

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson
Data Validation Reports
LDC #21495**

Gasoline Range Organics

LDC

**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 22, 2009

Matrix: Soil

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903184

Sample Identification

SA35-0.5B
SA56-0.5B
SA166-0.5B
SA35-0.5BMS
SA35-0.5BMSD

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 8015B for Gasoline Range Organics.

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.
- UU 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 as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) 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 R0903184	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
Gasoline Range Organics - Data Qualification Summary - SDG R0903184**

SDG	Sample	Compound	Flag	A or P	Reason
R0903184	SA35-0.5B SA56-0.5B SA166-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0903184**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0903184**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 21495F7

SDG #: R0903184

Laboratory: Columbia Analytical Services

Stage 2B

Date: 9/17/09

Page: 1 of 1

Reviewer: SVG

2nd Reviewer: [Signature]

METHOD: GC Gasoline Range Organics (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: <u>6/10 - 11/09</u>
IIa.	Initial calibration	A	
IIb.	Calibration verification <u>ICV</u>	A	<u>CV ≤ 20%</u>
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	<u>LCS</u>
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:

501

1	SA35-0.5B	11	<u>157737 MB</u>	21		31
2	SA56-0.5B	12		22		32
3	SA166-0.5B	13		23		33
4	SA35-0.5BMS	14		24		34
5	SA35-0.5BMSD	15		25		35
6		16		26		36
7		17		27		37
8		18		28		38
9		19		29		39
10		20		30		40

Notes: (no ICV)

**Laboratory Data Consultants, Inc.
Data Validation Report**

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

Collection Date: June 19 through June 24, 2009

LDC Report Date: September 22, 2009

Matrix: Soil

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903443

Sample Identification

SA104-0.5B
SA129-0.5B
SA70-0.5B
SA53-0.5B
SA200-0.5B
RSAO6-0.5B
SA51-0.5B
SA53-0.5BMS
SA53-0.5BMSD

Introduction

This data review covers 9 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Gasoline Range Organics.

This review follows 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.
- UU 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 as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) 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 R0903443	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
Gasoline Range Organics - Data Qualification Summary - SDG R0903443**

SDG	Sample	Compound	Flag	A or P	Reason
R0903443	SA104-0.5B SA129-0.5B SA70-0.5B SA53-0.5B SA200-0.5B RSA06-0.5B SA51-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0903443**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0903443**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21495G7

VALIDATION COMPLETENESS WORKSHEET

SDG #: R0903443

Stage 2B

Laboratory: Columbia Analytical Services

Date: 9/16/09

Page: 1 of 1

Reviewer: SVC

2nd Reviewer: [Signature]

METHOD: GC Gasoline Range Organics (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: <u>6/19-24/09</u>
IIa.	Initial calibration	A	
IIb.	Calibration verification/ <u>ICV</u>	A	<u>COV ≤ 20 %</u>
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	<u>LCS</u>
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: Soil

1	SA104-0.5B	<u>11</u>	<u>158934 MB</u>	21		31
2	SA129-0.5B	<u>12</u>	<u>159680 MB</u>	22		32
3	SA70-0.5B	13		23		33
4	SA53-0.5B	14		24		34
5	SA200-0.5B	15		25		35
6	RSAO6-0.5B	16		26		36
7	SA51-0.5B	17		27		37
8	SA53-0.5BMS	18		28		38
9	SA53-0.5BMSD	19		29		39
10		20		30		40

Notes: (no ICV)

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: June 30, 2009

LDC Report Date: September 22, 2009

Matrix: Soil

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903615

Sample Identification

SA50-0.5B
SA106-0.5B
SA102-0.5B
SA109-0.5B
SA106-0.5BMS
SA106-0.5BMSD

Introduction

This data review covers 6 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Gasoline Range Organics.

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.
- UU 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 as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) 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 R0903615	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
Gasoline Range Organics - Data Qualification Summary - SDG R0903615**

SDG	Sample	Compound	Flag	A or P	Reason
R0903615	SA50-0.5B SA106-0.5B SA102-0.5B SA109-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0903615**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0903615**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 21495H7

SDG #: R0903615

Laboratory: Columbia Analytical Services

Stage 2B

Date: 9/12/09

Page: 1 of 1

Reviewer: JVG

2nd Reviewer: [Signature]

METHOD: GC Gasoline Range Organics (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: <u>6/30/09</u>
IIa.	Initial calibration	A	
IIb.	Calibration verification/ <u>ICV</u>	A	<u>CV ≤ 20%</u>
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	<u>LCS</u>
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:

Soil

1	SA50-0.5B	11	<u>160246 MB</u>	21		31	
2	SA106-0.5B	12		22		32	
3	SA102-0.5B	13		23		33	
4	SA109-0.5B	14		24		34	
5	SA106-0.5BMS	15		25		35	
6	SA106-0.5BMSD	16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

**Laboratory Data Consultants, Inc.
Data Validation Report**

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

Collection Date: July 1, 2009

LDC Report Date: September 22, 2009

Matrix: Soil/Water

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903678

Sample Identification

EB070109-SO1
SA114-0.5B
SA114009-0.5B

Introduction

This data review covers 2 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 8015B for Gasoline Range Organics.

