LABORATORY DATA CONSULTANTS, INC.
7750 El Camino Real, Suite 2L Carlsbad, CA 92009 Phone: 760/634-0437 Fax: 760/634-0439

Northgate Environmental Management, Inc.
1100 Quail Street Ste. 102
New Port beach, CA 92660
ATTN: Ms. Cindy Arnold

October 16, 2009

SUBJECT: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Data Validation

Dear Ms. Arnold,

Enclosed are the revised data validation reports for the fraction listed below. Please replace the previously submitted reports with the enclosed revised reports.

LDC Project # 21494:

SDG #	Fraction
8304603, 8304604, 8304606 8304610, 8304621	Organophosphorus Pesticides

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

Sincerely,

Erlinda T. Rauto
Operations Manager/Senior Chemist

V:\LOGIN\TronoxNG\21494REV.wpd

LABORATORY DATA CONSULTANTS, INC.
7750 El Camino Real, Suite 2L Carlsbad, CA 92009 Phone: 760/634-0437 Fax: 760/634-0439

Northgate Environmental Management, Inc.
1100 Quail Street Ste. 102
New Port beach, CA 92660
ATTN: Ms. Cindy Arnold

September 28, 2009

SUBJECT: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Data Validation

Dear Ms. Arnold,

Enclosed are the final validation reports for the fractions listed below. These SDGs were received on September 4, 2009. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 21494:

SDG #	Fraction
8304601, 8304602, 8304603, 8304604, 8304605, 8304606, 8304607, 8304608, 8304609, 8304610, 8304611, 8304612, 8304613, 8304614, 8304615, 8304616, 8304617, 8304619, 8304620, 8304621, 8304622, 8304623, 8304624	Organophosphorus Pesticides Metals

The data validation was performed under Stage 2B & 4 guidelines. The analyses were validated using the following documents, as applicable to each method:

- Standard Operating Procedures (SOP) 40, Data Review/Validation, BRC 2009
- Quality Assurance Project Plan Tronox LLC Facility, Henderson Nevada, June 2009
- NDEP Guidance, May 2006
- USEPA, Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review, June 2008
- 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

V:\LOGIN\TronoxNG\21494COV.wpd

Attachment 1

Stage 2B/4 **EDD** **LDC #21494 (Tronox LLC-Northgate, Henderson NV / Tronox Phase B 2009)**

LDC	SDG#	DATE REC'D	(3) DATE DUE	As,Se (6020)		OPHS Pest. (8141A)																													
Matrix:	Water/Soil			W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S
A	8304601	09/04/09	09/28/09	-	-	3	0																												
B	8304602	09/04/09	09/28/09	-	-	0	3																												
C	8304603	09/04/09	09/28/09	-	-	9	0																												
D	8304604	09/04/09	09/28/09	-	-	5	0																												
E	8304605	09/04/09	09/28/09	-	-	0	4																												
F	8304606	09/04/09	09/28/09	-	-	0	6																												
G	8304607	09/04/09	09/28/09	9	0	4	0																												
H	8304608	09/04/09	09/28/09	11	0	1	0																												
I	8304609	09/04/09	09/28/09	7	0	2	0																												
J	8304610	09/04/09	09/28/09	-	-	2	4																												
K	8304611	09/04/09	09/28/09	7	0	-	-																												
L	8304612	09/04/09	09/28/09	-	-	1	6																												
M	8304613	09/04/09	09/28/09	-	-	0	4																												
N	8304614	09/04/09	09/28/09	7	0	1	0																												
O	8304615	09/04/09	09/28/09	7	0	1	0																												
P	8304616	09/04/09	09/28/09	-	-	5	11																												
Q	8304617	09/04/09	09/28/09	-	-	0	4																												
S	8304619	09/04/09	09/28/09	4	0	-	-																												
T	8304620	09/04/09	09/28/09	-	-	1	4																												
U	8304621	09/04/09	09/28/09	-	-	0	5																												
V	8304622	09/04/09	09/28/09	5	0	1	0																												
W	8304623	09/04/09	09/28/09	-	-	1	2																												
X	8304624	09/04/09	09/28/09	-	-	0	6																												
Total	T/LR			57	0	37	59	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	153

Shaded cells indicate Stage 4 validation (all other cells are Stage 2B validation). These sample counts do not include MS/MSD, and DUPs

EDD CHECKLIST

LDC #: 21494

SDG #: 8304601, 8304602, 8304603, 8304604, 8304605, 8304606, 8304607, 8304608, 8304609, 8304610, 8304611, 8304612, 8304613, 8304614, 8304615, 8304616, 8304617, 8304619, 8304620, 8304621, 8304622, 8304623, 8304624,

Reviewer: JE

2nd Reviewer: BC

Tronox Northgate Henderson Worksheet

EDD Area	Yes	No	NA	Findings/Comments
I. Completeness				
Is there an EDD for the associated Tronox validation report?	X			
II. EDD Qualifier Population				
Were all qualifiers from the validation report populated into the EDD?	X			
III. EDD Lab Anomalies				
Were EDD anomalies identified?	X			
If yes, were they corrected or documented for the client?	X			See EDD_discrepancy_ form_LDC21494_092409.doc
IV. EDD Delivery				
Was the final EDD sent to the client?	X			

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Data Validation Reports
LDC# 21494

Metals

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 15 through June 19, 2009

LDC Report Date: September 14, 2009

Matrix: Water

Parameters: Metals

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304607

Sample Identification

M-29B
M-130B
M-130BDISS
M-78B
M-128B
M-128BDISS
H-38B
M-19B
M-34B
M-29BMS
M-29BMSD
M-130BDISSMS
M-130BDISSMSD

Introduction

This data review covers 13 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Metals. The metals analyzed were Arsenic and Selenium.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and 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.

Blanks are summarized in Section IV.

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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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. ICPMS Tune

The mass calibration was within 0.1 AMU and the percent relative standard deviation (%RSD) was less than or equal to 5% .

III. Calibration

An initial calibration was performed.

The frequency and analysis criteria of the initial calibration verification (ICV) and continuing calibration verification (CCV) were met.

IV. 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
ICB/CCB	Selenium	0.887 ug/L	M-130BDISS M-128BDISS

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
M-128BDISS	Selenium	3.2 ug/L	5.0U ug/L

No field blanks were identified in this SDG.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. 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.

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

Raw data were not reviewed for this SDG.

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met.

XII. Sample Result Verification and Project Quantitation Limit

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304607	All analytes reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Data Qualification Summary - SDG 8304607

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
8304607	M-29B M-130B M-130BDISS M-78B M-128B M-128BDISS H-38B M-19B M-34B	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Laboratory Blank Data Qualification Summary - SDG 8304607

SDG	Sample	Analyte	Modified Final Concentration	A or P	Code
8304607	M-128BDISS	Selenium	5.0U ug/L	A	bl

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Field Blank Data Qualification Summary - SDG 8304607

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494G4
SDG #: 8304607
Laboratory: Test America

Date: 9/11/09
Page: 1 of 1
Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: As & Se (EPA SW 846 Method 6020)

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: 6/15/09 - 6/19/09
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	SW	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	[illegible]
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	N	[illegible]
X.	Furnace Atomic Absorption QC	N	[illegible]
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
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: All

1	M-29B	11	M-29BMSD	21	[illegible]	31	
2	M-130B	12	M-130BDISSMS	22		32	
3	M-130BDISS	13	M-130BDISSMSD	23		33	
4	M-78B	14		24		34	
5	M-128B	15		25		35	
6	M-128BDISS	16		26		36	
7	H-38B	17		27		37	
8	M-19B	18		28		38	
9	M-34B	19		29		39	
10	M-29BMS	20		30		40	

Notes: _____

LDC #: 21494
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Reviewer: ____
2nd reviewer: ____

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-9	Aq	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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
10, 11, 12, 13	Aq	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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
Analysis Method		
ICP		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, CN⁻, ___ ___
ICP Trace		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, CN⁻, ___ ___
ICP-MS		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, CN⁻, ___ ___
GFAA		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, CN⁻,

Comments: Mercury by CVAA if performed

LDC #: 21494G4
SDG #: See Cover
METHOD: Trace Metals (EPA SW 846 Method 6020)
Sample Concentration units, unless otherwise noted: ug/L

VALIDATION FINDINGS WORKSHEET
PB/ICB/CCB QUALIFIED SAMPLES
Soil preparation factor applied: _____
Associated Samples: 3, 6

(be)

					Sample Identification									
Analyte	Maximum PB[a] (mg/Kg)	Maximum PB[a] (ug/L)	Maximum ICB/CCB[a] (ug/L)	Blank Action Limit	6									
Se			0.887		3.2 / 5.0									

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 23 through June 25, 2009

LDC Report Date: September 14, 2009

Matrix: Water

Parameters: Metals

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304608

Sample Identification

M-125B
M-125BDISS
M-22AB
M-17AB
M-17ABDISS
M-64B
M-75B
M-13AB
M-13ABDISS
M-13009AB
M-13009ABDISS
M-125BMS
M-125BMSD
M-125BDISSMS
M-125BDISSMSD
M-22ABMS
M-22ABMSD
M-13ABDISSMS
M-13ABDISSMSD

Introduction

This data review covers 19 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Metals. The metals analyzed were Arsenic and Selenium.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and 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.

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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. ICPMS Tune

The mass calibration was within 0.1 AMU and the percent relative standard deviation (%RSD) was less than or equal to 5% .

III. Calibration

An initial calibration was performed.

The frequency and analysis criteria of the initial calibration verification (ICV) and continuing calibration verification (CCV) were met.

IV. 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.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. 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
M-13ABDISSMS/MSD (M-13ABDISS)	Arsenic	-	132 (75-125)	-	J+ (all detects)	A

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

All internal standard percent recoveries (%R) were within QC limits.

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met.

XII. Sample Result Verification and Project Quantitation Limit

All sample result verifications were acceptable.

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304608	All analytes reported below the PQL.	J (all detects)	A

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

Samples M-13AB and M-13009AB and samples M-13ABDISS and M-13009ABDISS were identified as field duplicates. No metals were detected in any of the samples with the following exceptions:

Analyte	Concentration (ug/L)		RPD (Limits)	Difference (Limits)	Flags	A or P
	M-13AB	M-13009AB				
Arsenic	120	120	-	0 (≤50)	-	-

Analyte	Concentration (ug/L)		RPD (Limits)	Difference (Limits)	Flags	A or P
	M-13ABDISS	M-13009ABDISS				
Arsenic	110	120	-	10 (≤50)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Data Qualification Summary - SDG 8304608

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
8304608	M-13ABDISS	Arsenic	J+ (all detects)	A	Matrix spike/Matrix spike duplicates (%R) (m)
8304608	M-125B M-125BDISS M-22AB M-17AB M-17ABDISS M-64B M-75B M-13AB M-13ABDISS M-13009AB M-13009ABDISS	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Laboratory Blank Data Qualification Summary - SDG 8304608

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Field Blank Data Qualification Summary - SDG 8304608

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage ~~2B~~ 4

LDC #: 21494H4
SDG #: 8304608
Laboratory: Test America

Date: 9/14/09
Page: 1 of 1
Reviewer: ~
2nd Reviewer: gnA

METHOD: As & Se (EPA SW 846 Method 6020)

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: 6/23/09 - 6/25/09
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	SW	3 MS/MSD
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	Ley
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	Not Validated
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	~~N~~ A	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	SW	(8,10), (9,11)
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: All

1	M-125B	11	M-13009ABDISS	21	MB	31	
2	M-125BDISS	12	M-125BMS	22		32	
3	M-22AB	13	M-125BMSD	23		33	
4	M-17AB	14	M-125BDISSMS	24		34	
5	M-17ABDISS	15	M-125BDISSMSD	25		35	
6	M-64B	16	M-~~17~~22ABMS	26		36	
7	M-75B	17	M-~~17~~22ABMSD	27		37	
8	M-13AB	18	M-13ABDISSMS	28		38	
9	M-13ABDISS	19	M-13ABDISSMSD	29		39	
10	M-13009AB	20		30		40	

Notes: _____

LDC #: 31494H4
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

Page: 1 of 2
Reviewer: VV
2nd Reviewer: amA

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

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. ICP/MS				
Were all isotopes in the tuning solution mass resolution within 0.1 amu?	✓			
Were %RSD of isotopes in the tuning solution ≤5%?	✓			
III. Calibration				
Were all instruments calibrated daily, each set-up time?	✓			
Were the proper number of standards used?	✓			
Were all initial and continuing calibration verification %Rs within the 90-110% (80-120% for mercury) QC limits?	✓			
Were all initial calibration correlation coefficients > 0.995?	✓			
IV. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
V. ICP Interference Check Sample (ICS) Analysis				
Were ICP interference check samples performed daily?	✓			
Were the AB solution percent recoveries (%R) with the 80-120% QC limits?	✓			
VI. Matrix Spike/Matrix Spike Duplicate Analysis				
Were a matrix spike (MS) and duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD or MS/DUP. Soil / Water.	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the 75-125 QC limits? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.		✓		
Were the MS/MSD or duplicate relative percent differences (RPD) ≤ 20% for waters and ≤ 35% for soil samples? A control limit of +/- RL(+/-2X RL for soil) was used for samples that were ≤ 5X the RL, including when only one of the duplicate sample values were < 5X the RL.	✓			
VII. Laboratory Control Sample (LCS)				
Was an LCS anaylzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the 80-120% QC limits for water samples and laboratory established QC limits for soils?	✓			

LDC #: 14944M
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Page: 2 of 2
Reviewer: [illegible]
2nd Reviewer: AMA

Validation Area	Yes	No	NA	Findings/Comments
[illegible]				
If MSA was performed, was the correlation coefficients > 0.995?			✓	
Do all applicable analysies have duplicate injections? (Level IV only)			✓	
For sample concentrations > RL, are applicable duplicate injection RSD values < 20%? (Level IV only)			✓	
Were analytical spike recoveries within the 85-115% QC limits?			✓	
[illegible]				
Was an ICP serial dilution analyzed if analyte concentrations were > 50X the MDL (ICP)/>100X the MDL(ICP/MS)?	✓			
Were all percent differences (%Ds) < 10%?	✓			
Was there evidence of negative interference? If yes, professional judgement will be used to qualify the data.			✓	
[illegible]				
Were all the percent recoveries (%R) within the 30-120% (6020)/60-125% (200.8) of the intensity of the internal standard in the associated initial calibration?	✓			
If the %Rs were outside the criteria, was a reanalysis performed?			✓	
[illegible]				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
[illegible]				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
[illegible]				
Overall assessment of data was found to be acceptable.	✓			
[illegible]				
Field duplicate pairs were identified in this SDG.	✓			
Target analytes were detected in the field duplicates.	✓			
[illegible]				
Field blanks were identified in this SDG.		✓		
Target analytes were detected in the field blanks.			✓	

LDC #: 21494B4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Page: 1 of 1
Reviewer: [illegible]
2nd reviewer: [illegible]

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-11	Aq	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, CN^-, ___ ___
		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, CN^-, ___ ___
12-19	Aq	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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
Analysis Method		
ICP		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, CN^-, ___ ___
ICP Trace		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, CN^-, ___ ___
ICP-MS		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, CN^-, ___ ___
GFAA		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, CN^-,

Comments: Mercury by CVAA if performed

ELEMENTS.4

LDC #: 21494A4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Page: 1 of 1
Reviewer: MM
2nd Reviewer: [illegible]

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".

(Y) N N/A Was a matrix spike analyzed for each matrix in this SDG?

Y (N) N/A 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.

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

LEVEL IV ONLY:

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

#	MS/MSD ID	Matrix	Analyte	MS %Recovery	MSD %Recovery	RPD (Limits)	Associated Samples	Qualifications
1	(8/19	Aq	As		132		~~All~~ 9	J+ UT/A (m)

Comments: ~~Post~~ ~~Post~~ #9 u.t from Aqua

MSD.4S2

LDC#: 21494H4
SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer:
2nd Reviewer: GM

METHOD: Metals (EPA Method 6020)

Y N NA Were field duplicate pairs identified in this SDG?
Y N NA Were target analytes detected in the field duplicate pairs?

Compound	Concentration (ug/L)		(≤30) RPD	(ug/L) Difference	(ug/L) Limits	Qualifications (Parent Only)
	8	10				
Arsenic	120	120		0	(≤50)	

Compound	Concentration (ug/L)		(≤30) RPD	(ug/L) Difference	(ug/L) Limits	Qualifications (Parent Only)
	9	11				
Arsenic	110	120		10	(≤50)	

LDC #: 14994

SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Initial and Continuing Calibration Calculation Verification

Reviewer: MH

2nd Reviewer: [illegible]

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

An initial and continuing calibration verification percent recovery (%R) was recalculated for each type of analysis using the following formula:

%R = Found x 100 / True

Where, Found = concentration (in ug/L) of each analyte measured in the analysis of the ICV or CCV solution
True = concentration (in ug/L) of each analyte in the ICV or CCV source

Standard ID	Type of Analysis	Element	Found (ug/L)	True (ug/L)	Recalculated %R	Reported %R	Acceptable (Y/N)
ICV	ICP (Initial calibration)	Ag	39.9	40	98.2	98.2	Y
	GFAA (Initial calibration)						
	CVAA (Initial calibration)						
CCV	ICP (Continuing calibration)	Se	49.2	50	98.4	98.4	Y
	GFAA (Continuing calibration)						
	CVAA (Continuing calibration)						
	ICP/MS (Initial calibration)						
	ICP/MS (Continuing calibation)						

Comments: Refer to Calibration Verification findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 14944H4
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

Page: 1 of 1
Reviewer: [illegible]
2nd Reviewer: [illegible]

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

Percent recoveries (%R) for an ICP interference check sample, a laboratory control sample and a matrix spike sample were recalculated using the following formula:

$\%R = \frac{Found}{True} \times 100$ Where, Found = Concentration of each analyte measured in the analysis of the sample. For the matrix spike calculation, Found = SSR (spiked sample result) - SR (sample result).
True = Concentration of each analyte in the source.

A sample and duplicate relative percent difference (RPD) was recalculated using the following formula:

$RPD = \frac{|S-D|}{(S+D)/2} \times 100$ Where, S = Original sample concentration
D = Duplicate sample concentration

An ICP serial dilution percent difference (%D) was recalculated using the following formula:

$\%D = \frac{|I-SDR|}{I} \times 100$ Where, I = Initial Sample Result (mg/L)
SDR = Serial Dilution Result (mg/L) (Instrument Reading x 5)

Sample ID	Type of Analysis	Element	Found / S / I (units)	True / D / SDR (units)	Recalculated %R / RPD / %D	Reported %R / RPD / %D	Acceptable (Y/N)
ICSAB	ICP interference check	Ag	103.1	100	103.1	103.1	Y
LCS	Laboratory control sample	Se	38.31	40.0	96	96	
1S	Matrix spike	Ag	(SSR-SR) 38.7	40.0	97	97	
1S/13	Duplicate	Se	48.2	39.8	19	19	
1	ICP serial dilution	Ag	5.9	6.18	4.5	4.6	

Comments: Refer to appropriate worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21494H4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
Reviewer: VV
2nd reviewer: N/A

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".

Y N N/A Have results been reported and calculated correctly?
Y N N/A Are results within the calibrated range of the instruments and within the linear range of the ICP?
Y N N/A Are all detection limits below the CRDL?

Detected analyte results for 1, 2 were recalculated and verified using the following equation:

Concentration = $\frac{(RD)(FV)(Dil)}{(In.\ Vol.)(\%S)}$

RD = Raw data concentration
FV = Final volume (ml)
In. Vol. = Initial volume (ml) or weight (G)
Dil = Dilution factor
%S = Decimal percent solids

Recalculation:

Ag = 6.18 µg/L × 10 = 61.8 µg/L

Sample ID	Analyte	Reported Concentration (µg/L)	Calculated Concentration (µg/L)	Acceptable (Y/N)
1	Ag	62	62	Y
		~		
2	Ag	57 59	59	Y

RECALC.4S2

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 29 through July 1, 2009

LDC Report Date: September 14, 2009

Matrix: Water

Parameters: Metals

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304609

Sample Identification

M-111AB
M-110AB
M-110ABDISS
I-ARB
M-25B
M-12AB
M-12ABDISS
M-110ABMS
M-110ABMSD
M-12ABDISSMS
M-12ABDISSMSD

Introduction

This data review covers 11 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Metals. The metals analyzed were Arsenic and Selenium.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and 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.

Blanks are summarized in Section IV.

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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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. ICPMS Tune

The mass calibration was within 0.1 AMU and the percent relative standard deviation (%RSD) was less than or equal to 5% .

III. Calibration

An initial calibration was performed.

The frequency and analysis criteria of the initial calibration verification (ICV) and continuing calibration verification (CCV) were met.

IV. 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.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. 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
M-110ABMS/MSD (M-110AB)	Selenium	-	126 (75-125)	-	J+ (all detects)	A
M-12ABDISSMS/MSD (M-12ABDISS)	Selenium	130 (75-125)	130 (75-125)	-	J+ (all detects)	A

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

Raw data were not reviewed for this SDG.

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met.

XII. Sample Result Verification and Project Quantitation Limit

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304609	All analytes reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Data Qualification Summary - SDG 8304609

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
8304609	M-110AB M-12ABDISS	Selenium	J+ (all detects)	A	Matrix spike/Matrix spike duplicates (%R) (m)
8304609	M-111AB M-110AB M-110ABDISS I-ARB M-25B M-12AB M-12ABDISS	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Laboratory Blank Data Qualification Summary - SDG 8304609

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Field Blank Data Qualification Summary - SDG 8304609

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494I4
SDG #: 8304609
Laboratory: Test America

Date: 9/14/09
Page: 1 of 1
Reviewer: ~
2nd Reviewer: AMA

METHOD: As & Se (EPA SW 846 Method 6020)

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: 6/29/09 - 7/01/09
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	SW	3MS/MSD
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	N	Not reviewed
X.	Furnace Atomic Absorption QC	N	Not Method
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
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: A2

1	M-111AB	11	M-12ABDISSMSD	21	LMB	31	
2	M-110AB	12		22		32	
3	M-110ABDISS	13		23		33	
4	I-ARB	14		24		34	
5	M-25B	15		25		35	
6	M-12AB	16		26		36	
7	M-12ABDISS	17		27		37	
8	M-110ABMS	18		28		38	
9	M-110ABMSD	19		29		39	
10	M-12ABDISSMS	20		30		40	

Notes: _____

LDC #: 21494A4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Page: 1 of 1
Reviewer: [illegible]
2nd reviewer: qmk

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-7	Aq	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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
8-11	Aq	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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
		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, CN$^-$, ___ ___
Analysis Method		
ICP		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, CN$^-$, ___ ___
ICP Trace		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, CN$^-$, ___ ___
ICP-MS		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, CN$^-$, ___ ___
GFAA		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, CN$^-$,

Comments: Mercury by CVAA if performed

ELEMENTS.4

LDC #: 21494I4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Page: 1 of 1
Reviewer: MH
2nd Reviewer: mA

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".

(Y) N N/A Was a matrix spike analyzed for each matrix in this SDG?

Y (N) N/A 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.

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

LEVEL IV ONLY:

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

#	MS/MSD ID	Matrix	Analyte	MS %Recovery	MSD %Recovery	RPD (Limits)	Associated Samples	Qualifications
1	8/9*	Aq	Se		126	✓	~~1,2,4,6~~ 2	J+/A (m)
2	10/11*	Aq	Se	130	130		~~3,7~~ 7	↓

Comments: * Parent sample is not from area 1

MSD.4S2

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 6 through July 10, 2009

LDC Report Date: September 14, 2009

Matrix: Water

Parameters: Metals

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304611

Sample Identification

M-117B
M-120B
M-103B
M-10B
M-10BDISS
M-121B
M-118B
M-117BMS
M-117BMSD
M-120BMS
M-120BMSD
M-10BDISSMS
M-10BDISSMSD

Introduction

This data review covers 13 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Metals. The metals analyzed were Arsenic and Selenium.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and 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.

Blanks are summarized in Section IV.

