routine calibration (%D)
F8F050256	TSB-FJ-02-02-0'	All TCL compounds	J (all detects) UJ (all non-detects)	Ρ	Internal standards (%R)
F8F050256	TSB-FJ-06-2-0'	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	Ρ	Internal standards (%R)
F8F050256	TSB-FR-02-02-0'	2,3,7,8-TCDF	J (all detects) UJ (all non-detects)	Ρ	Internal standards (%R)

BRC Tronox Parcel F

Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel F Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: 19099A21 SDG #: F8F050256 Laboratory: Test America

Level III

	Date:	<u>7/19/08</u>
	Page:_	(of]
	Reviewer:	K
2nd	Reviewer:	<u>A</u>
		1

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

	Validation Area		Comments
١.	Technical holding times	A	Sampling dates: 6/4/08
11.	GC/MS Instrument performance check	4	
111.	Initial calibration	4	
IV.	Routine calibration /ICV ICV	SW &	
V.	Blanks	À	
VI.	Matrix spike/Matrix spike duplicates	N	chent specified
VII.	Laboratory control samples	4	105
VIII.	Regional quality assurance and quality control	Ň	
IX.	Internal standards	SW	
X .	Target compound identifications	N	
XI.	Compound quantitation and CRQLs	N	
XII.	System performance	N	
XIII.	Overall assessment of data	4	
XIV.	Field duplicates	N	
XV.	Field blanks	Z	

Note:

A = Acceptable

ND = No compounds detected R = Rinsate

FB = Field blank

N = Not provided/applicable SW = See worksheet

Validated Samples:

1	TSB-FR-02-02-0'	11	8165175	21	31	
2	TSB-FJ-02-02-0'	12	1	22	32	
3	TSB-FJ-06-2-0'	13		23	33	
4		14		24	34	
5		15		25	35	
6		16		26	36	
7	· · · · · · · · · · · · · · · · · · ·	17		27	37	
8		18		28	38	
9		19		29	39	
10		20		30	40	

D = Duplicate

TB = Trip blank EB = Equipment blank

Notes:
VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

A. 2.3.7.8-TCDD	F. 1.2.3.4.6.7.8-HnCDD	K 1 2 3 4 7 8-HVCDE		
B. 1,2,3,7,8-PeCDD	G. OCDD	L. 1,2,3,6,7,8-HxCDF	a. ocdf	V. Total TCDF
C. 1,2,3,4,7,8-HxCDD	H. 2,3,7,8-TCDF	M. 2,3,4,6,7,8-HxCDF	R. Total TCDD	W. Total PeCDF
D. 1,2,3,6,7,8-HxCDD	I. 1,2,3,7,8-PeCDF	N. 1,2,3,7,8,9-HxCDF	S. Total PeCDD	X. Total HxCDF
E. 1,2,3,7,8,9-HxCDD	J. 2,3,4,7,8-PeCDF	O. 1,2,3,4,6,7,8-HpCDF	T. Total HxCDD	Y. Total HpCDF

Notes:

12766061	: F8F050256
*	#
ğ	SDG

VALIDATION FINDINGS WORKSHEET

Routine Calibration



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METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Was a routine calibration was performed at the beginning and end of each 12 hour period? Were all percent differences (%D) of RRFs \leq 20% for unlabeled compounds and \leq 30% for labeled? Did all routine calibration standards meet the Ion Abundance Ratio criteria? Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". Y (T) N/A Y (T) N/A

			(H) 2/ Env/2	(# from DE 225)			-							Ion Abundance Ratio	0.65-0.89	1.32-1.78	1 05-1 43		U.40-U.95	0.37-0.01	0.88-1.20
	Associated Samples	colduno nomina u	ACT NB											Selected ions (m/z)	M/M+2	M+2/M+4	M+2/M+4	M/M+2		V TIV/CTW	5+W/2+W
o criteria?	Finding lon Abundance Ratío													PCDFs	Tetra-	Penta-	Hexa-	Hexa- ¹³ C-HxCDF (IS) only	Hepta- ¹³ C-HpCDF (IS) only	Hepta-	Octa-
	Finding %D (Limit: ≤30.0%)														U.65-U.89	1.32-1.78	1.05-1.43	0.43-0.59	0.37-0.51	0.88-1.20	0.76-1.02
	Compound	20 13/23762-151 OZ											Selected ions (m/z) 1 on		V TW/CTW	M + 2/M + 2	MI+Z/M+4	M/M+2	M/M+2	M+2/M+4	M+2/M+4
	Standard ID	52018807520	(endine)	10									PCDDs 5					cur (is) any	pCDF (IS) only		
	# Date	30/4/2												Tetra-	Penta-	Hexa-	Heve ¹³ C U.V	110,000 C-11A		Hepta-	Octa-

CONCAL90.21

LDC SDG	#:19099A #: FSF05	21	VALIDATION FI	NDINGS W	ORKSHEET <u>ds</u>		Page: 1 of 1 Reviewer: 4
	HOD: HRGC/ se see qualific VNA An VMA An	HRMS Dioxins/Dibenzofura ations below for all questic e all internal standard reco as the S/N ratio all internal	ns (EPA SW 846 Method 8290) ons answered "N". Not applicable veries were within the 40-135% c standard peaks <u>></u> 10?	questions are :riteria?	identified as "N/A".		2nd Reviewer:
#	Date	Lab ID/Reference	Internal Standard	4 %	Recovery (Limit: 40-135%)		Qualifications
		х	5	23	1 40-132) さん	IA (W.D. + Q)
			4	20		۱ (
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		۶	T	36	`)	<u>}</u> ((C, &)
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			4	147.) ((+)
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)	(
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)	(
)	(
		Internal Standards	Check Standard Used		Recovery Standards		Check Standard Used
×	¹³ C-2,3,7,8-TC	DF		K 13	0-1.2.3.4-TCDD		
Ъ.	¹³ C-2,3,7,8-TC	CDD		<u>ت</u>	0-1,2,3,7,8,9-HxCDD		
Ċ	¹³ C-1,2,3,7,8-1	PeCDF		W			
<u>ا</u> م	¹³ C-1,2,3,7,8-1	PeCDD		z			
ய்	¹³ C-1,2,3, % 7,6	B-HxCDF		ö			
ц	¹³ C-1,2,3,6,7,8	8-HxCDD		<u>a.</u>			
σ	¹³ C-1,2,3,4,6,7	7,8-HpCDF		ö			
r	"C-1,2,3,4,6,	7,8-HpCDD		œ'			

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