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.
- UU 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 as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

III. Blanks

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

Sample EB070109-SO1 was identified as an equipment blank. No gasoline range organic 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. All surrogate 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) 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 R0903678	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
Gasoline Range Organics - Data Qualification Summary - SDG R0903678**

SDG	Sample	Compound	Flag	A or P	Reason
R0903678	EB070109-SO1 SA114-0.5B SA114009-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG
R0903678**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG
R0903678**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 2149517

SDG #: R0903678

Laboratory: Columbia Analytical Services

Stage 2B

Date: 9/18/09

Page: 1 of 1

Reviewer: SVL

2nd Reviewer: [Signature]

METHOD: GC Gasoline Range Organics (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: <u>7/01/09</u>
IIa.	Initial calibration	A	
IIb.	Calibration verification/ <u>ICV</u>	A	<u>COV ≤ 20%</u>
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	<u>client spec</u>
IVc.	Laboratory control samples	A	<u>LCS</u>
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	<u>D = 2, 3</u>
X.	Field blanks	ND	<u>EB = 1</u>

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	EB070109-SO1	W	11	160456 MB	21	31
2	SA114-0.5B	D	12	160246 MB	22	32
3	SA114009-0.5B	D	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: (non Area 1)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson
Data Validation Reports
LDC #21495**

TPH as Extractables



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 29, 2009

Matrix: Soil

Parameters: Total Petroleum Hydrocarbons as Extractables

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903051

Sample Identification

RSA12-0.5B SA88-0.5BMSD
RSAI3-0.5B
RSAJ5-0.5B
RSAK5-0.5B
SA76-0.5B
SA76009-0.5B
RSAL3-0.5B
SA100-0.5B
RSAM3-0.5B
RSAM2-0.5B
SA189-0.5B
SA88-0.5B
SA152-0.5B
SA152009-0.5B
RSAJ2-0.5B
RSAJ3-0.5B
SA202-0.5B
RSAJ5-0.5BMS
RSAJ5-0.5BMSD
SA88-0.5BMS

Introduction

This data review covers 21 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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.
- UU 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 as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits with the following exceptions:

Date	Compound	%D	Associated Samples	Flag	A or P
6/8/09	Oil range organics	20.4	RSAI3-0.5B RSAJ5-0.5B RSAK5-0.5B SA76-0.5B SA76009-0.5B RSAL3-0.5B SA100-0.5B RSAM3-0.5B RSAJ5-0.5BMS RSAJ5-0.5BMSD	J+ (all detects)	A
6/9/09	Oil range organics	23.5	RSAM2-0.5B	J+ (all detects)	A

The percent difference (%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 total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

Sample FB072109-SO (from SDG R0904016) was identified as a field blank. No total petroleum hydrocarbons as extractable 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. All surrogate recoveries (%R) were within QC limits.

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903051	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 SA76-0.5B and SA76009-0.5B, samples SA152-0.5B and SA152009-0.5B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA76-0.5B	SA76009-0.5B				
Diesel range organics	42000	43000U	-	1000 (≤ 43000)	-	-

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG
 R0903051**

SDG	Sample	Compound	Flag	A or P	Reason
R0903051	RSAI3-0.5B RSAJ5-0.5B RSAK5-0.5B SA76-0.5B SA76009-0.5B RSAL3-0.5B SA100-0.5B RSAM3-0.5B RSAM2-0.5B	Oil range organics	J+ (all detects)	A	Continuing calibration (%D) (c)
R0903051	RSA12-0.5B RSAI3-0.5B RSAJ5-0.5B RSAK5-0.5B SA76-0.5B SA76009-0.5B RSAL3-0.5B SA100-0.5B RSAM3-0.5B RSAM2-0.5B SA189-0.5B SA88-0.5B SA152-0.5B SA152009-0.5B RSAJ2-0.5B RSAJ3-0.5B SA202-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification
 Summary - SDG R0903051**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification
 Summary - SDG R0903051**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 21495C8

SDG #: R0903051

Laboratory: Columbia Analytical Services

Stage 2B

Date: 9/16/09

Page: 1 of 1

Reviewer: JVG

2nd Reviewer: [Signature]

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/01 - 04/09
IIa.	Initial calibration	A	
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	SW	D ₁ = 5.6 *D ₂ = 13.14
X.	Field blanks	ND	FB = FB072109-50 from R 0904016