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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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. ICPMS Tune

The mass calibration was within 0.1 AMU and the percent relative standard deviation (%RSD) was less than or equal to 5% .

III. Calibration

An initial calibration was performed.

The frequency and analysis criteria of the initial calibration verification (ICV) and continuing calibration verification (CCV) were met.

IV. 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.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. 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.

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

Raw data were not reviewed for this SDG.

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met.

XII. Sample Result Verification and Project Quantitation Limit

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304611	All analytes reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Data Qualification Summary - SDG 8304611

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
8304611	M-117B M-120B M-103B M-10B M-10BDISS M-121B M-118B	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Laboratory Blank Data Qualification Summary - SDG 8304611

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Field Blank Data Qualification Summary - SDG 8304611

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494K4
SDG #: 8304611
Laboratory: Test America

Date: 9/14/09
Page: 1 of 1
Reviewer:
2nd Reviewer:

METHOD: As & Se (EPA SW 846 Method 6020)

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: 7/6/09 - 7/10/09
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	3MS/MSD
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	N	Not required
X.	Furnace Atomic Absorption QC	N	Not analyzed
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
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:

1	M-117B	11	M-120BMSD	21	MB	31	
2	M-120B	12	M-10BDISSMS	22		32	
3	M-103B	13	M-10BDISSMSD	23		33	
4	M-10B	14		24		34	
5	M-10BDISS	15		25		35	
6	M-121B	16		26		36	
7	M-118B	17		27		37	
8	M-117BMS	18		28		38	
9	M-117BMSD	19		29		39	
10	M-120BMS	20		30		40	

Notes:

LDC #: 21494K4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Page: 1 of 2
Reviewer: [signature]
2nd reviewer: [initials]

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-7	Aq	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, CN^-, ___ ___
		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, CN^-, ___ ___
8-13	Aq	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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
		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, CN^-, ___ ___
Analysis Method		
ICP		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, CN^-, ___ ___
ICP Trace		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, CN^-, ___ ___
ICP-MS		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, CN^-, ___ ___
GFAA		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, CN^-,

Comments: Mercury by CVAA if performed

ELEMENTS.4

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 13 through July 15, 2009

LDC Report Date: September 14, 2009

Matrix: Water

Parameters: Metals

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304614

Sample Identification

H-11B
H-11BDISS
TR-8B
TR-10B
M-92B
M-92BDISS
M-97B
H-11BMS
H-11BMSD
H-11BDISSMS
H-11BDISSMSD
TR-8BMS
TR-8BMSD
M-92BMS
M-92BMSD
M-92BDISSMS
M-92BDISSMSD

Introduction

This data review covers 17 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Metals. The metals analyzed were Arsenic and Selenium.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and 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.

Blanks are summarized in Section IV.

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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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. ICPMS Tune

The mass calibration was within 0.1 AMU and the percent relative standard deviation (%RSD) was less than or equal to 5% .

III. Calibration

An initial calibration was performed.

The frequency and analysis criteria of the initial calibration verification (ICV) and continuing calibration verification (CCV) were met.

IV. 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.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. 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.

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

Raw data were not reviewed for this SDG.

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met.

XII. Sample Result Verification and Project Quantitation Limit

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304614	All analytes reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Data Qualification Summary - SDG 8304614

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
8304614	H-11B H-11BDISS TR-8B TR-10B M-92B M-92BDISS M-97B	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Laboratory Blank Data Qualification Summary - SDG 8304614

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Field Blank Data Qualification Summary - SDG 8304614

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494N4
SDG #: 8304614
Laboratory: Test America

Date: 9/14/09
Page: 1 of 1
Reviewer:
2nd Reviewer: mg

METHOD: As & Se (EPA SW 846 Method 6020)

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: 7/13/09 - 7/15/09
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	3 MS/MSD
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	N	Not reviewed
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
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: All

1	H-11B	11	H-11BDISSMSD	21	MB	31	
2	H-11BDISS	12	TR-8BMS	22		32	
3	TR-8B	13	TR-8BMSD	23		33	
4	TR-10B	14	M-92BMS	24		34	
5	M-92B	15	M-92BMSD	25		35	
6	M-92BDISS	16	M-92BDISSMS	26		36	
7	M-97B	17	M-92BDISSMSD	27		37	
8	H-11BMS	18		28		38	
9	H-11BMSD	19		29		39	
10	H-11BDISSMS	20		30		40	

Notes:

LDC #: 21494N4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Page: 1 of 1
Reviewer: ~
2nd reviewer: [illegible]

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-7	Aq	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, CN⁻, ___ ___
		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, CN⁻, ___ ___
8-14	Aq	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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
Analysis Method		
ICP		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, CN⁻, ___ ___
ICP Trace		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, CN⁻, ___ ___
ICP-MS		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, CN⁻, ___ ___
GFAA		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, CN⁻, ___ ___

Comments: Mercury by CVAA if performed

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 20 through July 24, 2009

LDC Report Date: September 14, 2009

Matrix: Water

Parameters: Metals

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304615

Sample Identification

M-77B
M-77BDISS
M-33B
CLD-4RB
MW-6RB
M-35B
M-52B
M-77BMS
M-77BMSD
M-77BDISSMS
M-77BDISSMSD
M-33BMS
M-33BMSD
CLD-4RBMS
CLD-4RBMSD

Introduction

This data review covers 15 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Metals. The metals analyzed were Arsenic and Selenium.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and 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.

Blanks are summarized in Section IV.

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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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. ICPMS Tune

The mass calibration was within 0.1 AMU and the percent relative standard deviation (%RSD) was less than or equal to 5% .

III. Calibration

An initial calibration was performed.

The frequency and analysis criteria of the initial calibration verification (ICV) and continuing calibration verification (CCV) were met.

IV. 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.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. 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
M-77BMS/MSD (M-77B)	Arsenic	73 (75-125)	70 (75-125)	-	J- (all detects) UJ (all non-detects)	A
	Selenium	-	69 (75-125)	-	J- (all detects) UJ (all non-detects)	

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

Raw data were not reviewed for this SDG.

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met.

XII. Sample Result Verification and Project Quantitation Limit

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304615	All analytes reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Data Qualification Summary - SDG 8304615

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
8304615	M-77B	Arsenic Selenium	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R) (m)
8304615	M-77B M-77BDISS M-33B CLD-4RB MW-6RB M-35B M-52B	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Laboratory Blank Data Qualification Summary - SDG 8304615

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Field Blank Data Qualification Summary - SDG 8304615

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494O4
SDG #: 8304615
Laboratory: Test America

Date: 9/14/09
Page: 1 of 1
Reviewer: ~
2nd Reviewer: AMA

METHOD: As & Se (EPA SW 846 Method 6020)

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: 7/20/09 - 7/24/09
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	SW	MS/MSD
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	N	Not reviewed
X.	Furnace Atomic Absorption QC	N	Not Weighed
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
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: All

1	M-77B	11	M-77BDISSMSD	21	MB	31	
2	M-77BDISS	12	M-33BMS	22		32	
3	M-33B	13	M-33BMSD	23		33	
4	CLD-4RB	14	CLD-4RBMS	24		34	
5	MW-6RB	15	CLD-4RBMSD	25		35	
6	M-35B	16		26		36	
7	M-52B	17		27		37	
8	M-77BMS	18		28		38	
9	M-77BMSD	19		29		39	
10	M-77BDISSMS	20		30		40	

Notes: _____

LDC #: 214940
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Page: 1 of 1
Reviewer: [signature]
2nd reviewer: [signature]

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-7	Aq	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, CN⁻, ___ ___
		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, CN⁻, ___ ___
8-15	Aq	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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
Analysis Method		
ICP		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, CN⁻, ___ ___
ICP Trace		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, CN⁻, ___ ___
ICP-MS		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, CN⁻, ___ ___
GFAA		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, CN⁻,

Comments: Mercury by CVAA if performed

ELEMENTS.4

LDC #: 21949D4
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: MM
2nd Reviewer: QM

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".

(Y) N N/A Was a matrix spike analyzed for each matrix in this SDG?

Y (N) N/A 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.

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

LEVEL IV ONLY:

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

#	MS/MSD ID	Matrix	Analyte	MS %Recovery	MSD %Recovery	RPD (Limits)	Associated Samples	Qualifications
1	8/9	A2	As	73	70		1	J-/UJ/A (MS)
			Se		69			J

Comments: _____

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 27, 2009

LDC Report Date: September 14, 2009

Matrix: Water

Parameters: Metals

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304619

Sample Identification

M-11B
M-11BDISS
M-11009B
M-11009BDISS
M-11BDISSMS
M-11BDISSMSD
M-11009BMS
M-11009BMSD

Introduction

This data review covers 8 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Metals. The metals analyzed were Arsenic and Selenium.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and 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.

Blanks are summarized in Section IV.

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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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. ICPMS Tune

The mass calibration was within 0.1 AMU and the percent relative standard deviation (%RSD) was less than or equal to 5% .

III. Calibration

An initial calibration was performed.

The frequency and analysis criteria of the initial calibration verification (ICV) and continuing calibration verification (CCV) were met.

IV. 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.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. 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.

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

Raw data were not reviewed for this SDG.

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met.

XII. Sample Result Verification and Project Quantitation Limit

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304619	All analytes reported below the PQL.	J (all detects)	A

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

Samples M-11B and M-11009B and samples M-11BDISS and M-11009BDISS were identified as field duplicates. No metals were detected in any of the samples with the following exceptions:

Analyte	Concentration (ug/L)		RPD (Limits)	Difference (Limits)	Flags	A or P
	M-11B	M-11009B				
Arsenic	220	220	0 (≤30)	-	-	-

Analyte	Concentration (ug/L)		RPD (Limits)	Difference (Limits)	Flags	A or P
	M-11BDISS	M-11009BDISS				
Arsenic	190	200	5 (≤30)	-	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Data Qualification Summary - SDG 8304619

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
8304619	M-11B M-11BDISS M-11009B M-11009BDISS	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Laboratory Blank Data Qualification Summary - SDG 8304619

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Field Blank Data Qualification Summary - SDG 8304619

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494S4
SDG #: 8304619
Laboratory: Test America

Date: 9/14/09
Page: 1 of 1
Reviewer: [illegible]
2nd Reviewer: AMA

METHOD: As & Se (EPA SW 846 Method 6020)

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: 7/29/09
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	3MS/MSD
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	N	not reviewed
X.	Furnace Atomic Absorption QC	N	not utilized
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	SW	(1,3) (2,4)
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: All

1	M-11B	11	MB	21		31	
2	M-11BDISS	12		22		32	
3	M-11009B	13		23		33	
4	M-11009BDISS	14		24		34	
5	M-11BDISSMS	15		25		35	
6	M-11BDISSMSD	16		26		36	
7	M-11009BMS	17		27		37	
8	M-11009BMSD	18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 21494S4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Page: 1 of 1
Reviewer: [illegible]
2nd reviewer: [illegible]

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-4	Aq	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, CN⁻, ___ ___
		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, CN⁻, ___ ___
ws 5-8	Aq	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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
Analysis Method		
ICP		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, CN⁻, ___ ___
ICP Trace		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, CN⁻, ___ ___
ICP-MS		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, CN⁻, ___ ___
GFAA		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, CN⁻, ___ ___

Comments: Mercury by CVAA if performed

ELEMENTS.4

LDC#: 21494S4
SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer:
2nd Reviewer:

METHOD: Metals (EPA Method 6020)

(Y) N NA Were field duplicate pairs identified in this SDG?
(Y) N NA Were target analytes detected in the field duplicate pairs?

Compound	Concentration (ug/L) 1	Concentration (ug/L) 3	(≤30) RPD	(ug/L) Difference	(ug/L) Limits	Qualifications (Parent Only)
Arsenic	220	220	0			

Compound	Concentration (ug/L) 2	Concentration (ug/L) 4	(≤30) RPD	(ug/L) Difference	(ug/L) Limits	Qualifications (Parent Only)
Arsenic	190	200	5			

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: August 3 through August 4, 2009

LDC Report Date: September 24, 2009

Matrix: Water

Parameters: Metals

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304622

Sample Identification

M-31AB
M-31ABDISS
M-50B
M-21B
FB080409-GW
M-31ABMS
M-31ABMSD
M-31ABDISSMS
M-31ABDISSMSD
M-21BMS
M-21BMSD

Introduction

This data review covers 11 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Metals. The metals analyzed were Arsenic and Selenium.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and 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.

Blanks are summarized in Section IV.

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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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. ICPMS Tune

The mass calibration was within 0.1 AMU and the percent relative standard deviation (%RSD) was less than or equal to 5% .

III. Calibration

An initial calibration was performed.

The frequency and analysis criteria of the initial calibration verification (ICV) and continuing calibration verification (CCV) were met.

IV. Blanks

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

Sample FB080409-GW was identified as a field blank. No metals contaminants were found in this blank.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. 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.

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

Raw data were not reviewed for this SDG.

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met.

XII. Sample Result Verification and Project Quantitation Limit

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304622	All analytes reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Data Qualification Summary - SDG 8304622

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
8304622	M-31AB M-31ABDISS M-50B M-21B FB080409-GW	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Laboratory Blank Data Qualification Summary - SDG 8304622

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Metals - Field Blank Data Qualification Summary - SDG 8304622

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494V4
SDG #: 8304622
Laboratory: Test America

Date: 9/14/09
Page: 1 of 1
Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: As & Se (EPA SW 846 Method 6020)

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: 8/3/09 - 8/4/09
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	} MS/MSD
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	N	Not reviewed
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	N	
XV	Field Blanks	ND	FB=5

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: All

1	M-31AB	11	M-21BMSD	21		31	
2	M-31ABDISS	12	MB	22		32	
3	M-50B	13		23		33	
4	M-21B	14		24		34	
5	FB080409GW	15		25		35	
6	M-31ABMS	16		26		36	
7	M-31ABMSD	17		27		37	
8	M-31ABDISSMS	18		28		38	
9	M-31ABDISSMSD	19		29		39	
10	M-21BMS	20		30		40	

Notes: _____

LDC #: 21494
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Page: 1 of 1
Reviewer: [illegible]
2nd reviewer: [illegible]

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-5	Aq	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, CN⁻, ___ ___
		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, CN⁻, ___ ___
~6-11	A	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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
		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, CN⁻, ___ ___
Analysis Method		
ICP		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, CN⁻, ___ ___
ICP Trace		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, CN⁻, ___ ___
ICP-MS		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, CN⁻, ___ ___
GFAA		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, CN⁻,

Comments: Mercury by CVAA if performed

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Data Validation Reports
LDC# 21494

Organophosphorus Pesticides

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: May 27 through May 28, 2009

LDC Report Date: September 18, 2009

Matrix: Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304601

Sample Identification

EB052709
MC-45B
M-127B

Introduction

This data review covers 3 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/5/09	023F1001	1	Fensulfothion	25.6	All samples in SDG 8304601	J- (all detects) UJ (all non-detects)	A
6/5/09	023F2501	2	Naled Azinphos-methyl	24.1 21.3	All samples in SDG 8304601	J+ (all detects) J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/1/09	010F1001	1	Naled	29.0	All samples in SDG 8304601	J- (all detects) UJ (all non-detects)	P
6/1/09	010F1001	2	Naled	35.8	All samples in SDG 8304601	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample EB052709 was identified as an equipment bank. No organophosphorus pesticide contaminants were found in this blank.

Sample FB060309-SO (from SDG 8304603) was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there was insufficient sample volume for analysis of the matrix spike and matrix spike duplicate.

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. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304601	All compounds reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304601

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304601	EB052709 MC-45B M-127B	Fensulfothion	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304601	EB052709 MC-45B M-127B	Naled Azinphos-methyl	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D) (c)
8304601	EB052709 MC-45B M-127B	Naled	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304601	EB052709 MC-45B M-127B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304601

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304601

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494A17
SDG #: 8304601
Laboratory: Test America

Date: 9/10/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 5/27-28/09
IIa.	Initial calibration	A	r² , %RSD
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20 %
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	Client spec
IVc.	Laboratory control samples	A	LCS/D
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	
X.	Field blanks	ND	EB = 1 ~~FB = FB~~ FB = FB060309 from 8304603

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: Water

1	EB052709	11		21		31	
2	MC-45B	12		22		32	
3	M-127B	13		23		33	
4	9153088 MB	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	

Notes:

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 21494A17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: JV6

METHOD: ✓ GC ___ HPLC

2nd Reviewer: R

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? ✓ %D or ___ RPD
(Y) N N/A Were continuing calibration standards analyzed at the required frequencies? 20
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0%~~?
Level IV Only
Y N (N/A) Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ~~≤ 15.0~~)	(≤ 20) RT (limit)	Associated Samples	Qualifications
	6/01/09	010F1001	Col. 1	~~C (+)~~	~~178.00~~	( )	All + Blk	~~J+ det/P~~ (C)
		(ICV)	↓	F (-)	29.0	( )		J-/UJ/P
			↓	~~D (-)~~	~~78.1~~	( )		~~J-/R/P~~
			Col. 2	~~C (+)~~	~~223~~	( )		~~J+ det/P~~
			↓	F (-)	35.8	( )		J-/UJ/P
			↓	~~D (-)~~	~~89.0~~	( )		~~J-/R/P~~
						( )		
						( )		
	6/05/09	023F2501	Col. 1	V (-)	25.6	( )		J-/UJ/A
		(CCV)	Col. 2	F (+)	24.1	( )		J+ det/A
			↓	Y (+)	21.3	( )	↓	↓
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		

(ICV - Ave > 20)

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 1 through June 4, 2009

LDC Report Date: September 19, 2009

Matrix: Soil

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304602

Sample Identification

RSAM3-0.5B
RSAM2-0.5B
RSAJ3-0.5B
RSAM2-0.5BMS
RSAM2-0.5BMSD

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 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/19/09	051F5101	1	Dichlorvos Azinphos-methyl	24.2 30.9	All samples in SDG 8304602	J+ (all detects) J+ (all detects)	A
6/19/09	051F5101	1	Naled Disulfoton	38.2 26.8	All samples in SDG 8304602	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A
6/19/09	051F5101	2	Naled	49.0	All samples in SDG 8304602	J- (all detects) UJ (all non-detects)	A
6/19/09	051F5101	2	Azinphos-methyl	35.3	All samples in SDG 8304602	J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/1/09	010F1001	1	Naled	29.0	All samples in SDG 8304602	J- (all detects) UJ (all non-detects)	P
6/1/09	010F1001	2	Naled	35.8	All samples in SDG 8304602	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample FB072109-SO (from SDG 8304616) was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were added to all samples and blanks as required by the method. The percent 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) were within QC limits.

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304602	All compounds reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304602

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304602	RSAM3-0.5B RSAM2-0.5B RSAJ3-0.5B	Dichlorvos Azinphos-methyl	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D) (c)
8304602	RSAM3-0.5B RSAM2-0.5B RSAJ3-0.5B	Naled Disulfoton	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304602	RSAM3-0.5B RSAM2-0.5B RSAJ3-0.5B	Naled	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304602	RSAM3-0.5B RSAM2-0.5B RSAJ3-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304602

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304602

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494B17
SDG #: 8304602
Laboratory: Test America

Date: 9/10/09
Page: 1 of 1
Reviewer: SVG
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 6/01 – 04/09
IIa.	Initial calibration	A	% RSD ≤ 20 % r✓
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20 %
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
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	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	FB = FB072109-SO from 8304616

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	~~RSAI2-0.5B~~	11	9166561 MB	21		31	
2	RSAM3-0.5B	12		22		32	
3	RSAM2-0.5B	13		23		33	
4	RSAJ3-0.5B	14		24		34	
5	RSAM2-0.5BMS	15		25		35	
6	RSAM2-0.5BMSD	16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: (#1 Not validated per list)

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. 0,0,0-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

LDC #: 21494 B17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of ___
Reviewer: JVC

2nd Reviewer: ✓

METHOD: ✓ GC ___ HPLC

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? ✓ %D or ___ RPD
Y N N/A Were continuing calibration standards analyzed at the required frequencies?
Y N N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤20~~ ≤20.0%?
Level IV Only
Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ~~≤15.0~~ ≤20.0)	RT (limit)	Associated Samples	Qualifications
	6/01/09	010F1001	Col. 1	~~C (+)~~	~~178.0~~	( )	All + Blk	~~J+ dets /P~~ (c)
		(ICV)	↓	F (-)	29.0	( )	↓	J-/UJ/P
				~~D (-)~~	~~78.1~~	( )		~~J-/R/P~~
			Col. 2	~~C (+)~~	~~223.9~~	( )		~~J+ dets /P~~
			↓	F (-)	35.8	( )		J-/UJ/P
				~~D (-)~~	~~89.0~~	( )		~~J-/R/P~~
						( )		
						( )		
	6/19/09	051F5101	Col. 1	A (+)	24.2	( )		J+ dets /A
		(CCV)	↓	F (-)	38.2	( )		J-/UJ/A
				K (-)	26.8	( )		↓
			↓	Y (+)	30.9	( )		J+ dets /A
			Col. 2	F (-)	49.0	( )		J-/UJ/A
			↓	Y (+)	35.3	( )	✓	J+ dets /A
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		

(ICV - Ave > 20)

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 1 through June 5, 2009

LDC Report Date: October 6, 2009

Matrix: Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304603

Sample Identification

M-7BB
M-5AB
FB060309
M-23B
M-23009B
PC-40B
PC-40BRE
PC-4009B
PC-4009BRE

Introduction

This data review covers 9 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 with the following exceptions:

Sample	Analyte	Total Days From Sample Collection Until Analysis	Required Holding Time (in Days) From Sample Collection Until Analysis	Flag	A or P
PC-40BRE PC-4009BRE	All TCL compounds	15	7	J- (all detects) R (all non-detects)	P

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/12/09	014F1401	1	Naled Azinphos-methyl	51.2 26.2	M-7BB M-5AB FB060309 M-23B M-23009B 9159499MB 9160222MB	J+ (all detects) J+ (all detects)	A

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/12/09	014F1401	2	Naled Azinphos-methyl	60.9 31.0	M-7BB M-5AB FB060309 M-23B M-23009B 9159499MB 9160222MB	J+ (all detects) J+ (all detects)	A
6/21/09	003F0301	1	Dichlorvos	34.2	PC-40B PC-4009B 9159433MB	J- (all detects) UJ (all non-detects)	A
6/21/09	003F0301	1	Naled	34.0	PC-40B PC-4009B 9159433MB	J+ (all detects)	A
6/21/09	003F0301	2	Dichlorvos Trichloronate	29.3 21.6	PC-40B PC-4009B 9159433MB	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A
6/21/09	003F0301	2	Naled	45.1	PC-40B PC-4009B 9159433MB	J+ (all detects)	A
6/17/09	003F0301	1	Dichlorvos Mevinphos	29.1 20.2	PC-40BRE PC-4009BRE 9167134MB	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A
6/17/09	003F0301	1	Naled	42.3	PC-40BRE PC-4009BRE 9167134MB	J+ (all detects)	A
6/17/09	003F0301	2	Dichlorvos	24.7	PC-40BRE PC-4009BRE 9167134MB	J- (all detects) UJ (all non-detects)	A
6/17/09	003F0301	2	Naled	50.3	PC-40BRE PC-4009BRE 9167134MB	J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/1/09	010F1001	1	Naled	29.0	All samples in SDG 8304603	J- (all detects) UJ (all non-detects)	P
6/1/09	010F1001	2	Naled	35.8	All samples in SDG 8304603	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample FB060309 was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there was insufficient sample volume for analysis of the matrix spike and matrix spike duplicate.

c. Laboratory Control Samples

Laboratory control samples were reviewed for each matrix as applicable. Although the LCSD percent recoveries (%R) and the LCS/LCSD 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.

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304603	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

*VIII. Overall Assessment of Data

The overall assessment of data was acceptable. In the case where more than one result was reported for an individual sample, the least technically acceptable results were rejected as follows:

Sample	Compound	*Flag	A or P
PC-40BRE PC-4009BRE	All TCL compounds	X	A

*Corrected Flag in above table from "R" to "X".

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

IX. Field Duplicates

Samples M-23B and M-23009B, samples PC-40B and PC-4009B, and samples PC-40BRE and PC-4009BRE were identified as field duplicates. No organophosphorus pesticides were detected in any of the samples.

*Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organophosphorus Pesticides - Data Qualification Summary - SDG 8304603

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304603	PC-40BRE PC-4009BRE	All TCL compounds	J- (all detects) R (all non-detects)	P	Technical holding times (h)
8304603	M-7BB M-5AB FB060309 M-23B M-23009B	Naled Azinphos-methyl	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D) (c)
8304603	PC-40B PC-4009B PC-40BRE PC-4009BRE	Naled	J+ (all detects)	A	Continuing calibration (%D) (c)
8304603	PC-40B PC-4009B	Dichlorvos Trichloronate	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304603	PC-40BRE PC-4009BRE	Dichlorvos Mevinphos	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304603	M-7BB M-5AB FB060309 M-23B M-23009B PC-40B PC-40BRE PC-4009B PC-4009BRE	Naled	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304603	M-7BB M-5AB FB060309 M-23B M-23009B PC-40B PC-40BRE PC-4009B PC-4009BRE	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)
*8304603	PC-40BRE PC-4009BRE	All TCL compounds	*X	A	Overall assessment of data (0)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304603

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304603

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494C17
SDG #: 8304603
Laboratory: Test America

Date: 9/10/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [signature]

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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	SW	Sampling dates: 6/~~30~~-01-05/09
IIa.	Initial calibration	A	%RSD ≤ 20% r
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	Client spec (insufficient sample)
IVc.	Laboratory control samples	SW	LCS/D
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	SW	
IX.	Field duplicates	ND	D_1 = 4, 5 D_2 = 6, 8 D_7 = 7, 9
X.	Field blanks	ND	FB = 3

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: Water

1 1	M-7BB	11 1	9159499 MB	21		31	
2 ~~7~~	M-5AB	12 ~~7~~	9160222 MB	22		32	
3 ~~7~~	FB060309	13 3	9159433 MB	23		33	
4 ~~7~~	M-23B D_1	14 4	9167134 MB	24		34	
5 ~~7~~	M-23009B D_1	15		25		35	
6 3	PC-40B D_7	16		26		36	
7 4	PC-40BRE D_3	17		27		37	
8 3	PC-4009B D_7	18		28		38	
9 4	PC-4009BRE D_3	19		29		39	
10		20		30		40	

Notes: _____

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 21494C17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Technical Holding Times

Reviewer: JVG
2nd Reviewer: [illegible]

All circled dates have exceeded the technical holding times.
(Y) N N/A Were all cooler temperatures within validation criteria?

METHOD: / GC ___ HPLC

Sample ID	Matrix	Preserved	Sampling Date	(Extraction date)	Analysis date	Total # of Days	Qualifier
7, 9	W	N	6/01/09	6/16/09	6/17/09	15	J-/R/P (h)

TECHNICAL HOLDING TIME CRITERIA

VOLATILES:
- Water unpreserved: Aromatic within 7 days, non-aromatic within 14 days of sample collection.
- Water preserved: Both within 14 days of sample collection.
- Soils: Both within 14 days of sample collection.

EXTRACTABLES:
- Water: Extracted within 7 days, analyzed within 40 days.
- Soil: Extracted within 14 days, analyzed within 40 days.

LDC #: 21494
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Reviewer: JVG
2nd Reviewer: ℓ

METHOD: ✓ GC __ HPLC

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? ✓ %D or __ RPD

Y N N/A — Were continuing calibration standards analyzed at the required frequencies? (Y circled)
Y N N/A — Did the continuing calibration standards meet the %D / RPD validation criteria of ≤20.0%? (N circled)

Level IV Only
Y N N/A — Were the retention times for all calibrated compounds within their respective acceptance windows? (N/A circled)

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ ~~15.0~~ ≤20%)	RT (limit)	Associated Samples	Qualifications
(Art 720)	6/01/09	010F1001	Col. 1	~~C (+)~~	~~178.0~~	( )	All + Blks	~~J+ dets / P~~ (C)
		(ICV)	↓	F (-)	29.0	( )	↓	J- / UJ / P
			↓	~~D (-)~~	~~78.1~~	( )	↓	~~J- / R / P~~
			Col. 2	~~C (+)~~	~~223.9~~	( )	↓	~~J+ dets / P~~
			↓	F (-)	35.8	( )	↓	J- / UJ / P
			↓	~~D (-)~~	~~89.0~~	( )	↓	~~J- / R / P~~
						( )		
						( )		
	6/12/09	014F1401	Col. 1	F (+)	51.2	( )	1-5, 9159499 MB,	J+ dets / A
		(CCV)		Y (+)	26.2	( )	9160222 MB	↓
			Col. 2	F (+)	60.9	( )	↓	↓
				Y (+)	31.0	( )	↓	↓
						( )		
						( )		
	6/12/09	003F0301	Col. 1	A (-)	34.2	( )	6, 8, 9159433 MB	J- / UJ / A
		(CCV)		F (+)	34.0	( )	↓	J+ dets / A
			Col. 2	A (-)	29.3	( )	↓	J- / UJ / A
				F (+)	45.1	( )	↓	J+ dets / A
				BB (-)	21.6	( )	↓	J- / UJ / A
						( )		
						( )		
	6/17/09	003F0301	Col. 1	A (-)	29.1	( )	7, 9, 9167134 MB	J- / UJ / A
			↓	B (-)	20.2	( )	↓	↓
			↓	F (+)	42.3	( )	↓	J+ dets / A
			Col. 2	A (-)	24.7		↓ (~~[illegible]~~)	J- / UJ / A
				F (+)	50.3			J+ dets / A

LDC #: 21494C17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: Q

METHOD: ✓ GC __ HPLC

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

(Y) N N/A Were a laboratory control samples (LCS) and laboratory control sample duplicate (LCSD) analyzed for each matrix in this SDG?

Y (N) N/A Were the LCS percent recoveries (%R) and relative percent differences (RPD) within the QC limits?

Level IV/D Only

Y N (N/A) Was an LCS analyzed every 20 samples for each matrix or whenever a sample extraction was performed?

#	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	9159433 LCS/D	P	( )	55 (63-128)	( )	6, 8, 9159433MB	No qual (LCS/D)
		N	( )	52 (53-137)	29 (28)	↓	↓
		Y	( )	( )	39 (36)		
		BB	( )	52 (60-115)	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
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			( )	( )	( )		
			( )	( )	( )		

LDC #: 21494 C17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

Page: 1 of 1
Reviewer: JVL
2nd Reviewer: [signature]

METHOD: ✓ GC __ HPLC

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

All available information pertaining to the data were reviewed using professional judgement to compliment the determination of the overall quality of the data.

(Y) N N/A Was the overall quality and usability of the data acceptable?

#	Sample # ~~Compound Name~~	Finding	Associated Samples	Qualifications
	7, 9	outside H.T.		X R/A (O)

Comments: _____

OVRNew.wpd

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 8 through June 12, 2009

LDC Report Date: October 6, 2009

Matrix: Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304604

Sample Identification

M-44B
M-44BRE
M-6AB
M-6ABRE
M-142B

Introduction

This data review covers 5 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 with the following exceptions:

Sample	Analyte	Total Days From Sample Collection Until Analysis	Required Holding Time (in Days) From Sample Collection Until Analysis	Flag	A or P
M-44BRE	All TCL compounds	11	7	J- (all detects) UJ (all non-detects)	A
M-6ABRE	All TCL compounds	20	7	J- (all detects) R (all non-detects)	A

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/17/09	003F0301	1	Dichlorvos Mevinphos	29.1 20.2	M-44B 9162333MB	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A
6/17/09	003F0301	1	Naled	42.3	M-44B 9162333MB	J+ (all detects)	A

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/17/09	003F0301	2	Dichlorvos	24.7	M-44B 9162333MB	J- (all detects) UJ (all non-detects)	A
6/17/09	003F0301	2	Naled	50.3	M-44B 9162333MB	J+ (all detects)	A
6/24/09	027F2701	1	Fensulfothion	21.7	M-44BRE 9170431MB	J+ (all detects)	A
6/24/09	027F2701	2	Dichlorvos Thionazin Naled Demeton-S Chlorpyrifos Fenthion Tokuthion Parathion-methyl Famphur Azinphos-methyl Coumaphos	24.9 22.7 24.6 23.1 21.3 20.9 21.5 21.2 25.0 25.8 26.1	M-44BRE 9170431MB	J- (all detects) UJ (all non-detects)	A
7/2/09	003F0301	1	Phorate Naled	21.2 25.2	M-6ABRE 9181503MB	J+ (all detects) J+ (all detects)	A
7/2/09	003F0301	2	Dichlorvos Mevinphos Dimethoate Fensulfothion	21.1 45.9 49.7 44.0	M-6ABRE 9181503MB	J- (all detects) UJ (all non-detects)	A
7/2/09	003F0301	2	Naled EPN	28.9 21.2	M-6ABRE 9181503MB	J+ (all detects) J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/1/09	010F1001	1	Naled	29.0	M-44B 9162333MB	J- (all detects) UJ (all non-detects)	P
6/1/09	010F1001	2	Naled	35.8	M-44B 9162333MB	J- (all detects) UJ (all non-detects)	P
6/23/09	010F1001	1	Naled	43.3	M-44BRE 9170431MB	J- (all detects) UJ (all non-detects)	P

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/23/09	010F1001	1	Naled Malathion Merphos	43.3 25.8 24.4	M-44BRE 9170431MB	J- (all detects) UJ (all non-detects)	P
6/26/09	010F1001	1	Naled Disulfoton	40.1 20.6	M-6AB M-142B 9168145MB	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P
6/26/09	010F1001	2	Naled	47.6	M-6AB M-142B 9168145MB	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample FB060309-SO (from SDG 8304603) was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

Sample	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
9162333MB	Not specified	Triphenylphosphate Chlormefos	45 (60-154) 9.4 (49-171)	All TCL compounds	J- (all detects) R (all non-detects)	P
M-6AB	Not specified	Triphenylphosphate Chlormefos	22 (60-154) 18 (49-171)	All TCL compounds	J- (all detects) UJ (all non-detects)	A

b. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there was insufficient sample volume for analysis of the matrix spike and matrix spike duplicate.

c. Laboratory Control Samples

Laboratory control samples were reviewed for each matrix as applicable. Although the LCS percent recovery (%R) was not within QC limits for one compound, the LCSD percent recovery (%R) was within QC limits and no data were qualified.

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304604	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

*VIII. Overall Assessment of Data

The overall assessment of data was acceptable. In the case where more than one result was reported for an individual sample, the least technically acceptable results were rejected as follows:

Sample	Compound	*Flag	A or P
M-44BRE M-6ABRE	All TCL compounds	X	A

*Corrected Flag in above table from "R" to "X".

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.

*Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organophosphorus Pesticides - Data Qualification Summary - SDG 8304604

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304604	M-44BRE	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Technical holding times (h)
8304604	M-6ABRE	All TCL compounds	J- (all detects) R (all non-detects)	A	Technical holding times (h)
8304604	M-44B	Dichlorvos Mevinphos	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304604	M-44B	Naled	J+ (all detects)	A	Continuing calibration (%D) (c)
8304604	M-44BRE	Fensulfothion	J+ (all detects)	A	Continuing calibration (%D) (c)
8304604	M-44BRE	Dichlorvos Thionazin Naled Demeton-S Chlorpyrifos Fenthion Tokuthion Parathion-methyl Famphur Azinphos-methyl Coumaphos	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304604	M-6ABRE	Phorate Naled EPN	J+ (all detects) J+ (all detects) J+ (all detects)	A	Continuing calibration (%D) (c)
8304604	M-6ABRE	Dichlorvos Mevinphos Dimethoate Fensulfothion	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304604	M-44B	Naled	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304604	M-44BRE	Naled Malathion Merphos	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304604	M-6AB M-142B	Naled Disulfoton	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304604	M-6AB	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Surrogate recovery (%R) (s)
8304604	M-44B M-44BRE M-6AB M-6ABRE M-142B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)
*8304604	M-44BRE M-6ABRE	All TCL compounds	*X	A	Overall assessment of data (0)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304604

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304604

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494D17
SDG #: 8304604
Laboratory: Test America

Date: 9/10/09
Page: 1 of 1
Reviewer: SW
2nd Reviewer: [illegible]

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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	SW	Sampling dates: 6/08 - 12/09
IIa.	Initial calibration	A	%RSD ≤ 20% r²
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	SW	
IVb.	Matrix spike/Matrix spike duplicates	N	Client spec (insufficient vol.)
IVc.	Laboratory control samples	SW	LCS/D
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	SW	
IX.	Field duplicates	N	
X.	Field blanks	ND	FB = FB060309 from 8304603

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: Water

1 1	M-44B	11 1	9162333 MB	21		31	
2 2	M-44BRE	12 2	9170431 MB	22		32	
3 3	M-6AB	13 3	9168145 MB	23		33	
4 4	M-6ABRE	14 4	9181503 MB	24		34	
5 5	M-142B	15	9W	25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 21494D17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Technical Holding Times

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [illegible]

All circled dates have exceeded the technical holding times.
Y / N / N/A Were all cooler temperatures within validation criteria?

METHOD: / GC ___ HPLC

Sample ID	Matrix	Preserved	Sampling Date	Extraction date	Analysis date	Total # of Days	Qualifier
2, 3	W	N	6/08/09	6/19/09	6/24/09	11	J- / UJ / A (h)
	↓	↓					
4	↓	↓	6/10/09	6/30/09	7/02/09	20	J- / R / A

TECHNICAL HOLDING TIME CRITERIA

VOLATILES:
- Water unpreserved: Aromatic within 7 days, non-aromatic within 14 days of sample collection.
- Water preserved: Both within 14 days of sample collection.
- Soils: Both within 14 days of sample collection.

EXTRACTABLES:
- Water: Extracted within 7 days, analyzed within 40 days.
- Soil: Extracted within 14 days, analyzed within 40 days.

LDC #: 21494 D17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 3
Reviewer: JVC

METHOD: ✓ GC __ HPLC

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? ✓ %D or __ RPD

Y (N) N/A Were continuing calibration standards analyzed at the required frequencies?
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0~~ ≤20.0%?
Level IV Only
Y N (N/A) Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ~~≤15.0~~ ≤20.0)	RT (limit)	Associated Samples	Qualifications
	6/01/09	010F1001 (ICV)	Col. 1	C (+) ~~178.8~~	( )		1, 9162333MB	~~J+ dets/P~~ (C)
			↓	F (-) 29.0	( )		↓	J-/UJ/P
				~~D (-) 78.1~~	( )			~~J/R/P~~
			Col. 2	~~C (+) 223.9~~	( )			~~J+ dets/P~~
			↓	F (-) 35.8	( )			J-/UJ/P
			↓	~~D (-) 89.0~~	( )			~~J-/R/P~~
					( )			
					( )			
	6/23/09	010F1001 (ICV)	Col. 1	~~C (+) 174.8~~	( )		2, 9170431 MB	~~J+ dets/P~~
			↓	F (-) 43.3	( )		↓	J-/UJ/P
				~~D (-) 85.7~~	( )			~~J/R/P~~
			Col. 2	~~C (+) 244.6~~	( )			~~J+ dets/P~~
			↓	F (-) 43.3	( )			J-/UJ/P
				~~D (-) 99.6~~	( )			~~J/R/P~~
				N (-) 25.8	( )			J-/UJ/P
			↓	S (-) 24.4	( )		↓	↓
					( )			
					( )			
	6/17/09	003F0301 (CCV)	Col. 1	A (-) 29.1	( )		1, 9162333MB	J-/UJ/A
			↓	B (-) 20.2	( )		↓	↓
				F (+) 42.3	( )			J+ dets/A
			Col. 2	A (-) 24.7	( )			J-/UJ/A
			↓	F (+) 50.3	( )		↓	J+ dets/A ✓
					( )			

(ICV - Ave > 20)

LDC #: 21494 D17
SDG #: Eq Comp

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 2 of 3
Reviewer: JV6

METHOD: ___ GC ___ HPLC

2nd Reviewer: [illegible]

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? ✓ %D or ___ RPD

Y N N/A Were continuing calibration standards analyzed at the required frequencies? 20
Y N N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0%~~ ≤20%?
~~Level~~ IV Only
Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ ~~15.0~~ 20%)	RT (limit)	Associated Samples	Qualifications
	6/24/09	027 F2701 (CCV)	Col. 1	V (+)	21.7	( )	2, 9170431 MB	J+ A03 / A (C)
			Col. 2	A (-)	24.9	( )		J- / UJ / A
				JJ (-)	22.7	( )		
				F (-)	24.6	( )		
				D (-)	23.1	( )		
				O (-)	21.3	( )		
				P (-)	20.9	( )		
				U (-)	21.5	( )		
				L (-)	21.2	( )		
				MM (-)	25.0	( )		
				Y (-)	25.8	( )		
				Z (-)	26.1	( )		
						( )		
	6/26/09	010 F1001 (ICV)	Col. 1	~~C (+)~~	~~187.8~~	( )	~~3~~ 5, 9168145 MB	~~J+ A03 / P~~
				F (-)	40.1	( )		J- / UJ / P
				~~D (-)~~	~~83.7~~	( )		~~J- / R / P~~
				K (-)	20.6	( )		J- / UJ / P
			Col. 2	~~C (+)~~	~~215.0~~	( )		~~J+ A03 / P~~
				F (-)	47.6	( )		J- / UJ / A
				~~D (-)~~	~~85.2~~	( )		~~J- / R / P~~
						( )		
						( )		
	~~6/30/09~~	~~016 F1601 (CCV)~~	Please	See	next page	( )		
						( )		

LDC #: 21494 D17
SDG #: Sa Carry

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 3 of 3
Reviewer: JV6

METHOD: ✓ GC __ HPLC

2nd Reviewer: 2

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? __%D or ✓ RPD
Y N N/A Were continuing calibration standards analyzed at the required frequencies? 20
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ≤15.0%?
Level IV Only
Y N (N/A) Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ 15.0)	RT (limit)	Associated Samples	Qualifications
	7/02/09	003F0301	Col. 1	H (+)	21.2	( )	1, 918503 MB	J+ dets/A (C)
			↓	F (+)	25.2	( )		↓
			Col. 2	A (-)	21.1	( )		J-/NJ/A
				B (-)	45.9	( )		↓
				F (+)	28.9	( )		J+ dets/A
				I (-)	49.7	( )		J-/NJ/A
				V (-)	44.0	( )		↓
			↓	X (+)	21.2	( )	↓	J+ dets/A
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
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LDC #: 21494D17
SDG #: See Cover

VALIDATION FINDINDS WORKSHEET
Surrogate Recovery

Page: 1 of 1
Reviewer: VC
2nd Reviewer: [illegible]

METHOD: ✓ GC ___ HPLC
Are surrogates required by the method? Yes ✓ or No ___.
Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
(Y) N N/A Were surrogates spiked into all samples and blanks?
Y (N) N/A Did all surrogate recoveries (%R) meet the QC limits?

#	Sample ID	Detector/ Column	Surrogate Compound	%R (Limits)	Qualifications
	9162333 MB	Not specified	X	45 (60-154)	J-/R/P (S)
			Z	9.4 (49-171)	
				( )	
				( )	
	3		X	22 ( )	J-/UJ/A
			Z	18 ( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

	Surrogate Compound		Surrogate Compound		Surrogate Compound		Surrogate Compound		
A	Chlorobenzene (CBZ)	G	Octacosane	M	Benzo(e)Pyrene	S	1-Chloro-3-Nitrobenzene	Y	Tetrachloro-m- xylene
B	4-Bromofluorobenzene (BFB)	H	Ortho-Terphenyl	N	Terphenyl-D14	T	3,4-Dinitrotoluene	Z	Chlormefos
C	a,a,a-Trifluorotoluene	I	Fluorobenzene (FBZ)	O	Decachlorobiphenyl (DCB)	U	Tripentyltin		
D	Bromochlorobenene	J	n-Triacontane	P	1-methylnaphthalene	V	Tri-n-propyltin		
E	1,4-Dichlorobutane	K	Hexacosane	Q	Dichlorophenyl Acetic Acid (DCAA)	W	Tributyl Phosphate		
F	1,4-Difluorobenzene (DFB)	L	Bromobenzene	R	4-Nitrophenol	X	Triphenyl Phosphate		

LDC #: 21494D17
SDG #: Su Cary

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [illegible]

METHOD: ✓ GC __ HPLC

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

(Y) N N/A Were a laboratory control samples (LCS) and laboratory control sample duplicate (LCSD) analyzed for each matrix in this SDG?
Y (N) N/A Were the LCS percent recoveries (%R) and relative percent differences (RPD) within the QC limits?

Level ~~IV/~~D Only
Y N (N/A) Was an LCS analyzed every 20 samples for each matrix or whenever a sample extraction was performed?

#	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	9162333 LCS/D	P	58 (63-128)	( )	( )	1, 9162333 MB	No qual (LCSD in)
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		

LDC #: 21494 D17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

Reviewer: JV6
2nd Reviewer: [signature]

METHOD: __GC __HPLC

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

All available information pertaining to the data were reviewed using professional judgement to compliment the determination of the overall quality of the data.

Y N N/A Was the overall quality and usability of the data acceptable?

#	Sample ID / Compound Name	Finding	Associated Samples	Qualifications
	2, 4	Outside H.T.	-	X R/A (o)

Comments: _____

OVRNew.wpd

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 10 through June 11, 2009

LDC Report Date: September 18, 2009

Matrix: Soil

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304605

Sample Identification

SA35-0.5B
SA176-0.5B
SA166-0.5B
SA182-0.5B

Introduction

This data review covers 4 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/19/09	051F5101	1	Dichlorvos Azinphos-methyl	24.2 30.9	All samples in SDG 8304605	J+ (all detects) J+ (all detects)	A
6/19/09	051F5101	1	Naled Disulfoton	38.2 26.8	All samples in SDG 8304605	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A
6/19/09	051F5101	2	Naled	49.0	All samples in SDG 8304605	J- (all detects) UJ (all non-detects)	A
6/19/09	051F5101	2	Azinphos-methyl	35.3	All samples in SDG 8304605	J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/1/09	010F1001	1	Naled	29.0	All samples in SDG 8304605	J- (all detects) UJ (all non-detects)	P
6/1/09	010F1001	2	Naled	35.8	All samples in SDG 8304605	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample FB072109-SO (from SDG 8304616) was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there was insufficient sample volume for analysis of the matrix spike and matrix spike duplicate.

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. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304605	All compounds reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304605

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304605	SA35-0.5B SA176-0.5B SA166-0.5B SA182-0.5B	Dichlorvos Azinphos-methyl	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D) (c)
8304605	SA35-0.5B SA176-0.5B SA166-0.5B SA182-0.5B	Naled Disulfoton	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304605	SA35-0.5B SA176-0.5B SA166-0.5B SA182-0.5B	Naled	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304605	SA35-0.5B SA176-0.5B SA166-0.5B SA182-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304605

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304605

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494E17
SDG #: 8304605
Laboratory: Test America

Date: 9/11/09
Page: 1 of 1
Reviewer: JW
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 6/10-11/09
IIa.	Initial calibration	A	%RSD ≤ 20% r²
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	RSAM2-0.5B (from 8304607)
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	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	FB = FB072109-SO (from 8304616)

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

Validated Samples: Soil

1	SA35-0.5B	11		21		31	
2	SA176-0.5B	12		22		32	
3	SA166-0.5B	13		23		33	
4	SA182-0.5B	14		24		34	
5	9166561 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:

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 21494E17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of ___
Reviewer: JVG

METHOD: ✓ GC ___ HPLC

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? ✓ %D or ___ RPD

Y N N/A Were continuing calibration standards analyzed at the required frequencies?
Y N N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤20~~ ≤20.0%?
Level IV Only
Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ~~≤15.0~~ ≤20.0)	RT (limit)	Associated Samples	Qualifications
	6/01/09	010F1001	Col. 1	~~C (+)~~	~~178.0~~	( )	All + Blk	~~J+ dets /P~~ (C)
		(ICV)		F (-)	29.0	( )		J-/UJ/P
				~~D (-)~~	~~78.1~~	( )		~~J-/R/P~~
			Col. 2	~~C (+)~~	~~223.9~~	( )		~~J+ dets/P~~
				F (-)	35.8	( )		J-/UJ/P
				~~D (-)~~	~~89.0~~	( )		~~J-/R/P~~
						( )		
						( )		
						( )		
	6/9/09	051F5101	Col. 1	A (+)	24.2	( )		J+ dets/A
		(CCV)		F (-)	38.2	( )		J-/UJ/A
				K (-)	26.8	( )		J-/UJ/A
				Y (+)	30.9	( )		J+ dets/A
			Col. 2	F (-)	49.0	( )		J-/UJ/A
				Y (+)	35.0[3]	( )		J+ dets/A
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		

(ICV - Ave > 20)

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 16 through July 19, 2009

LDC Report Date: October 6, 2009

Matrix: Soil

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304606

Sample Identification

SA85-0.5B
SA92-0.5B
SA86-0.5B
SA86-0.5BRE
SA129-0.5B
SA129-0.5BRE
SA85-0.5BMS
SA85-0.5BMSD
SA86-0.5BMS
SA86-0.5BMSD

Introduction

This data review covers 10 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 with the following exceptions:

Sample	Analyte	Total Days From Sample Collection Until Analysis	Required Holding Time (in Days) From Sample Collection Until Analysis	Flag	A or P
SA86-0.5BRE	All TCL compounds	20	14	J- (all detects) UJ (all non-detects)	A
SA129-0.5BRE	All TCL compounds	19	14	J- (all detects) UJ (all non-detects)	A

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
7/3/09	019F1901	1	Mevinphos Fensulfothion Azinphos-methyl	22.3 22.9 25.9	SA86-0.5B SA129-0.5B SA86-0.5BMS SA86-0.5BMSD 9175172MB	J- (all detects) UJ (all non-detects)	A

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
7/3/09	019F1901	1	Merphos	27.1	SA86-0.5B SA129-0.5B SA86-0.5BMS SA86-0.5BMSD 9175172MB	J+ (all detects)	A
7/3/09	019F1901	2	Mevinphos Dimethoate Fensulfothion Azinphos-methyl Coumaphos	55.8 57.8 59.4 23.1 20.8	SA86-0.5B SA129-0.5B SA86-0.5BMS SA86-0.5BMSD 9175172MB	J- (all detects) UJ (all non-detects)	A
7/3/09	019F1901	2	Naled	25.6	SA86-0.5B SA86-0.5BRE SA129-0.5B SA86-0.5BMS SA86-0.5BMSD 9175172MB	J+ (all detects)	A
7/13/09	003F0301	1	Naled	33.1	SA86-0.5BRE SA129-0.5BRE 9189494MB	J+ (all detects)	A
7/13/09	003F0301	2	Naled	24.7	SA86-0.5BRE SA129-0.5BRE 9189494MB	J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/23/09	010F1001	1	Naled	43.3	SA85-0.5B SA92-0.5B SA85-0.5BMS SA85-0.5BMSD 9170419MB	J- (all detects) UJ (all non-detects)	P
6/23/09	010F1001	1	Naled Malathion Merphos	43.3 25.8 24.4	SA85-0.5B SA92-0.5B SA85-0.5BMS SA85-0.5BMSD 9170419MB	J- (all detects) UJ (all non-detects)	P

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/26/09	010F1001	1	Naled Disulfoton	40.1 20.6	SA86-0.5B SA86-0.5BRE SA129-0.5B SA129-0.5BRE SA86-0.5BMS SA86-0.5BMSD 9175172MB 9189494MB	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P
6/26/09	010F1001	2	Naled	47.6	SA86-0.5B SA86-0.5BRE SA129-0.5B SA129-0.5BRE SA86-0.5BMS SA86-0.5BMSD 9175172MB 9189494MB	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample FB072109-SO (from SDG 8304616) was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

Sample	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
SA129-0.5B	Not specified	Triphenylphosphate	28 (47-161)	All TCL compounds	J- (all detects) UJ (all non-detects)	A

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 with the following exceptions:

Spike ID (Associated Samples)	Compound	MS (%R) (Limits)	MSD (%R) (Limits)	RPD (Limits)	Flag	A or P
SA86-0.5BMS/MSD (SA86-0.5B)	Dimethoate	0 (10-156)	0 (10-156)	-	J- (all detects) R (all non-detects)	A

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 with the following exceptions:

LCS ID (Associated Samples)	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
9175172LCS (SA86-0.5B SA129-0.5B 9175172MB)	Dimethoate	0 (10-156)	-	-	J- (all detects) R (all non-detects)	P

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304606	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

*VIII. Overall Assessment of Data

The overall assessment of data was acceptable. In the case where more than one result was reported for an individual sample, the least technically acceptable results were rejected as follows:

Sample	Compound	*Flag	A or P
SA86-0.5B SA129-0.5B	Dimethoate	X	A
SA86-0.5BRE SA129-0.5BRE	All TCL compounds except Dimethoate	X	A

*Corrected Flag in above table from "R" to "X".

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.

*Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organophosphorus Pesticides - Data Qualification Summary - SDG 8304606

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304606	SA86-0.5BRE SA129-0.5BRE	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Technical holding times (h)
8304606	SA86-0.5B SA129-0.5B	Merphos	J+ (all detects)	A	Continuing calibration (%D) (c)
8304606	SA86-0.5B SA129-0.5B	Mevinphos Dimethoate Fensulfothion Azinphos-methyl Coumaphos	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304606	SA86-0.5B SA129-0.5B SA86-0.5BRE SA129-0.5BRE	Naled	J+ (all detects)	A	Continuing calibration (%D) (c)
8304606	SA85-0.5B SA92-0.5B	Naled Malathion Merphos	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304606	SA86-0.5B SA86-0.5BRE SA129-0.5B SA129-0.5BRE	Naled Disulfoton	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304606	SA129-0.5B	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Surrogate recovery (%R) (s)
8304606	SA86-0.5B	Dimethoate	J- (all detects) R (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R) (m)
8304606	SA86-0.5B SA129-0.5B	Dimethoate	J- (all detects) R (all non-detects)	P	Laboratory control samples (%R) (l)
8304606	SA85-0.5B SA92-0.5B SA86-0.5B SA86-0.5BRE SA129-0.5B SA129-0.5BRE	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)
*8304606	SA86-0.5B SA129-0.5B	Dimethoate	*X	A	Overall assessment of data (0)

SDG	Sample	Compound	Flag	A or P	Reason (Code)
*8304606	SA86-0.5BRE SA129-0.5BRE	All TCL compounds except Dimethoate	*X	A	Overall assessment of data (0)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304606

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304606

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494F17
SDG #: 8304606
Laboratory: Test America

Date: 9/15/09
Page: 1 of 1
Reviewer: JV
2nd Reviewer: [signature]

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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	SW	Sampling dates: 6/6 - 19/09
IIa.	Initial calibration	A	%RSD ≤ 20 r²
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20 %
III.	Blanks	A	
IVa.	Surrogate recovery	SW	
IVb.	Matrix spike/Matrix spike duplicates	SW	
IVc.	Laboratory control samples	SW	LCS/D
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	SW	
IX.	Field duplicates	N	
X.	Field blanks	ND	FB = FB07 2109-SO from 8304616

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	SA85-0.5B	11	9170419 MB	21		31	
2	SA92-0.5B	12	9175172 MB	22		32	
3	SA86-0.5B	13	9189494 MB	23		33	
4	SA86-0.5BRE	14		24		34	
5	SA129-0.5B	15		25		35	
6	SA129-0.5BRE	16		26		36	
7	SA85-0.5BMS	17		27		37	
8	SA85-0.5BMSD	18		28		38	
9	SA86-0.5BMS	19		29		39	
10	SA86-0.5BMSD	20		30		40	

Notes:

VALIDATION FINDINGS WORKSHEET

METHOD: ___/___GC ___HPLC

8310	8330	8151	8141	8141(Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,I)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes:_____

cmpd_list.wpd

LDC #: 21494F17
SDG #: Sw Conv

VALIDATION FINDINGS WORKSHEET
Technical Holding Times

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [illegible]

All circled dates have exceeded the technical holding times.
(Y) N N/A Were all cooler temperatures within validation criteria?

METHOD: ✓ GC ___ HPLC

Sample ID	Matrix	Preserved	Sampling Date	Extraction date	Analysis date	Total # of Days	Qualifier
4	S	N	6/18/09	7/08/09	7/13/09	20	J-/UJ/A (h)
6	↓	↓	6/19/09	↓	7/13/09	19	↓ ↓

TECHNICAL HOLDING TIME CRITERIA

VOLATILES:
- Water unpreserved: Aromatic within 7 days, non-aromatic within 14 days of sample collection.
- Water preserved: Both within 14 days of sample collection.
- Soils: Both within 14 days of sample collection.

EXTRACTABLES:
- Water: Extracted within 7 days, analyzed within 40 days.
- Soil: Extracted within 14 days, analyzed within 40 days.

LDC #: 21494 F17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 4
Reviewer: JVG
2nd Reviewer:

METHOD: ✓ GC __ HPLC

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? ✓ %D or __ RPD
(Y) N N/A Were continuing calibration standards analyzed at the required frequencies? 20
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0%~~ ≤20 ?
Level IV Only
Y N (N/A) Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ~~≤15.0~~ ≤20)	RT (limit)	Associated Samples	Qualifications
	6/23/09	010F1001 (1CV)	Col. 1	~~C (+)~~	~~174.8~~	( )	1, 2, 7, 8, 9170419 MB	~~J+/UJ/P~~ (C)
				F (-)	43.3	( )		J-/UJ/P
				~~D (-)~~	~~85.7~~	( )		~~J+/UJ/P~~
			Col. 2	~~C (+)~~	~~244.6~~	( )		~~J+/UJ/P~~
				F (-)	43.3	( )		J-/UJ/P
				~~D (-)~~	~~99.6~~	( )		~~J+/UJ/P~~
				N (-)	25.8	( )		J-/UJ/P
				S (-)	24.4	( )		
						( )		
						( )		
	5/26/09	010F1001 (1CV)	Col. 1	~~C (+)~~	~~187.8~~	( )	3-6, 9, 10, 9175172 MB, 9189494 MB	~~J+/UJ/P~~
				F (-)	40.1	( )		J-/UJ/P
				~~D (-)~~	~~83.1~~	( )		~~J+/UJ/P~~
				K (-)	20.6	( )		J-/UJ/P
			Col. 2	~~C (+)~~	~~215.0~~	( )		~~J+/UJ/P~~
				~~F (-)~~ ok	~~47.6~~	( )		J-/UJ/P
				~~D (-)~~	~~85.2~~	( )		~~J+/UJ/P~~
						( )		
						( )		
	7/03/09	019F1901 (CCV)	Col. 1	B (-)	22.3	( )	3, 5, 9, 10, 9175172 MB	J-/UJ/A
				Y (-)	22.9	( )	(3, 5)	
				Y (-)	25.9	( )		
				S (+)	27.1	( )		J+ dets/A
						( )		

LDC #: 21494 F17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: JVC

METHOD: ✓ GC __ HPLC

2nd Reviewer: [illegible]

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? __%D or __RPD

Y N N/A Were continuing calibration standards analyzed at the required frequencies? 20

Y N N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0%~~ ≤20 ?

Level IV Only

Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ ~~15.0~~ ≤20)	RT (limit)	Associated Samples	Qualifications
	7/03/09	019F1901 (CCV)	Col. 2	B (-)	55.8	( )	3, 5, 9, 10, 9175172 MB	J- (NJ/A) (c)
				F (+)	25.6	( )		J+ (det/A)
				I (-)	57.8	( )		J- (NJ/A)
				V (-)	59.4	( )		
				Y (-)	23.1	( )		
				Z (-)	20.8	( )		
						( )		
						( )		
	7/13/09	003F0301 (CCV)	Col. 1	F (+)	33.1	( )	4, 6, 9189494 MB	J+ (det/A)
			Col. 2	F (+)	24.7	( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		

LDC #: 21494 F17
SDG #: Eu Lmer

VALIDATION FINDINDS WORKSHEET
Surrogate Recovery

Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

METHOD: ✓ GC ___ HPLC
Are surrogates required by the method? Yes ✓ or No ___.
Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
(Y) N N/A Were surrogates spiked into all samples and blanks?
Y (N) N/A Did all surrogate recoveries (%R) meet the QC limits?

#	Sample ID	Detector/ (Column)	Surrogate Compound	%R (Limits)	Qualifications
	5	Not Specified	X	28 (47-161)	J- /UJ/A (S)
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
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				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

	Surrogate Compound		Surrogate Compound		Surrogate Compound		Surrogate Compound		
A	Chlorobenzene (CBZ)	G	Octacosane	M	Benzo(e)Pyrene	S	1-Chloro-3-Nitrobenzene	Y	Tetrachloro-m- xylene
B	4-Bromofluorobenzene (BFB)	H	Ortho-Terphenyl	N	Terphenyl-D14	T	3,4-Dinitrotoluene		
C	a,a,a-Trifluorotoluene	I	Fluorobenzene (FBZ)	O	Decachlorobiphenyl (DCB)	U	Tripentyltin		
D	Bromochlorobenene	J	n-Triacontane	P	1-methylnaphthalene	V	Tri-n-propyltin		
E	1,4-Dichlorobutane	K	Hexacosane	Q	Dichlorophenyl Acetic Acid (DCAA)	W	Tributyl Phosphate		
F	1,4-Difluorobenzene (DFB)	L	Bromobenzene	R	4-Nitrophenol	X	Triphenyl Phosphate		

LDC #: 21494F17
SDG #: Sy Creek

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: JVL
2nd Reviewer: [illegible]

METHOD: ✓ GC __ HPLC

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 (N) N/A Were the MS/MSD percent recoveries (%R) and relative percent differences (RPD) within QC limits?

#	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	7/8	K	( )	( )	62 (40)	1	No qual (3 Rin)
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
	9/10	A	13 (25-147)	16 (25-147)	( )	3	No qual (4 Rin)
		I	0 (10-156)	0 (10-156)	( )		J-/R/A (m)
		E	43 (51-119)	50 (51-119)	( )		No qual. (4 Rin)
		MM	29 (33-144)	( )	39 (31)		
		V	9.3 (47-123)	11 (47-123)	( )		
		P	0 (52-115)	0 (52-115)	( )		
		B	0 (15-143)	0 (15-143)	( )		
		JJ	40 (50-124)	48 (50-124)	( )	✓	✓
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		

LDC #: 21494 F17
SDG #: See Cover

METHOD: ✓ GC __ HPLC

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

Page: 1 of 1
Reviewer: JNG
2nd Reviewer: R

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

Y N N/A Were a laboratory control samples (LCS) and laboratory control sample duplicate (LCSD) analyzed for each matrix in this SDG?

Y N N/A Were the LCS percent recoveries (%R) and relative percent differences (RPD) within the QC limits?

Level IV/D Only

Y N N/A Was an LCS analyzed every 20 samples for each matrix or whenever a sample extraction was performed?

#	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	9170419 LCS/D	I	( )	( )	104 (98)	1, 2, 9170419 MB	No qual (2 Rin)
		K	( )	( )	97 (40)	↓	↓
			( )	( )	( )		
			( )	( )	( )		
	9175172 LCS	I	D (10-156)	( )	( )	3, 5, 9175172 MB	J-/R/P (1)
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
	9189494 LCS/D	I	( )	9.0 ( )	( )	4, 6, 9189494 MB	No qual (LCSin)
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		

LDC #: 21494 F17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: R

METHOD: / GC __ HPLC

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

All available information pertaining to the data were reviewed using professional judgement to compliment the determination of the overall quality of the data.

(Y) N N/A Was the overall quality and usability of the data acceptable?

#	Compound Name	Finding	Associated Samples	Qualifications
	I	MS, MSD, LCS outside limits	3	X R/A (O)
	All except I	outside H.T.	4, 6	
	I	LCS outside limits	5	

Comments:

OVRNew.wpd

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 16 through June 19, 2009

LDC Report Date: September 18, 2009

Matrix: Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304607

Sample Identification

M-39B
M-123B
M-123009B
M-34B

Introduction

This data review covers 4 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/30/09	019F1901	1	Naled	21.6	All samples in SDG 8304607	J- (all detects) UJ (all non-detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/26/09	010F1001	1	Naled Disulfoton	40.1 20.6	All samples in SDG 8304607	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P
6/26/09	010F1001	2	Naled	47.6	All samples in SDG 8304607	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample FB060309-SO (from SDG 8304616) was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there was insufficient sample volume for analysis of the matrix spike and matrix spike duplicate.

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. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304607	All compounds reported below the PQL.	J (all detects)	A

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

Samples M-123B and M-123009B were identified as field duplicates. No organophosphorus pesticides were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304607

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304607	M-39B M-123B M-123009B M-34B	Naled	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304607	M-39B M-123B M-123009B M-34B	Naled Disulfoton	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304607	M-39B M-123B M-123009B M-34B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304607

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304607

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494G17
SDG #: 8304607
Laboratory: Test America

Date: 9/15/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 6/16 - 19/09
IIa.	Initial calibration	A	2 RSD ≤ 20 2 r2
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20 2
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	client spec (insufficient vol)
IVc.	Laboratory control samples	A	LCS/D
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D = 2, 3
X.	Field blanks	ND	FB = FB060309 from 8304603

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: Water

1	M-39B	11	9173103 MB	21		31	
2	M-123B	12		22		32	
3	M-123009B	13		23		33	
4	M-34B	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	

Notes:

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 24494 17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: JVC

METHOD: GC __ HPLC

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? ~~__~~%D or __RPD
Y N N/A Were continuing calibration standards analyzed at the required frequencies?
Y N N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0~~ ≤20%?
Level IV Only
Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ ~~15.0~~ 20)	RT (limit)	Associated Samples	Qualifications
	6/26/09	010F1001 (ICV)	Col. 1	~~G (+)~~	~~187.8~~	( )	All + Blk	~~J+ all Det/P~~
				F (-)	40.1	( )		J-/UJ/P
				~~D (-)~~	~~83.1~~	( )		~~J- All Det/P~~
				k (-)	20.6	( )		J-/UJ/P
			Col. 2	~~G (+)~~	~~21.5~~	( )		~~J+ all Det/P~~
				F (-)	47.6	( )		J-/UJ/P
				~~D (-)~~	~~85.7~~	( )	↓	~~J- all Det/P~~
						( )		
						( )		
	6/30/09	019F1901 (CCV)	Col. 1	~~F~~ (-)	21.6	( )	↓	J-/UJ/A
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 23, 2009

LDC Report Date: September 19, 2009

Matrix: Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304608

Sample Identification

M-125B
M-125BMS
M-125BMSD

Introduction

This data review covers 3 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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:

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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

Retention time windows were evaluated and considered technically acceptable.

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0%.

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/26/09	010F1001	1	Naled Disulfoton	40.1 20.6	All samples in SDG 8304608	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P
6/26/09	010F1001	2	Naled	47.6	All samples in SDG 8304608	J- (all detects) UJ (all non-detects)	P

Retention times (RT) of all compounds in the calibration standards were within QC limits.

III. Blanks

Method blanks were reviewed for each matrix as applicable. No organophosphorus pesticide 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. The percent 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) were within QC limits.

V. Target Compound Identification

All target compound identifications were within validation criteria.

VI. Project Quantitation Limit

All project quantitation limits PQLs were within validation criteria.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304608	All compounds reported below the PQL.	J (all detects)	A

VII. System Performance

The system performance was acceptable.

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304608

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304608	M-125B	Naled Disulfoton	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304608	M-125B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304608

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304608

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET

LDC #: 21494H17
SDG #: 8304608
Laboratory: Test America

Stage 2B~~B~~ 4

Date: 9/11/09
Page: 1 of 1
Reviewer: JG
2nd Reviewer: [signature]

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 6/23/09
IIa.	Initial calibration	A	%RSD ≤ 20% r²
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS ~~LCSD~~
V.	Target compound identification	~~N~~ A	
VI.	Compound Quantitation and CRQLs	~~N~~ A	
VII.	System Performance	~~N~~ A	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	FB = FB060309 from 8304603

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: Water

1	M-125B	11		21		31	
2	M-125BMS	12		22		32	
3	M-125BMSD	13		23		33	
4	9177142-MB	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	

Notes: _____

LDC #: 21494 H17
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JM
2nd Reviewer: [illegible]

Method: ✓ GC _____ HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Were all percent relative standard deviations (%RSD) ≤ 20%?	✓			
Was a curve fit used for evaluation?	✓			
Did the initial calibration meet the curve fit acceptance criteria of ≥ 0.990?	✓			
Were the RT windows properly established?	✓			
V. Continuing calibration				
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 15%.0 or percent recoveries 80-120%?	✓			
Were all the retention times within the acceptance windows?		✓		
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed for each matrix and concentration?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
VI. Surrogate spikes				
Were all surrogate %R within the QC limits?	✓			
If the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R outside of criteria?			✓	
VII. Matrix spike/Matrix spike duplicates				
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.	✓			
Was a MS/MSD analyzed every 20 samples of each matrix?	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?	✓			
VIII. Laboratory control samples				
Was an LCS analyzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?	✓			
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	

LDC #: 21494 #17
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVC
2nd Reviewer:

Validation Area	Yes	No	NA	Findings/Comments
X. Target compound identification				
Were the retention times of reported detects within the RT windows?	✓			
XI. Compound quantitation/CRQLs				
Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
XII. System performance				
System performance was found to be acceptable.	✓			
XIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
XIV. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target compounds were detected in the field duplicates.			✓	
XV. Field blanks				
Field blanks were identified in this SDG.		✓		
Target compounds were detected in the field blanks.			✓	

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 24944H17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [illegible]

METHOD: ✓ GC __ HPLC

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? ✓ %D or __ RPD

(Y) N N/A Were continuing calibration standards analyzed at the required frequencies?
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ≤~~15~~20.0%?

Level IV Only

Y N (N/A) Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ ~~15.0~~ (≤20))	RT (limit)	Associated Samples	Qualifications
	6/26/09	010F1001	Col. 1	~~C (+)~~	~~187.8~~	( )	All + Blk	~~J+/[illegible]~~ (C)
		(ICV)	↓	F (-)	40.1	( )	↓	J-/UJ/P
			↓	~~D (-)~~	~~83.1~~	( )	↓	~~J-/R/P~~
			↓	K (-)	20.6	( )	↓	J-/UJ/P
			Col. 2	~~C (+)~~	~~215.0~~	( )	↓	~~J+/[illegible]~~
			↓	F (-)	47.6	( )	↓	J-/UJ/P
			↓	~~D (-)~~	~~85.2~~	( )	↓	~~J-/R/P~~
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
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						( )		
						( )		
						( )		
						( )		

LDC #: 21494 H17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVC
2nd Reviewer: [signature]

METHOD: GC ✓ HPLC ____

The calibration Factor (CF), average CF, and percent relative standard deviation (%RSD) were recalculated for the compounds identified below using the following calculations:

CF = A/C
average CF = sum of the CF/number of standards
%RSD = 100 * (S/X)

A = Area of compound,
C = Concentration of compound,
S = Standard deviation of the CF
X = Mean of the CFs

#	Standard ID	Calibration Date	Compound	Reported CF (2 std)	Recalculated CF (2 std)	Reported Average CF (initial)	Recalculated Average CF (initial)	Reported %RSD	Recalculated %RSD
1	ICAL	6/26/09	Dichlorvos (8141-1)	1.76366	1.76369	1.74977	1.74977	7.99557	7.99566
			Phorate	1.82370	1.82370	1.81476	1.81476	5.60901	5.60922
			Malathion	See	r2	calc			
2			Dichlorvos (8141-2)	2.17503	2.17503	2.01945	2.01945	7.32345	7.32345
			Phorate	1.69691	1.69691	1.76315	1.76315	8.53946	8.53963
			Malathion	1.17724	1.17724	1.20369	1.20369	3.60449	3.60500
3									
4									

Comments: Refer to Initial Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

IS = TOCP

LDC # 21499 #17
SDG# See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVL
2nd Reviewer: [signature]

METHOD: GC EPA SW 846 Method 8141A

Parameter: Malathion

Date	Column	Compound	Y Area ratio	X Conc ratio	X^2
06/26/2009	(8141A-1)	Malathion	0.14584	0.100	
			0.29331	0.250	
			0.55883	0.500	
			0.89027	1.000	
			1.76202	1.500	
			2.36769	2.000	
			2.77727	2.500	

Regression Output:			Reported	
Constant		-0.02062	c =	-0.02066
Std Err of Y Est		0.12319		
R Squared		0.99000	r2 =	0.99783
No. of Observations		7.00000		
Degrees of Freedom		5.00000		
X Coefficient(s)	1.1388	-0.002208	a	1.14436E+000
Std Err of Coef.	0.054985	0.00		

IS = TOCP = 2.0ug/mL
LAb used weighted linear regression

LDC #: 21494H17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer: JVG
2nd Reviewer: [signature]

METHOD: GC ✓ HPLC _____

The percent difference (%D) of the initial calibration average Calibration Factors (CF) and the continuing calibration CF were recalculated for the compounds identified below using the following calculation:

% Difference = 100 * (ave. CF - CF)/ave. CF
CF = A/C

Where: ave. CF = Initial calibration average CF
CF = continuing calibration CF
A = Area of compound
C = Concentration of compound

#	Standard ID	Calibration Date	Compound	Average CF(Ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %D	Recalculated %D
1	016F1601	6/30/09	Dichlorvos (8141-1)	3.00	2.6730	2.6730	10.9	10.9
			Phorate		2.9700	2.9700	1.0	1.0
			Malathion		3.0648	3.0648	2.2	2.2
2			Dichlorvos (8141-2)		2.6533	2.6533	11.6	11.6
			Phorate		3.1758	3.1758	5.9	5.9
			Malathion	✓	3.0056	3.0056	0.2	0.2
3								
4								

Comments: Refer to Continuing Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21494 H17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Page: 1 of 1
Reviewer: JVG
2nd reviewer: [illegible]

METHOD: ___ GC ___ HPLC

The percent recoveries (%R) of surrogates were recalculated for the compounds identified below using the following calculation:

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: #1

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	
TPP	Col. 1	1.00	0.59488	77	77	0
Chlorpyrifos	↓	↓	0.76771	59	59	↓

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	

LDC #: 21494 #17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [signature]

METHOD: ✓ GC __HPLC

The percent recoveries (%R) and relative percent differences (RPD) of the matrix spike and matrix spike duplicate were recalculated for the compounds identified below using the following calculation:

%Recovery = 100 * (SSC - SC)/SA Where SSC = Spiked sample concentration SC = Sample concentration
SA = Spike added
RPD =(((SSCMS - SSCMSD} * 2) / (SSCMS + SSCMSD))*100 MS = Matrix spike MSD = Matrix spike duplicate

MS/MSD samples: 2/3

Compound	Spike Added (ug/L)		Sample Conc. (ug/L)	Spike Sample Concentration (ug/L)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	---	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											
dichlorvos (8141)	3.86	3.93	9	2.87	2.92	74	74	74	74	1.8	1.7
Malathion	↓	↓	↓	2.73	2.99	71	71	76	76	9.0	9.1

Comments: Refer to Matrix Spike/Matrix Spike Duplicates findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21494 H17
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Sample/Laboratory Control Sample Duplicate Results Verification

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [signature]

METHOD: ___ GC __HPLC

The percent recoveries (%R) and Relative Percent difference (RPD) of the laboratory control sample and laboratory control sample duplicate were recalculated for the compounds identified below using the following calculation:

% Recovery = 100* (SSC-SC)/SA
RPD = I LCS - LCSD I * 2/(LCS + LCSD)

Where: SSC = Spiked sample concentration
SA = Spike added
LCS = Laboratory control sample percent recovery
SC = Concentration
LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: 917142 LCS

Compound	Spike Added (mg/L)		Spiked Sample Concentration (ug/L)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)										
Diesel (8015)										
Benzene (8021B)										
Methane (RSK-175)										
2,4-D (8151)										
Dinoseb (8151)										
Naphthalene (8310)										
Anthracene (8310)										
HMX (8330)										
2,4,6-Trinitrotoluene (8330)										
Dichlorvos (8141)	4.00	NA	2.70	NA	68	68				
Malathion ↓	↓	↓	2.66	↓	66	66				

Comments: Refer to Laboratory Control Sample/Laboratory Control Sample Duplicate findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21494 #17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer: JVB
2nd Reviewer: [illegible]

METHOD: ✓ GC __ HPLC

Y N N/A Were all reported results recalculated and verified for all level IV samples?
Y N N/A Were all recalculated results for detected target compounds within 10% of the reported results?

Concentration= $\frac{(A)(Fv)(Df)}{(RF)(Vs \text{ or } Ws)(\%S/100)}$

A= Area or height of the compound to be measured
Fv= Final Volume of extract
Df= Dilution Factor
RF= Average response factor of the compound In the initial calibration
Vs= Initial volume of the sample
Ws= Initial weight of the sample
%S= Percent Solid

Example:

Sample ID._____ Compound Name IVD

Concentration =_____

#	Sample ID	Compound	Reported Concentrations ( )	Recalculated Results Concentrations ( )	Qualifications

Comments: _____

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 29, 2009

LDC Report Date: September 18, 2009

Matrix: Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304609

Sample Identification

M-111AB
EB062909-GW

Introduction

This data review covers 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
7/7/09	004F0401	1	Naled	44.4	All samples in SDG 8304609	J+ (all detects)	A
7/7/09	004F0401	2	Naled	24.0	All samples in SDG 8304609	J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/26/09	010F1001	1	Naled Disulfoton	40.1 20.6	All samples in SDG 8304609	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/26/09	010F1001	2	Naled	47.6	All samples in SDG 8304609	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample EB062909-GW was identified as an equipment bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there was insufficient sample volume for analysis of the matrix spike and matrix spike duplicate.

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. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304609	All compounds reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304609

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304609	M-111AB EB062909-GW	Naled	J+ (all detects)	A	Continuing calibration (%D) (c)
8304609	M-111AB EB062909-GW	Naled Disulfoton	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304609	M-111AB EB062909-GW	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304609

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304609

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494I17
SDG #: 8304609
Laboratory: Test America

Date: 9/11/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 6/29/09
IIa.	Initial calibration	A	%RSD ≤20% r²
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	Client spec (insufficient sample)
IVc.	Laboratory control samples	A	LCS/D
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	
X.	Field blanks	ND	EB = 2

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: water

1	M-111AB	11		21		31	
2	EB062909-GW	12		22		32	
3	9182412 MB	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	

Notes:

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,I)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 24941I17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Reviewer: JVC
2nd Reviewer: [illegible]

METHOD: (GC) __ HPLC

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? (%D) or __RPD

(Y) N N/A Were continuing calibration standards analyzed at the required frequencies?
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0~~ ≤20%?

Level IV Only
Y N (N/A) Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ ~~15.0~~ ≤20)	RT (limit)	Associated Samples	Qualifications
	6/26/09	010F1001 (ICV)	Col. 1	~~C (+)~~	~~187.8~~	( )	All + Blk	~~J (all pos) (C)~~
				F (-)	40.1	( )		J-/UJ/P
				~~D (-)~~	~~83.1~~	( )		~~J/R/P~~
				k (-)	20.6	( )		J-/UJ/P
			Col. 2	~~C (+)~~	~~215.0~~	( )		~~J (all pos)~~
				F (-)	47.6	( )		J-/UJ/P
				~~D (-)~~	~~85.2~~	( )		~~J/R/P~~
						( )		
						( )		
	7/07/09	004F0401 (CCV)	Col 1	F (+)	44.4	( )		J+ all pos/A
			Col 2	F (+)	24.0	( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: June 26 through June 1, 2009

LDC Report Date: October 6, 2009

Matrix: Soil/Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304610

Sample Identification

EB062609-SO
EB062609-SORE
SA106-0.5B
SA82-0.5B
SA82-10B
SA82-29B
SA106-0.5BMS
SA106-0.5BMSD
SA82-0.5BMS
SA82-0.5BMSD

Introduction

This data review covers 8 soil samples and 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 with the following exceptions:

Sample	Analyte	Total Days From Sample Collection Until Analysis	Required Holding Time (in Days) From Sample Collection Until Analysis	Flag	A or P
EB062609-SORE	All TCL compounds	12	7	J- (all detects) UJ (all non-detects)	A

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
7/2/09	003F0301	1	Dichlorvos Mevinphos Dimethoate Fensulfothion	21.1 45.9 49.7 44.0	EB062609-SO 9180507MB	J- (all detects) UJ (all non-detects)	A
7/2/09	003F0301	1	Naled EPN	28.9 21.2	EB062609-SO 9180507MB	J+ (all detects) J+ (all detects)	A
7/2/09	003F0301	2	Mevinphos Fensulfothion Azinphos-methyl	22.3 22.9 25.9	EB062609-SO 9180507MB	J- (all detects) UJ (all non-detects)	A

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
7/2/09	003F0301	2	Merphos	27.1	EB062609-SO 9180507MB	J+ (all detects)	A
7/13/09	010F1001	1	Naled	43.2	SA106-0.5B SA82-0.5B SA82-10B SA82-29B SA106-0.5BMS SA106-0.5BMSD SA82-0.5BMS SA82-0.5BMSD 9188427MB	J+ (all detects) J+ (all detects)	A
7/13/09	010F1001	2	Naled	32.5	SA106-0.5B SA82-0.5B SA82-10B SA82-29B SA106-0.5BMS SA106-0.5BMSD SA82-0.5BMS SA82-0.5BMSD 9188427MB	J+ (all detects) J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/26/09	010F1001	1	Naled Disulfoton	40.1 20.6	All samples in SDG 8304610	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P
6/26/09	010F1001	2	Naled	47.6	All samples in SDG 8304610	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Samples EB062609-SO and EB062609-SORE were identified as equipment banks. No organophosphorus pesticide contaminants were found in these blanks.

Sample FB072109-SO (from SDG 8304616) was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

Sample	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
EB062609-SO	Not specified	Triphenylphosphate Chlormefos	46 (60-154) 37 (49-171)	All TCL compounds	J- (all detects) UJ (all non-detects)	A
9180507MB	Not specified	Triphenylphosphate Chlormefos	25 (60-154) 30 (49-171)	All TCL compounds	J- (all detects) UJ (all non-detects)	P

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) was not within QC limits for several compounds, the MS, MSD, or 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) and relative percent differences (RPD) were within QC limits.

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304610	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

*VIII. Overall Assessment of Data

The overall assessment of data was acceptable. In the case where more than one result was reported for an individual sample, the least technically acceptable results were rejected as follows:

Sample	Compound	*Flag	A or P
EB062609-SORE	All TCL compounds	X	A

*Corrected Flag in above table from "R" to "X".

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.

*Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304610

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304610	EB062609-SORE	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Technical holding times (h)
8304610	EB062609-SO	Dichlorvos Mevinphos Dimethoate Fensulfothion Azinphos-methyl	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304610	EB062609-SO	Naled EPN Merphos	J+ (all detects) J+ (all detects) J+ (all detects)	A	Continuing calibration (%D) (c)
8304610	SA106-0.5B SA82-0.5B SA82-10B SA82-29B	Naled	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D) (c)
8304610	EB062609-SO EB062609-SORE SA106-0.5B SA82-0.5B SA82-10B SA82-29B	Naled Disulfoton	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304610	EB062609-SO	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Surrogate recovery (%R) (s)
8304610	EB062609-SO EB062609-SORE SA106-0.5B SA82-0.5B SA82-10B SA82-29B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)
*8304610	EB062609-SORE	All TCL compounds	*X	A	Overall assessment of data (0)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304610

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304610

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494J17
SDG #: 8304610
Laboratory: Test America

Date: 9/15/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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	SW	Sampling dates: 6/26 – 7/01/09
IIa.	Initial calibration	A	%RSD ≤ 20% r
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	SW	
IVb.	Matrix spike/Matrix spike duplicates	SW	
IVc.	Laboratory control samples	A	LCS/D
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	SW	
IX.	Field duplicates	N	
X.	Field blanks	ND	EB = 1, r FB = FB072109-SO from 8304616

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: Water + Soil

1	EB062609-SO W	11	9180507 MB	21		31	
2	EB062609-SORE	12	9189451 MB	22		32	
3	SA106-0.5B S	13	9188427 MB	23		33	
4	SA82-0.5B	14		24		34	
5	SA82-10B	15		25		35	
6	SA82-29B	16		26		36	
7	SA106-0.5BMS	17		27		37	
8	SA106-0.5BMSD	18		28		38	
9	SA82-0.5BMS	19		29		39	
10	SA82-0.5BMSD	20		30		40	

Notes:

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. 0,0,0-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 21494 J17
SDG #: Jan Conv

VALIDATION FINDINGS WORKSHEET
Technical Holding Times

Reviewer: JV6
2nd Reviewer:

All circled dates have exceeded the technical holding times.
Y N N/A Were all cooler temperatures within validation criteria?

METHOD: GC HPLC

Sample ID	Matrix	Preserved	Sampling Date	Extraction date	Analysis date	Total # of Days	Qualifier
2	W	N	6/26/09	7/08/09	7/10/09	12	J-/MJ/A Ch

TECHNICAL HOLDING TIME CRITERIA

VOLATILES:
- Water unpreserved: Aromatic within 7 days, non-aromatic within 14 days of sample collection.
- Water preserved: Both within 14 days of sample collection.
- Soils: Both within 14 days of sample collection.

EXTRACTABLES:
- Water: Extracted within 7 days, analyzed within 40 days.
- Soil: Extracted within 14 days, analyzed within 40 days.

LDC #: 24494 17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: JVC
2nd Reviewer: _____

METHOD: ✓ GC __ HPLC

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? ✓ %D or __ RPD

Y N N/A Were continuing calibration standards analyzed at the required frequencies?
Y N N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0~~ 20%?
Level IV Only
Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ~~≤15.0~~ 20)	RT (limit)	Associated Samples	Qualifications
	6/26/09	010F1001 (ICV)	Col.1	C (+)	~~18.8~~	( )	All + Blk	~~J (all det) A~~ (C)
				F (-)	40.1	( )		J-/UJ/P
				D (-)	~~83.1~~	( )		~~J-/R/P~~
				k (-)	20.6	( )		J-/UJ/P
			Col.2	G (+)	~~21.0~~	( )		~~J+ (all det) A~~
				F (-)	47.6	( )		J-/UJ/P
				D (-)	~~85.9~~	( )		~~J- (all det) P~~
						( )		
	7/02/09	003F0301 (CCV)	Col.1	A (-)	21.1	( )	1, 9180507 MB	J-/UJ/A
				B (-)	45.9	( )		J+ dets/A
				F (+)	28.9	( )		J-/UJ/A
				I (-)	49.7	( )		J+ dets/A
				V (-)	44.0	( )		J-/UJ/A
				X (+)	21.2	( )		J+ dets/A
			Col.2	B (-)	22.3	( )		
				V (-)	22.9	( )		
				Y (-)	25.9	( )		J+ dets/A
				S (+)	27.1	( )		
						( )		
	7/13/09	010F1001 (CCV)	Col.1	F (+)	43.2	( )	3-10, 9188427 MB	J+ dets/A
			Col.2	F (+)	32.5	( )		
						( )		
						( )		
						( )		

LDC #: 21494J17
SDG #: Su Cmpl

VALIDATION FINDINDS WORKSHEET
Surrogate Recovery

Page: 1 of 1
Reviewer: JVC
2nd Reviewer: _____

METHOD: ✓ GC ___ HPLC
Are surrogates required by the method? Yes ✓ or No ____.
Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
(Y) N N/A Were surrogates spiked into all samples and blanks?
Y (N) N/A Did all surrogate recoveries (%R) meet the QC limits?

#	Sample ID	Detector/ (Column)	Surrogate Compound	%R (Limits)	Qualifications
	1	Not specified	X	46 (60-154)	J- / UJ / A (S)
			Z	37 (49-171)	
				( )	
	9180507MB		X	25 ( )	J- / UJ / P
			Z	30 ( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

	Surrogate Compound		Surrogate Compound		Surrogate Compound		Surrogate Compound		
A	Chlorobenzene (CBZ)	G	Octacosane	M	Benzo(e)Pyrene	S	1-Chloro-3-Nitrobenzene	Y	Tetrachloro-m- xylene
B	4-Bromofluorobenzene (BFB)	H	Ortho-Terphenyl	N	Terphenyl-D14	T	3,4-Dinitrotoluene	Z	Chlormefos
C	a,a,a-Trifluorotoluene	I	Fluorobenzene (FBZ)	O	Decachlorobiphenyl (DCB)	U	Tripentyltin		
D	Bromochlorobenene	J	n-Triacontane	P	1-methylnaphthalene	V	Tri-n-propyltin		
E	1,4-Dichlorobutane	K	Hexacosane	Q	Dichlorophenyl Acetic Acid (DCAA)	W	Tributyl Phosphate		
F	1,4-Difluorobenzene (DFB)	L	Bromobenzene	R	4-Nitrophenol	X	Triphenyl Phosphate		

LDC #: 21494J17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: JVG
2nd Reviewer: _____

METHOD: ✓ GC __ HPLC

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 N N/A Were the MS/MSD percent recoveries (%R) and relative percent differences (RPD) within QC limits?

#	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	7/8	I	0 (10-156)	0 (10-156)	( )	3	No qual (either LCS or MS or MSD in)
		V	35 (47-123)	16 (47-123)	75 (49)		
		B	10 (15-143)	3.8 (15-143)	92 (78)		
		Y	( )	( )	50 (43)		
		O	( )	55 (57-115)	( )		
		J	( )	48 (49-127)	( )		
		N	( )	46 (49-124)	( )		
		H	( )	40 (45-115)	( )		
		MM	( )	( )	44 (31)		
		Z	( )	( )	36 (37)		
			( )	( )	( )		
			( )	( )	( )		
	9/10	O	54 (57-115)	( )	( )	4	No qual (either MSD or LCS in)
		J	48 (49-127)	( )	( )		
		I	7.7 (10-156)	( )	107 (98)		
		V	44 (47-123)	( )	( )		
		N	48 (49-124)	( )	( )		
		B	12 (15-143)	( )	79 (78)		
		H	39 (45-115)	44 (45-115)	( )		
		JJ	47 (50-124)	( )	( )		
		BB	49 (50-115)	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		

LDC #: 21494 J17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

Page: 1 of 1
Reviewer: JVC
2nd Reviewer: _____

METHOD: ✓ GC __ HPLC

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

All available information pertaining to the data were reviewed using professional judgement to compliment the determination of the overall quality of the data.

(Y) N N/A Was the overall quality and usability of the data acceptable?

#	Sample ID ~~Compound Name~~	Finding	Associated Samples	Qualifications
	2	outside H.T.		X R/A (o)

Comments: _____

OVRNew.wpd

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 9 through July 10, 2009

LDC Report Date: September 18, 2009

Matrix: Soil/Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304612

Sample Identification

RSAM2-10B
RSAM2-35B
SA35-10B
SA35-32B
SA35009-32B
SA85-33B
EB071009-SO

Introduction

This data review covers 6 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 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
7/24/09	003F0301	1	Dichlorvos	20.6	RSAM2-10B 9203338-MB	J- (all detects) UJ (all non-detects)	A
7/24/09	003F0301	1	Naled	32.6	RSAM2-10B 9203338-MB	J+ (all detects)	A
7/24/09	003F0301	2	Naled	34.7	RSAM2-10B 9203338-MB	J+ (all detects)	A
7/16/09	019F1901	2	Naled	28.1	RSAM2-35B SA35-10B SA35-32B SA35009-32B SA85-33B 9194431-MB	J- (all detects) UJ (all non-detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/26/09	010F1001	1	Naled Disulfoton	40.1 20.6	All samples in SDG 8304612	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P
6/26/09	010F1001	2	Naled	47.6	All samples in SDG 8304612	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample EB071009-SO was identified as an equipment bank. No organophosphorus pesticide contaminants were found in this blank.

Sample FB072109-SO (from SDG 8304616) was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were added to all samples and blanks as required by the method. The percent 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. Although the relative percent difference (RPD) was not within QC limits for one compound, the LCS and LCSD percent recoveries (%R) were within QC limits and no data were qualified.

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304612	All compounds reported below the PQL.	J (all detects)	A

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

Samples SA35-32B and SA35009-32B were identified as field duplicates. No organophosphorus pesticides were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304612

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304612	RSAM2-10B	Dichlorvos	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304612	RSAM2-10B	Naled	J+ (all detects)	A	Continuing calibration (%D) (c)
8304612	RSAM2-35B SA35-10B SA35-32B SA35009-32B SA85-33B	Naled	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304612	RSAM2-10B RSAM2-35B SA35-10B SA35-32B SA35009-32B SA85-33B EB071009-SO	Naled Disulfoton	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304612	RSAM2-10B RSAM2-35B SA35-10B SA35-32B SA35009-32B SA85-33B EB071009-SO	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304612

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304612

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494L17
SDG #: 8304612
Laboratory: Test America

Date: 9/11/09
Page: 1 of 1
Reviewer: SVG
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 7/09 - 10/09
IIa.	Initial calibration	A	%RSD ≤ 20% r2
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	D9C020173-061D
IVc.	Laboratory control samples	SW	LCS/D
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D = 4, 5
X.	Field blanks	ND	EB = 7 FB = FB071209-SO (from 8304616)

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 + Water

1 RSAM2-10B S	11	9203338-MB	21		31		
2 RSAM2-35B	12	9194431-MB	22		32		
3 SA35-10B	13	9198202-MB	23		33		
4 SA35-32B D	14		24		34		
5 SA35009-32B D	15		25		35		
6 SA85-33B	16		26		36		
7 EB071009-SO W	17		27		37		
8	18		28		38		
9	19		29		39		
10	20		30		40		

Notes:

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 24944_17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Reviewer: JVG
2nd Reviewer: [signature]

METHOD: ✓ GC ___ HPLC

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? ✓ %D or ___ RPD

(Y) N N/A Were continuing calibration standards analyzed at the required frequencies?
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ≤20.0%?

Level IV Only
Y N (N/A) Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ 15.0) (≤20%)	RT (limit)	Associated Samples	Qualifications
	6/26/09	010F1001	Col. 1	C (+)	187.8	( )	All + Blks	J+dets/P (C)
		(ICV)	↓	F (-)	40.1	( )	↓	J-/UJ/P
			↓	D (-)	83.1	( )	↓	J2/R/P
			↓	K (-)	20.6	( )	↓	J-/UJ/P
			Col. 2	C (+)	215.0	( )	↓	J+dets/P
			↓	F (-)	47.6	( )	↓	J-/UJ/P
			↓	D (-)	85.7	( )	↓	J-/R/P
						( )		
						( )		
	7/24/09	003F0301	Col. 1	A (-)	20.6	( )	1, 9203338-MB	J-/UJ/A
		(CCV)	↓	F (+)	32.6	( )	↓	J+dets/A
			Col. 2	F (+)	34.7	( )	↓	↓
						( )		
						( )		
	7/16/09	019F1901	Col. 2	F (-)	28.1	( )	2-6, 9194431-MB	J-/UJ/A
		(CCV)				( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		

LDC #: 21494 L17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

Reviewer: JVG
2nd Reviewer: [illegible]

METHOD: ✓ GC __ HPLC

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

(Y) N N/A Were a laboratory control samples (LCS) and laboratory control sample duplicate (LCSD) analyzed for each matrix in this SDG?

Y (N) N/A Were the LCS percent recoveries (%R) and relative percent differences (RPD) within the QC limits?

Level IV/D Only

Y N (N/A) Was an LCS analyzed every 20 samples for each matrix or whenever a sample extraction was performed?

#	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	9203338-LCS	K	( )	( )	82 (~~10~~ 40)	1, 9203338-MB	No qual (LCS/D only)
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
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			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 13, 2009

LDC Report Date: September 18, 2009

Matrix: Soil

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304613

Sample Identification

SA176-10B
SA176009-37B
SA176-37B
RSAM3-30B

Introduction

This data review covers 4 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
7/25/09	003F0301	1	Dichlorvos Ethoprop Tokuthion	23.2 20.4 21.1	All samples in SDG 8304613	J- (all detects) UJ (all non-detects)	A
7/25/09	003F0301	2	Naled	63.4	All samples in SDG 8304613	J- (all detects) UJ (all non-detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/26/09	010F1001	1	Naled Disulfoton	40.1 20.6	All samples in SDG 8304613	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/26/09	010F1001	2	Naled	47.6	All samples in SDG 8304613	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample FB072109-SO (from SDG 8304616) was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were added to all samples and blanks as required by the method. The percent 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) were within QC limits.

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304613	All compounds reported below the PQL.	J (all detects)	A

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

Samples SA176009-37B and SA176-37B were identified as field duplicates. No organophosphorus pesticides were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304613

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304613	SA176-10B SA176009-37B SA176-37B RSAM3-30B	Dichlorvos Ethoprop Tokuthion Naled	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304613	SA176-10B SA176009-37B SA176-37B RSAM3-30B	Naled Disulfoton	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304613	SA176-10B SA176009-37B SA176-37B RSAM3-30B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304613

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304613

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494M17
SDG #: 8304613
Laboratory: Test America

Date: 9/11/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 7/13/09
IIa.	Initial calibration	A	%RSD ≤ 20
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20 %
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	D9C020173-066
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	A	
IX.	Field duplicates	ND	D = 2 3
X.	Field blanks	ND	FB = TB072109-50 (from 8304616)

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	SA176-10B	11		21		31	
2	SA176009-37B D	12		22		32	
3	SA176-37B D	13		23		33	
4	RSAM3-30B	14		24		34	
5	92 04174-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:

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 2494 17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

METHOD: __GC __HPLC

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? __%D or __RPD
Y N N/A Were continuing calibration standards analyzed at the required frequencies?
Y N N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0~~ ≤20%?
Level IV Only
Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ~~≤15.0~~ ≤20)	RT (limit)	Associated Samples	Qualifications
	6/26/09	016F1001 (ICV)	Col. 1	~~G (+)~~	~~187.8~~	( )	All + Blk	~~J+ (ICV)~~ (C)
				F (-)	40.1	( )		J-/UJ/P
				~~D (-)~~	~~83.1~~	( )		~~J-/R/P~~
				K (-)	20.6	( )		J-/UJ/P
			Col. 2	~~C (+)~~	~~215.0~~	( )		~~J+ (ICV)~~
				F (-)	47.6	( )		J-/UJ/P
				~~D (-)~~	~~85.7~~	( )		~~J-/R/P~~
						( )		
						( )		
	7/25/09	003F0301 (CCV)	Col. 1	A (-)	23.7	( )		J-/UJ/A
				E (-)	20.4	( )		
				U (-)	21.1	( )		
			Col. 2	F (-)	63.4	( )		
						( )		
						( )		
						( )		
						( )		
						( )		
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Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 14, 2009

LDC Report Date: September 19, 2009

Matrix: Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304614

Sample Identification

TR-8B

Introduction

This data review covers one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0%.

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
6/26/09	010F1001	1	Naled Disulfoton	40.1 20.6	All samples in SDG 8304614	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P
6/26/09	010F1001	2	Naled	47.6	All samples in SDG 8304614	J- (all detects) UJ (all non-detects)	P

III. Blanks

Method blanks were reviewed for each matrix as applicable. No organophosphorus pesticide 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. The percent recoveries (%R) were within QC limits.

b. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there was insufficient sample volume for analysis of the matrix spike and matrix spike duplicate.

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. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304614	All compounds reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304614

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304614	TR-8B	Naled Disulfoton	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304614	TR-8B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304614

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304614

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494N17
SDG #: 8304614
Laboratory: Test America

Date: 9/11/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 7/14/09
IIa.	Initial calibration	A	%RSD ≤20% r²
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	client spec. (insufficient sample)
IVc.	Laboratory control samples	A	LCS/D
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	
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

Validated Samples:

1	TR-8B	11		21		31	
2	9198202-MB	12		22		32	
3		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	

Notes:

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 24994 17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: JVC
2nd Reviewer: e

METHOD: (GC) ___ HPLC

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? ___%D or ___RPD
(Y) N N/A Were continuing calibration standards analyzed at the required frequencies?
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0~~ ≤20%?
Level IV Only
Y N (N/A) Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ ~~15.0~~ ≤20)	RT (limit)	Associated Samples	Qualifications
	6/26/09	010F1001 (ICV)	Col. 1	~~C (+)~~	~~187.8~~	( )	All + Blk	~~J (all +/p)~~ (C)
				F (-)	40.1	( )		J-/UJ/P
				~~D (-)~~	~~83.1~~	( )		~~J-/UJ/P~~
				k (-)	20.6	( )		J-/UJ/P
			Col. 2	~~C (+)~~	~~215.0~~	( )		~~J (all +/p)~~
				F (-)	47.6	( )		J-/UJ/P
				~~D (-)~~	~~85.9~~	( )		~~J-/UJ/P~~
						( )		
						( )		
	7/21/09	~~D18+15N~~ (~~CCV~~)				( )		
						( )		
						( )		
						( )		
						( )		
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						( )		
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Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 21, 2009

LDC Report Date: September 19, 2009

Matrix: Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304615

Sample Identification

M-97B

Introduction

This data review covers one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 with the following exceptions:

Date	Column	Compound	r^2	Associated Samples	Flag	A or P
8/6/09	2	Trichloronate	0.98937	All samples in SDG 8304615	J (all detects) UJ (all non-detects)	A

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0%.

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

III. Blanks

Method blanks were reviewed for each matrix as applicable. No organophosphorus pesticide 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. The percent recoveries (%R) were within QC limits.

b. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there was insufficient sample volume for analysis of the matrix spike and matrix spike duplicate.

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. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304615	All compounds reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304615

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304615	M-97B	Trichloronate	J (all detects) UJ (all non-detects)	A	Initial calibration (r^2) (c)
8304615	M-97B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304615

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304615

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494O17
SDG #: 8304615
Laboratory: Test America

Date: 9/11/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [signature]

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 7/21/09
IIa.	Initial calibration	SW	%RSD ≤ 20% r
IIb.	Calibration verification/ICV	~~SW~~ A	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	Client spec (insufficient sample)
IVc.	Laboratory control samples	A	LCS/D
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	
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

Validated Samples: water

1	M-97B	11		21		31	
2	9205274 MB	12		22		32	
3		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	

Notes: _____

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 21494 017
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [illegible]

METHOD: ✓ GC __ HPLC

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

Y N N/A Was a 5 point calibration curve performed?
Y N N/A Was a linear fit used for evaluation? If yes, the acceptance criteria for each compound is %RSD less than or equal to 20.0%.
Y N N/A Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation? $r^2 > 0.99$
Y N N/A Did the initial calibration meet the acceptance criteria?
Y N N/A Was initial calibration performed at the required frequency?

Level ~~IV~~ Only

Y N N/A Were the retention time windows properly established for all compounds?
Y N N/A Were compounds run at the required concentrations in the initial calibrations?

#	Date	Standard ID	Column / Detector	Compound	Finding ~~RSD Limit ≤20%~~ r^2	Associated Samples	Qualifications
	8/06/09 12:58-15:49	ICAL	col. 2	R	0.98937 (20.99)	All + Blk	J/UJ/A (C)

Comments

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 21 through July 24, 2009

LDC Report Date: September 23, 2009

Matrix: Soil/Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304616

Sample Identification

EB072109-SO
FB072109-SO
SA166-10B
SA166-31B
EB072209-SO
SA182-10B
SA182-38B
RSAH3-0.5B
RSAH3009-0.5B
RSAH3-32B
EB072309-SO
SA131-0.5B
SA131009-0.5B
SA131-10B
SA131-27B
EB072409-SO
RSAH3-0.5BMS
RSAH3-0.5BMSD

Introduction

This data review covers 13 soil samples and 5 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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:

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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 with the following exceptions:

Date	Column	Compound	r^2	Associated Samples	Flag	A or P
8/6/09	2	Trichloronate	0.98937	EB072109-SO FB072109-SO 9205274MB	J (all detects) UJ (all non-detects)	A

Retention time windows were evaluated and considered technically acceptable.

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/10/09	003F0301	1	Dichlorvos Mevinphos	56.2 36.1	SA166-10B SA166-31B 9216459MB	J+ (all detects) J+ (all detects)	A
8/10/09	003F0301	1	Naled	44.1	SA166-10B SA166-31B 9216459MB	J- (all detects) UJ (all non-detects)	A

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/10/09	003F0301	2	Dichlorvos Mevinphos	81.4 25.9	SA166-10B SA166-31B 9216459MB	J+ (all detects) J+ (all detects)	A
8/10/09	003F0301	2	Naled Parathion-ethyl Bolstar	38.1 42.8 25.4	SA166-10B SA166-31B 9216459MB	J- (all detects) UJ (all non-detects)	A
8/8/09	066F6601	1	Mevinphos	23.9	SA131-0.5B SA131009-0.5B SA131-10B SA131-27B	J+ (all detects)	A
8/8/09	066F6601	2	Dichlorvos	21.5	SA131-0.5B SA131009-0.5B SA131-10B SA131-27B	J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/6/09	010F1001 (19:10)	1	Mevinphos	22.2	SA166-10B SA166-31B SA182-10B SA182-38B RSAH3-0.5B RSAH3009-0.5B RSAH3-32B SA131-0.5B SA131009-0.5B SA131-10B SA131-27B RSAH3-0.5BMS RSAH3-0.5BMSD 9216459MB 9210468MB	J- (all detects) UJ (all non-detects)	P

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/6/09	010F1001 (19:10)	2	Mevinphos	21.1	SA166-10B SA166-31B SA182-10B SA182-38B RSAH3-0.5B RSAH3009-0.5B RSAH3-32B SA131-0.5B SA131009-0.5B SA131-10B SA131-27B RSAH3-0.5BMS RSAH3-0.5BMSD 9216459MB 9210468MB	J- (all detects) UJ (all non-detects)	P
8/6/09	010F1001 (19:10)	1	Mevinphos	23.8	EB072209-SO EB072309-SO EB072409-SO 9206112MB	J- (all detects) UJ (all non-detects)	P
8/6/09	010F1001 (19:10)	2	Mevinphos	21.4	EB072209-SO EB072309-SO EB072409-SO 9206112MB	J- (all detects) UJ (all non-detects)	P

Retention times (RT) of all compounds in the calibration standards were within QC limits.

III. Blanks

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

Samples EB072109-SO, EB072209-SO, EB072309-SO, and EB072409-SO were identified as equipment banks. No organophosphorus pesticide contaminants were found in these blanks.

Sample FB072109-SO was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were added to all samples and blanks as required by the method. The percent 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

All target compound identifications were within validation criteria.

VI. Project Quantitation Limit

All project quantitation limits PQLs were within validation criteria.

The sample results for detected compounds from the two columns were within 40% relative percent difference (RPD) with the following exceptions:

Sample	Compound	RPD	Flag	A or P
SA131-0.5B	Coumaphos	58	J (all detects)	A

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304616	All compounds reported below the PQL.	J (all detects)	A

VII. System Performance

The system performance was acceptable.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples RSAH3-0.5B and RSAH3009-0.5B and samples SA131-0.5B and SA131009-0.5B were identified as field duplicates. No organophosphorus pesticides were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA131-0.5B	SA131009-0.5B				
Azinphos-methyl	20	14U	-	6 (≤14)	-	-
Coumaphos	6.1	14U	-	7.9 (≤14)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organophosphorus Pesticides - Data Qualification Summary - SDG 8304616

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304616	EB072109-SO FB072109-SO	Trichloronate	J (all detects) UJ (all non-detects)	A	Initial calibration (r^2) (c)
8304616	SA166-10B SA166-31B	Dichlorvos Mevinphos	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D) (c)
8304616	SA166-10B SA166-31B	Naled Parathion-ethyl Bolstar	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304616	SA131-0.5B SA131009-0.5B SA131-10B SA131-27B	Mevinphos	J+ (all detects)	A	Continuing calibration (%D) (c)
8304616	SA131-0.5B SA131009-0.5B SA131-10B SA131-27B	Dichlorvos	J+ (all detects)	A	Continuing calibration (%D) (c)
8304616	SA166-10B SA166-31B EB072209-SO SA182-10B SA182-38B RSAH3-0.5B RSAH3009-0.5B RSAH3-32B EB072309-SO SA131-0.5B SA131009-0.5B SA131-10B SA131-27B EB072409-SO	Mevinphos	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304616	SA131-0.5B	Coumaphos	J (all detects)	A	Project Quantitation Limit (PQL) (dc)

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304616	EB072109-SO FB072109-SO SA166-10B SA166-31B EB072209-SO SA182-10B SA182-38B RSAH3-0.5B RSAH3009-0.5B RSAH3-32B EB072309-SO SA131-0.5B SA131009-0.5B SA131-10B SA131-27B EB072409-SO	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304616

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304616

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B 4

LDC #: 21494P17
SDG #: 8304616
Laboratory: Test America

Date: 9/14/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [illegible]

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 7/21-24/09
IIa.	Initial calibration	SW	% RSD ≤ 20% r
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS/D
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	SW	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	SW	*D1 = 8, 9 D2 = 12, 13
X.	Field blanks	ND	EB = 1, 5, 11, 16 FB = 2

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 + Water

1	1	EB072109-SO	W	11	3	EB072309-SO	W	21	1	9205274-MB	31	
2	1	FB072109-SO		12	4	SA131-0.5B	D2 S	22	2	9216459-MB	32	
3	*	SA166-10B	S	13	4	SA131009-0.5B	D2	23	3	9206112-MB	33	
4	*	SA166-31B		14	4	SA131-10B		24	4	9210468-MB	34	
5	3	EB072209-SO	W	15	4	SA131-27B		25			35	
6	4	SA182-10B	S	16	3	EB072409-SO	W	26			36	
7	4	SA182-38B		17	4	RSAH3-0.5BMS	S	27			37	
8	4	RSAH3-0.5B	D1	18	4	RSAH3-0.5BMSD		28			38	
9	4	RSAH3009-0.5B	D1	19				29			39	
10	4	RSAH3-32B		20				30			40	

Notes: _____

LDC #: 21494 P17
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JM
2nd Reviewer: [illegible]

Method: ✓ GC _____ HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Were all percent relative standard deviations (%RSD) ≤ 20%?	✓			
Was a curve fit used for evaluation?	✓			
Did the initial calibration meet the curve fit acceptance criteria of ≥ 0.990?	✓			
Were the RT windows properly established?	✓			
IV. Continuing calibration				
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 15%.0 or percent recoveries 85-115%?	✓			
Were all the retention times within the acceptance windows?		✓		
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed for each matrix and concentration?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
VI. Surrogate spikes				
Were all surrogate %R within the QC limits?	✓			
If the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R outside of criteria?			✓	
VII. Matrix spike/Matrix spike duplicates				
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.	✓			
Was a MS/MSD analyzed every 20 samples of each matrix?	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?	✓			
VIII. Laboratory control samples				
Was an LCS analyzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?	✓			
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	

LDC #: 21494 P17
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVG
2nd Reviewer:

Validation Area	Yes	No	NA	Findings/Comments
X. Target compound identification				
Were the retention times of reported detects within the RT windows?	✓			
XI. Compound quantitation/CRQLs				
Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
XII. System performance				
System performance was found to be acceptable.	✓			
XIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
XIV. Field duplicates				
Field duplicate pairs were identified in this SDG.	✓			
Target compounds were detected in the field duplicates.	✓			
XV. Field blanks				
Field blanks were identified in this SDG.	✓			
Target compounds were detected in the field blanks.		✓		

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,I)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 21494 P17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration

Page: 1 of 1
Reviewer: JVC
2nd Reviewer: [illegible]

METHOD: ✓ GC ___ HPLC

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

Y N N/A Was a 5 point calibration curve performed?
Y N N/A Was a linear fit used for evaluation? If yes, the acceptance criteria for each compound is %RSD less than or equal to 20.0%.
Y N N/A Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation? $r^2 \geq 0.99$
Y N N/A Did the initial calibration meet the acceptance criteria?
Y N N/A Was initial calibration performed at the required frequency?

Level IV Only

Y N N/A Were the retention time windows properly established for all compounds?
Y N N/A Were compounds run at the required concentrations in the initial calibrations?

#	Date	Standard ID	Column / Detector	Compound	Finding r ~~RSD Limit ≤20%~~	Associated Samples	Qualifications
	8/06/09 12:58-15:49	ICAL	Col. 2	R	0.98937 (≥0.99)	1, 2, 9205 27 MB	J/UJ/A (c)

Comments _____

LDC #: 21494 D17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Reviewer: JVG
2nd Reviewer:

METHOD: ✓ GC __ HPLC

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? ✓ %D or __RPD

(Y) N N/A Were continuing calibration standards analyzed at the required frequencies?
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ≤ ~~15.0~~ 20%?

Level IV Only

(Y) N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ ~~15.0~~ ≤20%)	RT (limit)	Associated Samples	Qualifications
	8/10/09	003F0301	Col. 1	A (+)	56.2	( )	3, 4, 9216459 MB	J + dets/A (C)
	17:55	(CCV)		B (+)	36.1	( )		
				F (-)	44.1	( )		J-/UJ/A
			Col. 2	A (+)	81.4	( )		J + dets/A
				B (+)	25.9	( )		
				F (-)	38.1	( )		J-/UJ/A
				Q (-)	42.8	( )		
				W (-)	25.4	( )		
	8/08/09	066F6601	Col. 1	B (+)	23.9	( )	12-15	J + dets/A
		(CCV)	Col. 2	A (+)	21.5	( )		

LDC #: 21494 p17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
I Continuing Calibration

Page: 1 of 1
Reviewer: SV6
2nd Reviewer: [illegible]

METHOD: ✓ GC ___ HPLC

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? ___%D or ___RPD
(Y) N N/A Were continuing calibration standards analyzed at the required frequencies? 20
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ≤ ~~15.0~~ 20%?
Level IV Only
(Y) N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ ~~15.0~~ 20)	RT (limit)	Associated Samples	Qualifications
	8/06/09 16:09	010F1001 (ICV)	Col. 1	C (+)	230.0	( )	1, 2, 9205274-MB	J + dets / P (C)
			↓	D (-)	88.8	( )	↓	J- / R / P
			Col. 2	C (+)	178.7	( )	↓	~~J + dets / P~~
			↓	D (-)	75.6	( )	↓	J- / R / P
						( )		
						( )		
(Tol, FBP)	8/06/09 19:20	010F1001 (ICV)	Col. 1	B (-)	22.2	( )	3, 4, 9216459 MB	J- / UJ / P
			↓	~~C (+)~~	~~211.6~~	( )	6-10, 12-15, 17, 18,	~~J + dets / P~~
				~~D (-)~~	~~84.9~~	( )	9210468-MB	~~J- / R / P~~
			Col. 2	B (-)	21.1	( )	↓	J- / UJ / P
			↓	~~C (+)~~	~~218.1~~	( )		~~J + dets / P~~
				~~D (-)~~	~~93.1~~	( )		~~J- / R / P~~
						( )		
						( )		
(TOLP)	8/06/09 19:10	010F1001 (ICV)	Col. 1	B (-)	23.8	( )	5, 11, 16, 9206112 MB	J- / UJ / P
			↓	~~C (+)~~	~~201.3~~	( )	↓	~~J + dets / P~~
				~~D (-)~~	~~85.0~~	( )		J- / R / P
			Col. 2	~~C (+)~~	~~221.3~~	( )		J + dets / P
				~~D (-)~~	~~93.1~~	( )		~~J- / R / P~~
				B (-)	21.4	( )		J- / UJ / P
						( )		
						( )		
						( )		
						( )		

LDC #: 21494 P17
SDG #: See Cover

METHOD: ✓ GC ___ HPLC

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

Reviewer: JVG
2nd Reviewer: [illegible]

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

Level IV/D Only

(Y) N N/A Were CRQLs adjusted for sample dilutions, dry weight factors, etc.?
(Y) N N/A Did the reported results for detected target compounds agree within 10.0% of the recalculated results?
Y (N) N/A Did the percent difference of detected compounds between two columns./detectors ≤40%? If no, please see findings bellow.

#	Compound Name	Sample ID	%RPD/%D Between Two Columns/Detectors Limit (≤ 40%)	Qualifications
	2	12	58	J det/A (dc)

Comments: See sample calculation verification worksheet for recalculations

LDC #: 21494 P17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Page: 1 of 1
Reviewer: JVG
2nd reviewer: [illegible]

METHOD: ✓ GC __ HPLC

Y N N/A Were field duplicate pairs identified in this SDG?
Y N N/A Were target compounds detected in the field duplicate pairs?

Compound	Concentration (ug/kg)		%RPD Limit ____	Qualification Parent only / All Samples
	12	13		
Y	20	14 U	6 (≤14 Diff)	
Z	6.1	↓	7.9 ↓	

Compound	Concentration ( )		%RPD Limit ____	Qualification Parent only / All Samples

LDC #: 21494 P17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JV6
2nd Reviewer: R

METHOD: GC ✓ HPLC ____

The calibration Factor (CF), average CF, and percent relative standard deviation (%RSD) were recalculated for the compounds identified below using the following calculations:

CF = A/C
average CF = sum of the CF/number of standards
%RSD = 100 * (S/X)

A = Area of compound,
C = Concentration of compound,
S = Standard deviation of the CF
X = Mean of the CFs

#	Standard ID	Calibration Date	Compound	Reported CF (2,00 std)	Recalculated CF (2,00std)	Reported Average CF (initial)	Recalculated Average CF (initial)	Reported %RSD	Recalculated %RSD
* 1	ICAL 12:58-15:47	8/06/09	Dichlorvos (8141A-2)	See r^2 calc.					
			Phorate	2.03409	2.03409	1.99571	1.99571	10.65160	10.65165
			Malathion	See r^2 calc.					
2			Dichlorvos (8141A-1)						
			Phorate	~~0.84084~~		~~0.84507~~		~~13.29300~~	
			Malathion		✓				
** 3	ICAL 14:56-18:34	8/06/09	Dichlorvos (8141A-1)	0.86756	0.86756	0.84168	0.84168	3.52069	3.52061
			Phorate	1.07117	1.07117	1.03104	1.03104	8.29536	8.29546
			Malathion	1.08977	1.08977	1.00124	1.00124	8.61180	8.61180
4			Dichlorvos (8141A-2)	0.86014	0.86014	0.83367	0.83357	4.86412	4.84277
			Phorate	0.84084	0.84084	0.84507	0.84507	13.29300	13.29294
			Malathion	See r^2 calc					

Comments: Refer to Initial Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

* IS = TOCP = 2.0

** = IS = Tributyl phosphate = 2.0 (Phorate & Dichlorvos)
IS = TOCP = 2.0 (Malathion)

LDC #: 21494 P17
SDG #: Su Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: Q

METHOD: GC / HPLC

The calibration Factor (CF), average CF, and percent relative standard deviation (%RSD) were recalculated for the compounds identified below using the following calculations:

CF = A/C
average CF = sum of the CF/number of standards
%RSD = 100 * (S/X)

A = Area of compound,
C = Concentration of compound,
S = Standard deviation of the CF
X = Mean of the CFs

#	Standard ID	Calibration Date	Compound	Reported CF (20 std)	Recalculated CF (20 std)	Reported Average CF (initial)	Recalculated Average CF (initial)	Reported %RSD	Recalculated %RSD
1	ICAL	8/06/09	Dichlorvos	1.25265	1.25265	1.21037	1.21637	3.27378	3.27372
	(TOCP)	14:56-18:34	Phorate	1.54663	1.54663	1.48247	1.48247	7.97047	7.970498
			Malathion	1.08977	1.08977	1.00124	1.00124	8.618	8.618
2			Dichlorvos	1.16144	1.16144	1.11441	1.11441	4.50356	4.50360
			Phorate	1.13537	1.13537	1.12665	1.12665	10.03095	10.03096
			Malathion	see →		calc. (same as other one)			
3									
4									

Comments: Refer to Initial Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results. ICAL TOCP = IS used is TOCP for all cpds. Same raw data as the other ICAL. ~~Malathion~~

INICLC.1SB

LDC # 21494 #17
SDG# Su Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: NG
2nd Reviewer: R

METHOD: GC EPA SW 846 Method 8141A

Parameter: Dichlorvos

Date	Column	Compound	Y Area ratio	X Conc ratio	X^2
08/06/2009 12:58 15:4v	(8141A-2)	Dichlorvos	0.16666	0.100	
			0.14234	0.250	
			1.14300	0.500	
			1.86832	1.000	
			2.84139	1.500	
			3.91604	2.000	
			4.54365	2.500	

Regression Output:			Reported	
Constant		-0.04459	c =	0.00661
Std Err of Y Est		0.19659		
R Squared		0.9900	r2 =	0.99400
No. of Observations		7.00000		
Degrees of Freedom		5.00000		
X Coefficient(s)	1.9024	-0.002208	a	1.91742E+000
Std Err of Coef.	0.087748	0.00		

IS = TOCP = 2.0ug/mL
LAb used weighted linear regression

LDC # 21494 P17
SDG# See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: [signature]

METHOD: GC EPA SW 846 Method 8141A

Parameter: Malathion

Date	Column	Compound	Y Area ratio	X Conc ratio	X^2
08/06/2009 12:58-15:47	(8141A-2)	Malathion	0.08761	0.100	
			0.08110	0.250	
			0.66683	0.500	
			1.12291	1.000	
			1.66312	1.500	
			2.22001	2.000	
			2.69919	2.500	

Regression Output:		Reported	
Constant	-0.02887	c =	0.01372
Std Err of Y Est	0.10316		
R Squared	0.99153	r2 =	0.99453
No. of Observations	7.00000		
Degrees of Freedom	5.00000		
X Coefficient(s) 1.1137	-0.002208	a	1.12630E+000
Std Err of Coef. 0.046046	0.00		

IS = TOCP = 2.0ug/mL
LAb used weighted linear regression

LDC # 21494 P17
SDG# See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVC
2nd Reviewer: S

METHOD: GC EPA SW 846 Method 8141A

Parameter: Dichlorvos

Date	Column	Compound	Y Area ratio	X Conc ratio	X^2
08/06/2009 12:58-15:47	(8141A-1)	Dichlorvos	0.17514	0.100	
			0.44788	0.250	
			1.21081	0.500	
			2.03738	1.000	
			3.11399	1.500	
			4.02458	2.000	
			5.10973	2.500	

Regression Output:			Reported	
Constant		0.02613	c =	0.01094
Std Err of Y Est		0.09498		
R Squared		0.99782	r2 =	0.99581
No. of Observations		7.00000		
Degrees of Freedom		5.00000		
X Coefficient(s)	2.0301	-0.002208	a	2.07952E+000
Std Err of Coef.	0.042397	0.00		

IS = TOCP = 2.0ug/mL
LAb used weighted linear regression

LDC # 21494 P17
SDG# Sulfur

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: [signature]

METHOD: GC EPA SW 846 Method 8141A

Parameter: Malathion

Date	Column	Compound	Y Area ratio	X Conc ratio	X^2
08/06/2009 12:58-15:42	(8141A-1)	Malathion	0.10725	0.100	
			0.27812	0.250	
			0.73013	0.500	
			1.19616	1.000	
			1.74866	1.500	
			2.23552	2.000	
			2.89440	2.500	

Regression Output:		Reported	
Constant	0.04712	c =	-0.00342
Std Err of Y Est	0.07124		
R Squared	0.99605	r2 =	0.99300
No. of Observations	7.00000		
Degrees of Freedom	5.00000		
X Coefficient(s) 1.1287	-0.002208	a	1.17261E+000
Std Err of Coef. 0.031800	0.00		

IS = TOCP = 2.0ug/mL
LAb used weighted linear regression

LDC # 21494 P17
SDG# Sw Conv

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVT
2nd Reviewer: [signature]

METHOD: GC EPA SW 846 Method 8141A

Parameter: Phorate

Date	Column	Compound	Y Area ratio	X Conc ratio	X^2
08/06/2009 12:58-15:47	(8141A-1)	Phorate	0.18690	0.100	
			0.49767	0.250	
			1.18283	0.500	
			1.93715	1.000	
			2.80443	1.500	
			3.62669	2.000	
			4.57604	2.500	

Regression Output:			Reported	
Constant		0.11374	c =	-0.05994
Std Err of Y Est		0.10106		
R Squared		0.99682	r2 =	0.99682
No. of Observations		7.00000		
Degrees of Freedom		5.00000		
X Coefficient(s)	1.7854	-0.002208	a	1.79112E+000
Std Err of Coef.	0.045109	0.00		

IS = TOCP = 2.0ug/mL
LAb used weighted linear regression

LDC #: 21494 P17
SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: Q

METHOD: GC EPA SW 846 Method 8141A

Parameter: Malathion

Date	Column	Compound	Y Area ratio	X Conc ratio	X^2
08/06/2009 14:56-18:34	(8141A-2)	Malathion	0.06172	0.100	
			0.16064	0.250	
			0.35869	0.500	
			0.71697	1.000	
			1.02499	1.500	
			1.35430	2.000	
			1.61327	2.500	

Regression Output:			Reported	
Constant		0.02098	c =	0.01814
Std Err of Y Est		0.03472		
R Squared		0.99721	r2 =	0.99782
No. of Observations		7.00000		
Degrees of Freedom		5.00000		
X Coefficient(s)	0.6553	-0.002208	a	9.45490E-001
Std Err of Coef.	0.015497	0.00		

IS = Tributylphosphate = 2.0ug/mL
LAb used weighted linear regression

LDC #: 21494 P17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer: JVC
2nd Reviewer: [illegible]

METHOD: GC ✓ HPLC ____

The percent difference (%D) of the initial calibration average Calibration Factors (CF) and the continuing calibration CF were recalculated for the compounds identified below using the following calculation:

% Difference = 100 * (ave. CF - CF)/ave. CF
CF = A/C

Where: ave. CF = initial calibration average CF
CF = continuing calibration CF
A = Area of compound
C = Concentration of compound

#	Standard ID	Calibration Date	Compound	Average CF(ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %D	Recalculated %D
1			1, 2 - analyzed right after 5, 11, 16		LCRL			
3,4 2	003 F0301	8/10/09	Dichlorvos (8141-2)	2.500	3.9054	3.9057	56.2	56.2
			Phorate		2.1678	2.1678	13.3	13.3
			Malathion		2.2638	2.2638	9.4	9.4
3			Dichlorvos (8141-1)		4.5358	4.5358	81.4	81.4
			Phorate		2.4096	2.4096	3.6	3.6
			Malathion	✓	2.0320	2.0320	18.7	18.7
4								

Comments: Refer to Continuing Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21494 P17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer: JVC
2nd Reviewer: [illegible]

METHOD: GC ✓ HPLC _____

The percent difference (%D) of the initial calibration average Calibration Factors (CF) and the continuing calibration CF were recalculated for the compounds identified below using the following calculation:

% Difference = 100 * (ave. CF -CF)/ave.CF

Where: ave. CF = initial calibration average CF
CF = continuing calibration CF
A = Area of compound
C = Concentration of compound

#	Standard ID	Calibration Date	Compound	Average CF(ical)/ CCV Conc.	Reported CF/ Conc. CCV	Recalculated CF/ Conc. CCV	Reported %D	Recalculated %D
6-10 1	052F5201	8/07/09	Dichlorvos (8141-1)	2.500	2.5653	2.5653	2.6	2.6
			Phorate		2.4186	2.4186	3.3	3.3
			Malathion		2.4924	2.4924	0.3	0.3
2			Dichlorvos (8141-2)		2.8464	2.8464	13.9	13.9
			Phorate		2.4649	2.4649	1.4	1.4
			Malathion		2.4084	2.4084	3.7	3.7
12-15 3	066F6601	8/08/09	Dichlorvos (8141-1)		2.8136	2.8136	12.5	12.5
			Phorate		2.5067	2.5067	0.3	0.3
			Malathion		2.5036	2.5036	0.1	0.1
4			Dichlorvos (8141-2)		3.0385	3.0385	21.5	21.5
			Phorate		2.4347	2.4347	2.6	2.6
			Malathion		2.4180	2.4180	3.3	3.3

Comments: Refer to Continuing Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21494 P17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Reviewer: JV6
2nd reviewer: [illegible]

METHOD: ✓ GC ___ HPLC

The percent recoveries (%R) of surrogates were recalculated for the compounds identified below using the following calculation:

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: # 1

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Triphenyl phosphate	Col. 2	1.0	0.86945	87	87	0
Chlormefos	↓	↓	0.52199	52	52	↓

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference

LDC #: 21494 P17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Page: 1 of 1
Reviewer: JV6
2nd Reviewer: [signature]

METHOD: __ GC __ HPLC

The percent recoveries (%R) and relative percent differences (RPD) of the matrix spike and matrix spike duplicate were recalculated for the compounds identified below using the following calculation:

%Recovery = 100 * (SSC - SC)/SA Where SSC = Spiked sample concentration SA = Spike added SC = Sample concentration

RPD =(({SSCMS - SSCMSD} * 2) / (SSCMS + SSCMSD))*100 MS = Matrix spike MSD = Matrix spike duplicate

MS/MSD samples: 17 /18

Compound	Spike Added (ug/kg)		Sample Conc. (ug/kg)	Spike Sample Concentration (ug/kg)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	---	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											
Dichlorvos (8141)	131	130	0	119	107	91	91	82	82	10	11
Malathion ↓	↓	↓	↓	87.6	85	67	67	65	65	3.0	3

Comments: Refer to Matrix Spike/Matrix Spike Duplicates findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21464 P17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Sample/Laboratory Control Sample Duplicate Results Verification

Page: 1 of 1
Reviewer: JV6
2nd Reviewer: [illegible]

METHOD: ✓ GC __HPLC

The percent recoveries (%R) and Relative Percent difference (RPD) of the laboratory control sample and laboratory control sample duplicate were recalculated for the compounds identified below using the following calculation:

% Recovery = 100* (SSC-SC)/SA
RPD = | LCS - LCSD | * 2/(LCS + LCSD)

Where: SSC = Spiked sample concentration
SA = Spike added
LCS = Laboratory control sample percent recovery
SC = Concentration
LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: 9205274 LCS/D

Compound	Spike Added (ug/L)		Spiked Sample Concentration (ug/L)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)										
Diesel (8015)										
Benzene (8021B)										
Methane (RSK-175)										
2,4-D (8151)										
Dinoseb (8151)										
Naphthalene (8310)										
Anthracene (8310)										
HMX (8330)										
2,4,6-Trinitrotoluene (8330)										
Dichlorvos (8141)	4.00	4.00	3.42	3.29	86	86	82	82	4.0	4
Malathion	↓	↓	3.09	3.01	77	77	75	75	2.5	2.6

Comments: Refer to Laboratory Control Sample/Laboratory Control Sample Duplicate findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21494 P17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer: JV6
2nd Reviewer: [illegible]

METHOD: ___ GC ___ HPLC

Y N N/A Were all reported results recalculated and verified for all level IV samples?
Y N N/A Were all recalculated results for detected target compounds within 10% of the reported results?

Concentration= $\frac{(A)(Fv)(Df)}{(RF)(Vs \text{ or } Ws)(\%S/100)}$

A= Area or height of the compound to be measured
Fv= Final Volume of extract
Df= Dilution Factor
RF= Average response factor of the compound in the initial calibration
Vs= Initial volume of the sample
Ws= Initial weight of the sample
%S= Percent Solid

Example:

Sample ID. # 12 Compound Name Coumaphos

Concentration = $\left(\frac{\left[\frac{(2836)}{(919355)}\right]}{0.89074} + 0.03646 \right) 2 = 0.08107$

final conc. = $\frac{(0.08107)(2ml)(1000)}{(30.7g)(0.88)} = 6.1 \text{ ug/kg}$

#	Sample ID	Compound	Reported Concentrations	Recalculated Results Concentrations	Qualifications

Comments: _____

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 21 through July 22, 2009

LDC Report Date: September 24, 2009

Matrix: Soil

Parameters: Organophosphorus Pesticides

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304617

Sample Identification

SA166-10BSPLP
SA166-10BSPLPDI
SA182-10BSPLP
SA182-10BSPLPDI
SA166-10BSPLPMS
SA166-10BSPLPMSD
SA166-10BSPLPDIMS
SA166-10BSPLPDIMSD

Introduction

This data review covers 8 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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:

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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

Retention time windows were evaluated and considered technically acceptable.

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0%.

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

Retention times (RT) of all compounds in the calibration standards were within QC limits..

III. Blanks

Method blanks were reviewed for each matrix as applicable. No organophosphorus pesticide 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. The percent 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) were within QC limits.

V. Target Compound Identification

All target compound identifications were within validation criteria.

VI. Project Quantitation Limit

All project quantitation limits PQLs were within validation criteria.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304617	All compounds reported below the PQL.	J (all detects)	A

VII. System Performance

The system performance was acceptable.

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organophosphorus Pesticides - Data Qualification Summary - SDG 8304617

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304617	SA166-10BSPLP SA166-10BSPLPDI SA182-10BSPLP SA182-10BSPLPDI	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304617

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304617

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET

LDC #: 21494Q17
SDG #: 8304617
Laboratory: Test America

Stage ~~2B~~ 4

Date: 9/15/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer: [illegible]

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 7/21 - 22/09
IIa.	Initial calibration	A	%RSD ≤ 20% r
IIb.	Calibration verification/ICV	~~JVG~~ SW A	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
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	~~JVG~~ SW 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

Validated Samples: Soil

1	SA166-10BSPLP	11	9211412 MB	21		31	
2	SA166-10BSPLP~~RE~~ DI	12	9211418 MB	22		32	
3	SA182-10BSPLP	13		23		33	
4	SA182-10BSPLP~~RE~~ DI	14		24		34	
5	SA166-10BSPLPMS	15		25		35	
6	SA166-10BSPLPMSD	16		26		36	
7	SA166-10BSPLP~~RE~~DIMS	17		27		37	
8	SA166-10BSPLP~~RE~~DIMSD	18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 21494 Q17
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVC
2nd Reviewer: A

Method: ✓ GC _____ HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Were all percent relative standard deviations (%RSD) ≤ 20%?	✓			
Was a curve fit used for evaluation?	✓			
Did the initial calibration meet the curve fit acceptance criteria of ≥ 0.990?	✓			
Were the RT windows properly established?	✓			
IV. Continuing calibration				
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 15%.0 or percent recoveries 85-115%?	✓			
Were all the retention times within the acceptance windows?		✓		
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed for each matrix and concentration?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
VI. Surrogate spikes				
Were all surrogate %R within the QC limits?	✓			
If the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R outside of criteria?			✓	
VII. Matrix spike/Matrix spike duplicates				
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.	✓			
Was a MS/MSD analyzed every 20 samples of each matrix?	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?	✓			
VIII. Laboratory control samples				
Was an LCS analyzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?	✓			
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	

LDC #: 21494 Q17
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JV
2nd Reviewer: [signature]

Validation Area	Yes	No	NA	Findings/Comments
X. Target compound identification				
Were the retention times of reported detects within the RT windows?	✓			
XI. Compound quantitation/CRQLs				
Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
XII. System performance				
System performance was found to be acceptable.	✓			
XIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
XIV. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target compounds were detected in the field duplicates.			✓	
XV. Field blanks				
Field blanks were identified in this SDG.		✓		
Target compounds were detected in the field blanks.		✓		

LDC #: 21494 Q17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Page: 1 of 3
Reviewer: JVG
2nd Reviewer:

METHOD: GC ✓ HPLC ____

The calibration Factor (CF), average CF, and percent relative standard deviation (%RSD) were recalculated for the compounds identified below using the following calculations:

CF = A/C
average CF = sum of the CF/number of standards
%RSD = 100 * (S/X)

A = Area of compound,
C = Concentration of compound,
S = Standard deviation of the CF
X = Mean of the CFs

#	Standard ID	Calibration Date	Compound	Reported CF (2.0 std)	Recalculated CF (2.0 std)	Reported Average CF (initial)	Recalculated Average CF (initial)	Reported %RSD	Recalculated %RSD
1	ICAL	8/03/09	Dichlorvos (8141-1)	1.96501	1.96501	1.82706	1.82706	7.61929	7.61934
			Phorate	See r² calc.					
			Malathion	1.36616	1.36616	1.28601	1.28601	6.26729	6.26780
2			Dichlorvos (8141-2)	1.68626	1.68626	1.55884	1.55884	5.64768	5.64782
			Phorate/Ethoprop	See r² calc.					
			Malathion	1.16461	1.16461	1.07563	1.07563	5.21237	5.21245
3									
4									

Comments: Refer to Initial Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

IS = TOCP (2.0 ug/ml)

LDC # 21494 Q17
SDG# Sre Cmry

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVC
2nd Reviewer: [signature]

METHOD: GC EPA SW 846 Method 8141A

Parameter: Phorate

Date	Column	Compound	Y Area ratio	X Conc ratio	X^2
08/03/2009	(8141A-1)	Phorate	0.18145	0.100	
			0.53110	0.250	
			1.04001	0.500	
			2.13734	1.000	
			3.09373	1.500	
			3.53449	2.000	
			4.98370	2.500	

Regression Output:			Reported	
Constant		0.07126	c =	-0.02464
Std Err of Y Est		0.20117		
R Squared		0.99000	r2 =	0.99500
No. of Observations		7.00000		
Degrees of Freedom		5.00000		
X Coefficient(s)	1.9112	-0.002208	a	1.93230E+000
Std Err of Coef.	0.089791	0.00		

IS = TOCP = 2.0ug/mL
LAb used weighted linear regression

LDC # 21494Q17
SDG# Su Curves

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: [signature]

METHOD: GC EPA SW 846 Method 8141A

Parameter: Phorate/Ethoprop

Date	Column	Compound	Y Area ratio	X Conc ratio	X^2
08/03/2009	(8141A-2)	Phorate/Ethoprop	0.29174	0.200	
			0.73456	0.500	
			1.50219	1.000	
			3.33981	2.000	
			4.68224	3.000	
			5.72258	4.000	
			7.80615	5.000	

Regression Output:		Reported	
Constant	0.02499	c =	0.01406
Std Err of Y Est	0.23214		
R Squared	0.99424	r2 =	0.99671
No. of Observations	7.00000		
Degrees of Freedom	5.00000		
X Coefficient(s) 1.5226	-0.002208	a	1.55380E+000
Std Err of Coef. 0.051808	0.00		

IS = TOCP = 2.0ug/mL
LAb used weighted linear regression

LDC #: 21494Q17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer: JVG
2nd Reviewer: R

METHOD: GC / HPLC

The percent difference (%D) of the initial calibration average Calibration Factors (CF) and the continuing calibration CF were recalculated for the compounds identified below using the following calculation:

% Difference = 100 * (ave. CF - CF)/ave. CF
CF = A/C

Where: ave. CF = initial calibration average CF
CF = continuing calibration CF
A = Area of compound
C = Concentration of compound

#	Standard ID	Calibration Date	Compound	Average CF(ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %D	Recalculated %D
1			All samples analyzed right after ICAL					
2								
3								
4								

Comments: Refer to Continuing Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21494 Q17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Page: 1 of 1
Reviewer: JVC
2nd reviewer:

METHOD: __ GC __ HPLC

The percent recoveries (%R) of surrogates were recalculated for the compounds identified below using the following calculation:

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: # 1

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Triphenyl phosphate	Col. 1	1.00	0.7898	79	79	0
Chlormefos	Col. 2	↓	0.5855	58	58	↓

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference

LDC #: 21494 Q17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: JV6
2nd Reviewer: [signature]

METHOD: ✓ GC __HPLC

The percent recoveries (%R) and relative percent differences (RPD) of the matrix spike and matrix spike duplicate were recalculated for the compounds identified below using the following calculation:

%Recovery = 100 * (SSC - SC)/SA Where SSC = Spiked sample concentration SC = Sample concentration
SA = Spike added
RPD =(({SSCMS - SSCMSD} * 2) / (SSCMS + SSCMSD))*100 MS = Matrix spike MSD = Matrix spike duplicate

MS/MSD samples: 5/6

Compound	Spike Added (ug/L)		Sample Conc. (ug/L)	Spike Sample Concentration (ug/L)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	---	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											
Dichlorvos (8141)	4.00	4.00	0	3.07	3.36	77	77	84	84	9.0	9
Malathion ↓	↓	↓	↓	2.7 ✓	2.9 ✓	68	68	73	73	7.3	7.1

Comments: Refer to Matrix Spike/Matrix Spike Duplicates findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21494 Q17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Sample/Laboratory Control Sample Duplicate Results Verification

Page: 1 of 1
Reviewer: JV6
2nd Reviewer: [signature]

METHOD: ✓ GC __ HPLC

The percent recoveries (%R) and Relative Percent difference (RPD) of the laboratory control sample and laboratory control sample duplicate were recalculated for the compounds identified below using the following calculation:

% Recovery = 100* (SSC-SC)/SA
RPD = | LCS - LCSD | * 2/(LCS + LCSD)

Where: SSC = Spiked sample concentration
SA = Spike added
LCS = Laboratory control sample percent recovery
SC = Concentration
LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: 9211418 LCS

Compound	Spike Added (ug/L)		Spiked Sample Concentration (ug/L)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)										
Diesel (8015)										
Benzene (8021B)										
Methane (RSK-175)										
2,4-D (8151)										
Dinoseb (8151)										
Naphthalene (8310)										
Anthracene (8310)										
HMX (8330)										
2,4,6-Trinitrotoluene (8330)										
Dichlorvos (8141)	4.00	NA	3.27	NA	82	82				
Malathion	↓	↓	2.77	↓	69	69				

Comments: Refer to Laboratory Control Sample/Laboratory Control Sample Duplicate findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21494Q17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer: JVG
2nd Reviewer: [illegible]

METHOD: ✓ GC ___ HPLC

Y N N/A Were all reported results recalculated and verified for all level IV samples?
Y N N/A Were all recalculated results for detected target compounds within 10% of the reported results?

Concentration= $\frac{(A)(Fv)(Df)}{(RF)(Vs \text{ or } Ws)(\%S/100)}$

A= Area or height of the compound to be measured
Fv= Final Volume of extract
Df= Dilution Factor
RF= Average response factor of the compound In the initial calibration
Vs= Initial volume of the sample
Ws= Initial weight of the sample
%S= Percent Solid

Example:

Sample ID._____ Compound Name ND

Concentration =_____

#	Sample ID	Compound	Reported Concentrations ( )	Recalculated Results Concentrations ( )	Qualifications

Comments: _____

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 29, 2009

LDC Report Date: September 18, 2009

Matrix: Soil/Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304620

Sample Identification

RSAU4-20
RSAU4-50
FB072909-SO
SA73-0.5B
SA73-30B
RSAU4-20MS
RSAU4-20MSD

Introduction

This data review covers 6 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 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/9/09	048F4801	1	Naled	24.3	RSAU4-20 RSAU4-50 SA73-0.5B SA73-30B RSAU4-20MS RSAU4-20MSD 9215329MB	J- (all detects) UJ (all non-detects)	A
8/9/09	048F4801	2	Dichlorvos	24.8	RSAU4-20 RSAU4-50 SA73-0.5B SA73-30B RSAU4-20MS RSAU4-20MSD 9215329MB	J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/6/09	010F1001	1	Mevinphos	22.2	All samples in SDG 8304620	J- (all detects) UJ (all non-detects)	P
8/6/09	010F1001	2	Mevinphos	21.1	All samples in SDG 8304620	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample FB072909-SO was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were added to all samples and blanks as required by the method. The percent 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. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304620	All compounds reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304620

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304620	RSAU4-20 RSAU4-50 SA73-0.5B SA73-30B	Naled	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304620	RSAU4-20 RSAU4-50 SA73-0.5B SA73-30B	Dichlorvos	J+ (all detects)	A	Continuing calibration (%D) (c)
8304620	RSAU4-20 RSAU4-50 FB072909-SO SA73-0.5B SA73-30B	Mevinphos	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304620	RSAU4-20 RSAU4-50 FB072909-SO SA73-0.5B SA73-30B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304620

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304620

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494T17
SDG #: 8304620
Laboratory: Test America

Date: 9/15/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer: [illegible]

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 7/29/09
IIa.	Initial calibration	A	2 RSD ≤20 2 rr
IIb.	Calibration verification/ICV	SW	CCV / ICV ≤20 2
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS / D
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	
X.	Field blanks	ND	FB = 3

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 + Water

1	RSAU4-20 S	11	9215329 MB	21		31		
2	RSAU4-50	12	9215363 MB	22		32		
3	FB072909-SO W	13		23		33		
4	SA73-0.5B S	14		24		34		
5	SA73-30B	15		25		35		
6	RSAU4-20MS	16		26		36		
7	RSAU4-20MSD	17		27		37		
8		18		28		38		
9		19		29		39		
10		20		30		40		

Notes: _____

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 21494T17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: JVG
2nd Reviewer:

METHOD: __ GC __ HPLC

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? ✓ %D or __ RPD
Y N N/A Were continuing calibration standards analyzed at the required frequencies? 20
Y N N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0%~~ 25?
Level ~~IV~~ Only
Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ~~≤15.0~~ 25)	RT (limit)	Associated Samples	Qualifications
	8/06/09	010F1001 (ICV)	Col. 1	B (-)	22.2	( )	All + Blks	J- / UJ / P (C)
				~~C (+)~~	~~21.6~~	( )		~~J+ ACTS/P~~
				~~D (-)~~	~~84.9~~	( )		~~J- / R / P~~
			Col. 2	B (-)	21.1	( )		J- / UJ / P
				~~C (+)~~	~~218.1~~	( )		~~J+ ACTS/P~~
				~~D (-)~~	~~93.1~~	( )		~~J- / R / P~~
						( )		
	8/09/09	048F4801 (CCV)	Col. 1	F (-)	24.3	( )	1, 2, 4-7, 9215329 MB	J- / UJ / A
			Col. 2	A (+)	24.8	( )		J+ ACTS/A
						( )		
						( )		
	~~8/08/09~~	~~014F1401 (CCV)~~				( )	~~3, 9215363 MB~~	
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: July 31, 2009

LDC Report Date: October 6, 2009

Matrix: Soil

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304621

Sample Identification

RSAU4-20BSPLP
RSAU4-20BSPLPRE
RSAU4-20BSPLPDI
RSAU4-50BSPLP
RSAU4-50BSPLPDI
RSAU4-20BSPLPREMS
RSAU4-20BSPLPREMSD

Introduction

This data review covers 7 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 with the following exceptions:

Sample	Analyte	Total Days From Sample Collection Until Analysis	Required Holding Time (in Days) From Sample Collection Until Analysis	Flag	A or P
RSAU4-20BSPLPRE RSAU4-20BSPLPREMS RSAU4-20BSPLPREMSD	All TCL compounds	21	14	J- (all detects) UJ (all non-detects)	A

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/14/09	040F4001	1	Naled	42.5	RSAU4-20BSPLP RSAU4-20BSPLPDI RSAU4-50BSPLP RSAU4-50BSPLPDI 9224150MB 9221012MB	J- (all detects) UJ (all non-detects)	A

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/14/09	040F4001	2	Naled	42.7	RSAU4-20BSPLP RSAU4-20BSPLPDI RSAU4-50BSPLP RSAU4-50BSPLPDI 9224150MB 9221012MB	J- (all detects) UJ (all non-detects)	A
8/25/09	003F0301	1	Dichlorvos Mevinphos	22.7 25.5	RSAU4-20BSPLPRE RSAU4-20BSPLPREMS RSAU4-20BSPLPREMSD 9232166MB	J+ (all detects) J+ (all detects)	A
8/25/09	003F0301	1	Naled	21.8	RSAU4-20BSPLPRE RSAU4-20BSPLPREMS RSAU4-20BSPLPREMSD 9232166MB	J- (all detects) UJ (all non-detects)	A
8/25/09	003F0301	2	Dichlorvos Mevinphos	31.4 29.3	RSAU4-20BSPLPRE RSAU4-20BSPLPREMS RSAU4-20BSPLPREMSD 9232166MB	J+ (all detects) J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/6/09	010F1001	1	Mevinphos	22.2	RSAU4-20BSPLPRE RSAU4-20BSPLPREMS RSAU4-20BSPLPREMSD 9232166MB	J- (all detects) UJ (all non-detects)	P
8/6/09	010F1001	2	Mevinphos	21.1	RSAU4-20BSPLPRE RSAU4-20BSPLPREMS RSAU4-20BSPLPREMSD 9232166MB	J- (all detects) UJ (all non-detects)	P

III. Blanks

Method blanks were reviewed for each matrix as applicable. No organophosphorus pesticide 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. The percent recoveries (%R) were within QC limits with the following exceptions:

Sample	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
RSAU4-20BSPLP	Not specified	Triphenylphosphate Chlormefos	38 (60-154) 31 (49-171)	All TCL compounds	J- (all detects) UJ (all non-detects)	A

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. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304621	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

*VIII. Overall Assessment of Data

The overall assessment of data was acceptable. In the case where more than one result was reported for an individual sample, the least technically acceptable results were rejected as follows:

Sample	Compound	*Flag	A or P
RSAU4-20BSPLPRE	All TCL compounds	X	A

*Corrected Flag in above table from "R" to "X".

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.

*Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304621

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304621	RSAU4-20BSPLPRE	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Technical holding times (h)
8304621	RSAU4-20BSPLP RSAU4-20BSPLPDI RSAU4-50BSPLP RSAU4-50BSPLPDI RSAU4-20BSPLPRE	Naled	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304621	RSAU4-20BSPLPRE	Dichlorvos Mevinphos	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D) (c)
8304621	RSAU4-20BSPLPRE	Mevinphos	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304621	RSAU4-20BSPLP	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Surrogate recovery (%R) (s)
8304621	RSAU4-20BSPLP RSAU4-20BSPLPRE RSAU4-20BSPLPDI RSAU4-50BSPLP RSAU4-50BSPLPDI	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)
*8304621	RSAU4-20BSPLPRE	All TCL compounds	*X	A	Overall assessment of data (0)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304621

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304621

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494U17
SDG #: 8304621
Laboratory: Test America

Date: 9/14/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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	SW	Sampling dates: 7/31/09
IIa.	Initial calibration	A	%RSD ≤ 20% r²
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	SW	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS/D
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	SW	
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

Validated Samples:

Soil

1	RSAU4-20BSPLP	11	9224150 MB	21		31	
2	RSAU4-20BSPLPRE1	12	9232166 MB	22		32	
3	RSAU4-20BSPLP~~RE2~~ DI	13	9221012~~2~~ MB	23		33	
4	RSAU4-50BSPLP	14		24		34	
5	RSAU4-50BSPLP~~RE~~ DI	15		25		35	
6	RSAU4-20BSPLPRE MS	16		26		36	
7	↓ MSD	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

LDC #: 21494U17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Technical Holding Times

Reviewer: JVG
2nd Reviewer: [illegible]

All circled dates have exceeded the technical holding times.
(Y) N N/A Were all cooler temperatures within validation criteria?

METHOD: ✓ GC ___ HPLC

Sample ID	Matrix	Preserved	Sampling Date	(Extraction date)	Analysis date	Total # of Days	Qualifier
2, 6, 7	Soil	N	7/31/09	8/21/09	8/25/09	21	J-/UJ/A (h)

TECHNICAL HOLDING TIME CRITERIA

VOLATILES:
- Water unpreserved: Aromatic within 7 days, non-aromatic within 14 days of sample collection.
- Water preserved: Both within 14 days of sample collection.
- Soils: Both within 14 days of sample collection.

EXTRACTABLES:
- Water: Extracted within 7 days, analyzed within 40 days.
- Soil: Extracted within 14 days, analyzed within 40 days.

LDC #: 21494 U17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

METHOD: ✓ GC __ HPLC

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? ✓ %D or __ RPD
Y N N/A Were continuing calibration standards analyzed at the required frequencies? 20
Y N N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0~~ 20%?
Level IV Only
Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ ~~15.0~~ 20)	RT (limit)	Associated Samples	Qualifications
	8/13/09	010F1001 (ICV)	Col. 1	C (+)	197.8	( )	1, 3-5, 9224150 MB, 9221013 MB	~~J+ Acts/P~~ (C)
			↓	D (-)	74.9	( )		J-/NJ/P
			Col. 2	C (+)	238.0	( )	↓	J+ Acts/P
			↓	D (-)	~~96.3~~	( )		J-/R/P
						( )		
						( )		
	8/06/09	010F1001 (ICV)	Col. 1	B (-)	22.2	( )	2, 6, 7, 9232166 MB	J-/NJ/P
			↓	~~C (+)~~	~~211.6~~	( )	↓	~~J+ Acts/P~~
			↓	~~D (-)~~	~~84.9~~	( )		~~J-/R/P~~
			Col. 2	B (-)	21.1	( )		J-/NJ/P
			↓	~~C (+)~~	~~218.7~~	( )		~~J+ Acts/P~~
			↓	~~D (-)~~	~~93.1~~	( )	↓	~~J-/R/P~~
						( )		
						( )		
	8/14/09	040F4001 (CCV)	Col. 1	F (-)	42.5	( )	1, 3-5, 9224150MB, 9221013 MB	J-/NJ/A
			Col. 2	F (-)	42.7	( )		↓
						( )		
						( )		
	8/25/09	003F0301 (CCV)	Col. 1	A (+)	22.7	( )	2, 6, 7, 9232166 MB	J+ Acts/A
			↓	B (+)	25.5	( )	↓	↓
			↓	F (-)	21.8	( )		J-/NJ/A
			Col. 2	A (+)	31.4	( )		J+ Acts/A
			↓	B (+)	29.3	( )	↓	↓
						( )		

LDC #: 21494 417
SDG #: See Cover

VALIDATION FINDINDS WORKSHEET
Surrogate Recovery

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [illegible]

METHOD: ✓ GC ___ HPLC
Are surrogates required by the method? Yes ✓ or No ___.
Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
Y N N/A Were surrogates spiked into all samples and blanks?
Y N N/A Did all surrogate recoveries (%R) meet the QC limits?

#	Sample ID	Detector/ Column	Surrogate Compound	%R (Limits)	Qualifications
	1	Nat spec	X	38 (60 - 154)	J- / UJ / A (S)
		↓	Z	31 (49 - 171)	↓ ↓
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
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				( )	
				( )	

	Surrogate Compound		Surrogate Compound		Surrogate Compound		Surrogate Compound		
A	Chlorobenzene (CBZ)	G	Octacosane	M	Benzo(e)Pyrene	S	1-Chloro-3-Nitrobenzene	Y	Tetrachloro-m- xylene
B	4-Bromofluorobenzene (BFB)	H	Ortho-Terphenyl	N	Terphenyl-D14	T	3,4-Dinitrotoluene	Z	Chlormefos
C	a,a,a-Trifluorotoluene	I	Fluorobenzene (FBZ)	O	Decachlorobiphenyl (DCB)	U	Tripentyltin		
D	Bromochlorobenene	J	n-Triacontane	P	1-methylnaphthalene	V	Tri-n-propyltin		
E	1,4-Dichlorobutane	K	Hexacosane	Q	Dichlorophenyl Acetic Acid (DCAA)	W	Tributyl Phosphate		
F	1,4-Difluorobenzene (DFB)	L	Bromobenzene	R	4-Nitrophenol	X	Triphenyl Phosphate		

LDC #: 21494 U17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [illegible]

METHOD: ✓ GC ___ HPLC

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

All available information pertaining to the data were reviewed using professional judgement to compliment the determination of the overall quality of the data.

(Y) N N/A Was the overall quality and usability of the data acceptable?

#	Sample # ~~Compound Name~~	Finding	Associated Samples	Qualifications
	2	outside H.T.	—	X R/A (o)

Comments: _____

OVRNew.wpd

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: August 5, 2009

LDC Report Date: September 24, 2009

Matrix: Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304622

Sample Identification

FB080409-GW

Introduction

This data review covers one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/9/09	031F3101	1	Naled Merphos	21.9 23.8	All samples in SDG 8304622	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A
8/9/09	031F3101	2	Dichlorvos	21.4	All samples in SDG 8304622	J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/6/09	010F1001	1	Mevinphos	22.2	All samples in SDG 8304622	J- (all detects) UJ (all non-detects)	P

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/6/09	010F1001	2	Mevinphos	21.1	All samples in SDG 8304622	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample FB080409-GW was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. 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.

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. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304622	All compounds reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304622

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304622	FB080409-GW	Naled Merphos	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304622	FB080409-GW	Dichlorvos	J+ (all detects)	A	Continuing calibration (%D) (c)
8304622	FB080409-GW	Mevinphos	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304622	FB080409-GW	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304622

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304622

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494V17
SDG #: 8304622
Laboratory: Test America

Date: 9/11/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 8/05/09
IIa.	Initial calibration	A	%RSD r^2
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	Client spec
IVc.	Laboratory control samples	A	LCS/D
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	
X.	Field blanks	ND	FB = 1

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:

Water

1	FB080409GW	11		21		31	
2	9217511 MB	12		22		32	
3		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	

Notes:

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,I)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 21494V17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: JVG

METHOD: ✓ GC __ HPLC

2nd Reviewer: [signature]

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? ___%D or ___RPD
Y N N/A Were continuing calibration standards analyzed at the required frequencies?
Y N N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ≤15.0%?
Level IV Only
Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ 15.0)	RT (limit)	Associated Samples	Qualifications
	8/06/09	010F1001 (ICV)	Col. 1	B (-)	22.2	( )	All + Blk	J-/UJ/P (C)
				C (+)	~~21.6~~	( )		~~J+ dets/P~~
				D (-)	~~24.9~~	( )		J-/R/P
			Col. 2	C (+)	~~18.2~~	( )		J+ dets/P
				D (-)	~~23.1~~	( )		~~J-/R/P~~
				B (-)	21.1	( )		J-/UJ/P
						( )		
	8/09/09	031F3101 (CCV)	Col. 1	F (-)	21.9	( )		J-/UJ/A
				S (-)	23.8	( )		
			Col 2	A (+)	21.4	( )		J+ dets/A
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
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Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: August 3 through August 5, 2009

LDC Report Date: September 23, 2009

Matrix: Soil/Water

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304623

Sample Identification

FB080309-SO
RSAU5-0.5B
RSAU5-50B
RSAU5-0.5BMS
RSAU5-0.5BMSD

Introduction

This data review covers 4 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 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/9/09	031F3101	1	Naled Merphos	21.9 23.8	FB080309-SO 9217511MB	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A
8/9/09	031F3101	2	Dichlorvos	21.4	FB080309-SO 9217511MB	J+ (all detects)	A
8/14/09	055F5501	1	Naled EPN	43.9 27.1	RSAU5-0.5B RSAU5-50B RSAU5-0.5BMS RSAU5-0.5BMSD 9223449MB	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A
8/14/09	055F5501	2	Naled Dimethoate Parathion-ethyl EPN	63.9 20.6 20.3 28.7	RSAU5-0.5B RSAU5-50B RSAU5-0.5BMS RSAU5-0.5BMSD 9223449MB	J- (all detects) UJ (all non-detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/6/09	010F1001	1	Mevinphos	22.2	FB080309-SO 9217511MB	J- (all detects) UJ (all non-detects)	P
8/6/09	010F1001	2	Mevinphos	21.1	FB080309-SO 9217511MB	J- (all detects) UJ (all non-detects)	P

III. Blanks

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

Sample FB080309-SO was identified as a field bank. No organophosphorus pesticide contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were added to all samples and blanks as required by the method. The percent 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. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304623	All compounds reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304623

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304623	FB080309-SO	Naled Merphos	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304623	FB080309-SO	Dichlorvos	J+ (all detects)	A	Continuing calibration (%D) (c)
8304623	RSAU5-0.5B RSAU5-50B	Naled Dimethoate Parathion-ethyl EPN	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304623	FB080309-SO	Mevinphos	J- (all detects) UJ (all non-detects)	P	Continuing calibration (ICV %D) (c)
8304623	FB080309-SO RSAU5-0.5B RSAU5-50B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304623

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304623

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494W17
SDG #: 8304623
Laboratory: Test America

Date: 9/14/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 8/03 - 05/09
IIa.	Initial calibration	A	%RSD ≤ 20% rr
IIb.	Calibration verification/ICV	SW	ICV/CCV ≤ 20 %
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS/D
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	
X.	Field blanks	ND	FB = 1

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	FB080309-SO W	11		21		31	
2	RSAU5-0.5B S	12		22		32	
3	RSAU5-50B	13		23		33	
4	RSAU5-0.5BMS	14		24		34	
5	RSAU5-0.5BMSD	15		25		35	
6	921751I MB	16		26		36	
7	9223449 MB	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 21494 W17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of ___
Reviewer: JV6
2nd Reviewer: e

METHOD: ___ GC ___ HPLC

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? ✓ %D or ___RPD
(Y) N N/A Were continuing calibration standards analyzed at the required frequencies? 20
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ~~≤15.0~~ ≤20%?
Level IV Only
Y N (N/A) Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ~~≤ 15.0~~ ≤ 20)	RT (limit)	Associated Samples	Qualifications
	8/06/09 19:10	010F1001 (ICV)	Col. 1	B (-)	22.2	( )	1, 9217511 MB	J-/UJ/P (C)
				~~C (+)~~	~~211.6~~	( )		~~J+ dets/P~~
				~~D (-)~~	~~84.9~~	( )		~~J-/R/P~~
			Col. 2	B (-)	21.1	( )		J-/UJ/P
				~~C (+)~~	~~218.1~~	( )		~~J+ dets/P~~
				~~D (-)~~	~~93.1~~	( )		~~J-/R/P~~
						( )		
						( )		
	8/13/09	010F1001 (ICV)	Col. 1	C (+)	197.8	( )	2-5, 9223449 MB	J+ dets/A
				D (-)	74.9	( )		J-/UJ/P
			Col. 2	C (+)	238.0	( )		J+ dets/P
				D (-)	96.3	( )		J-/R/P
						( )		
						( )		
	8/09/09	031F3101 (CCV)	Col. 1	F (-)	21.9	( )	1, 9217511 MB	J-/UJ/A
				S (-)	23.8	( )		
			Col. 2	A (+)	21.4	( )		J+ dets/A
						( )		
						( )		
	8/14/09	055F5501 (CCV)	Col. 1	F (-)	43.9	( )	2-5, 9223449 MB	J-/UJ/A
				X (-)	27.1	( )		
			Col. 2	F (-)	63.9	( )		
				I (-)	20.6	( )		
				Q (-)	20.3	( )		
				X (-)	28.7			

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada

Collection Date: August 3 through August 5, 2009

LDC Report Date: September 19, 2009

Matrix: Soil

Parameters: Organophosphorus Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304624

Sample Identification

RSAJ3-10BSPLP
RSAJ3-10BSPLPDI
RSAJ3-29BSPLP
RSAJ3-29BSPLPDI
RSAU5-0.5BSPLP
RSAU5-0.5BSPLPDI
RSAU5-0.5BSPLPMS
RSAU5-0.5BSPLPMSD

Introduction

This data review covers 8 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8141A for Organophosphorus Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.

JK The analytical result is an estimated maximum possible concentration (EMPC).

X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.

J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.

J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.

J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.

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 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 selected compounds.

A curve fit, based on the initial calibration, was established for quantitation for selected compounds. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were less than or equal to 20.0% with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/14/09	040F4001	1	Naled	42.5	RSAJ3-10BSPLP RSAJ3-10BSPLPDI RSAJ3-29BSPLP RSAJ3-29BSPLPDI 9224150MB 9221012MB	J- (all detects) UJ (all non-detects)	A
8/14/09	040F4001	2	Naled	42.7	RSAJ3-10BSPLP RSAJ3-10BSPLPDI RSAJ3-29BSPLP RSAJ3-29BSPLPDI 9224150MB 9221012MB	J- (all detects) UJ (all non-detects)	A
8/14/09	055F5501	1	Naled EPN	43.9 27.1	RSAU5-0.5BSPLP RSAU5-0.5BSPLPDI RSAU5-0.5BSPLPMS RSAU5-0.5BSPLPMSD 9224512MB 9224510MB	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
8/14/09	055F5501	2	Naled	47.5	RSAU5-0.5BSPLP RSAU5-0.5BSPLPDI RSAU5-0.5BSPLPMS RSAU5-0.5BSPLPMSD 9224512MB 9224510MB	J- (all detects) UJ (all non-detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

III. Blanks

Method blanks were reviewed for each matrix as applicable. No organophosphorus pesticide 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. The percent 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. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304624	All compounds reported below the PQL.	J (all detects)	A

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.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Data Qualification Summary - SDG 8304624

SDG	Sample	Compound	Flag	A or P	Reason (Code)
8304624	RSAJ3-10BSPLP RSAJ3-10BSPLPDI RSAJ3-29BSPLP RSAJ3-29BSPLPDI	Naled	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304624	RSAU5-0.5BSPLP RSAU5-0.5BSPLPDI	Naled EPN	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D) (c)
8304624	RSAJ3-10BSPLP RSAJ3-10BSPLPDI RSAJ3-29BSPLP RSAJ3-29BSPLPDI RSAU5-0.5BSPLP RSAU5-0.5BSPLPDI	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Laboratory Blank Data Qualification Summary - SDG 8304624

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Organophosphorus Pesticides - Field Blank Data Qualification Summary - SDG 8304624

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21494X17
SDG #: 8304624
Laboratory: Test America

Date: 9/15/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer:

METHOD: GC Organophosphorus Pesticides (EPA SW 846 Method 8141A)

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: 8/03-05/09
IIa.	Initial calibration	A	%RSD ≤ 20% r²
IIb.	Calibration verification/ICV	SW	CCV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS/D
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	
X.	Field blanks	NB	~~FB = EB 072109 SB from 8304616~~

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 1	RSAJ3-10B SPLP	11 1	9224150 MB	21		31	
2 2	RSAJ3-10BRE SPLP DI	12 2	9221012 MB	22		32	
3 1	RSAJ3-29B SPLP	13 3	9224512 MB	23		33	
4 2	RSAJ3-29BRE SPLP DI	14 4	9224510 MB	24		34	
5 3	RSAU5-0.5BSPLP	15		25		35	
6 4	RSAU5-0.5BSPLPRE DI	16		26		36	
7 3	RSAU5-0.5BSPLPMS	17		27		37	
8 3	RSAU5-0.5BSPLPMSD	18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

VALIDATION FINDINGS WORKSHEET

METHOD: ✓ GC ___ HPLC

8310	8330	8151	8141	8141 (Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	JJ. Thionazin	
P. Pyrene	P.		P. Fenthion	kk. Phosmet	
Q.	Q		Q. Parathion-ethyl	LL. O,O,o-Triethylphosphorothioate	
R.			R. Trichloronate	MM. Famphur	
S.			S. Merphos	NN. Carbophenothion	
			T. Stirofos	OO. Carbophenothion-methyl	
			U. Tokuthion		

Notes: _____

cmpd_list.wpd

LDC #: 21494 X17
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Reviewer: JVG
2nd Reviewer: Q

METHOD: ✓ GC ___ HPLC

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
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Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ≤ ~~15.0~~ 20 %?
Level IV Only
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#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ ~~15.0~~ ≤20)	RT (limit)	Associated Samples	Qualifications
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			↓	D (-)	74.9	( )		J-/UJ/P
			Col. 2	C (+)	238.0	( )		J+dets/P
			↓	D (-)	96.3	( )	↓	J-/R/P
						( )		
						( )		
	8/14/09	040F4001 (CCV)	Col. 1	F (-)	42.5	( )	1-4, 922450 MB, 922101 MB	J-/UJ/A
			Col. 2	F (-)	42.7	( )		↓
						( )		
						( )		
						( )		
	8/14/09	055F5501 (CCV)	Col. 1	F (-)	43.9	( )	5-8, 9224512 MB, 9224510 MB	J-/UJ/A
			↓	X (-)	27.1	( )		
			Col. 2	F (-)	47.5	( )	↓	↓
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
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