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 soils

1	RSA12-0.5B	11	SA189-0.5B	21	SA88-0.5BMSD	31	88788 MB
2	RSAI3-0.5B	12	SA88-0.5B	22		32	88924 MB
3	RSAJ5-0.5B	13	SA152-0.5B	23		33	
4	RSAK5-0.5B	14	SA152009-0.5B	24		34	
5	SA76-0.5B	15	RSAJ2-0.5B	25		35	
6	SA76009-0.5B	16	RSAJ3-0.5B	26		36	
7	RSAL3-0.5B	17	SA202-0.5B	27		37	
8	SA100-0.5B	18	RSAJ5-0.5BMS	28		38	
9	RSAM3-0.5B	19	RSAJ5-0.5BMSD	29		39	
10	RSAM2-0.5B	20	SA88-0.5BMS	30		40	

Notes: (No changes to original results)

VALIDATION FINDINGS WORKSHEET
 Field Duplicates

METHOD: GC HPLC

Were field duplicate pairs identified in this SDG?
 Were target compounds detected in the field duplicate pairs?

Compound	Concentration (ug/kg)		%RPD Limit	Qualification
	5	6		
DRO	42000	43000 U	1000 (± 43000 Diff)	Parent only / All Samples

Compound	Concentration ()		%RPD Limit	Qualification
				Parent only / All Samples

Compound	Concentration ()		%RPD Limit	Qualification
				Parent only / All Samples

Compound	Concentration ()		%RPD Limit	Qualification
				Parent only / All Samples

(43000 - MRL → lab reported 33000 U at MRL)

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: June 5 through June 11, 2009

LDC Report Date: October 2, 2009

Matrix: Soil

Parameters: Total Petroleum Hydrocarbons as Extractables

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903184

Sample Identification

SA127-0.5B	RSAO3-0.5BMSD
RSAJ6-0.5B	SA166-0.5BMS
RSAK6-0.5B	SA166-0.5BMSD
RSAK8-0.5B	
RSAL7-0.5B	
RSAL8-0.5B	
SA35-0.5B	
SA55-0.5B	
SA56-0.5B	
SA176-0.5B	
RSAO3-0.5B	
SA182-0.5B	
SA201-0.5B	
SA166-0.5B	
RSAK4-0.5B	
RSAK4009-0.5B	
SA134-0.5B	
SA127-0.5BMS	
SA127-0.5BMSD	
RSAO3-0.5BMS	

Introduction

This data review covers 23 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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 as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%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 total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903184	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 RSAK4-0.5B and RSAK4009-0.5B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG
 R0903184**

SDG	Sample	Compound	Flag	A or P	Reason
R0903184	SA127-0.5B RSAJ6-0.5B RSAK6-0.5B RSAK8-0.5B RSAL7-0.5B RSAL8-0.5B SA35-0.5B SA55-0.5B SA56-0.5B SA176-0.5B RSAO3-0.5B SA182-0.5B SA201-0.5B SA166-0.5B RSAK4-0.5B RSAK4009-0.5B SA134-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification
 Summary - SDG R0903184**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification
 Summary - SDG R0903184**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 21495F8

SDG #: R0903184

Laboratory: Columbia Analytical Services

Stage 2B

Date: 9/17/09

Page: 1 of 1

Reviewer: *[Signature]*

2nd Reviewer: *[Signature]*

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/05 - 11/09
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	A	COV/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	ND	D = 15, 16
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	SA127-0.5B	11	RSA03-0.5B	21	RSA03-0.5BMSD	31	89052 MB
2	RSAJ6-0.5B	12	SA182-0.5B	22	SA166-0.5BMS	32	89352
3	RSAK6-0.5B	13	SA201-0.5B	23	SA166-0.5BMSD	33	89403
4	RSAK8-0.5B	14	SA166-0.5B	24		34	
5	RSAL7-0.5B	15	RSAK4-0.5B	25		35	
6	RSAL8-0.5B	16	RSAK4009-0.5B	26		36	
7	SA35-0.5B	17	SA134-0.5B	27		37	
8	SA55-0.5B	18	SA127-0.5BMS	28		38	
9	SA56-0.5B	19	SA127-0.5BMSD	29		39	
10	SA176-0.5B	20	RSA03-0.5BMS	30		40	

Notes: #9 ORO changed from 130000 to 170000

#12 ORO changed from 47000 to 62000

(#17 - RSA 03
↳ letter not #)

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: July 19 through July 24, 2009

LDC Report Date: September 22, 2009

Matrix: Soil

Parameters: Total Petroleum Hydrocarbons as Extractables

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903443

Sample Identification

SA198-0.5B SA150-0.5BMSD
SA64-0.5B
SA104-0.5B
SA129-0.5B
SA70-0.5B
SA150-0.5B
RSAN5-0.5B
SA53-0.5B
SA201-10B
SA201-28B
SA201009-28B
SA43009-0.5B
SA40-0.5B
SA200-0.5B
RSAO6-0.5B
SA51-0.5B
SA43-0.5B
SA70-0.5BMS
SA70-0.5BMSD
SA150-0.5BMS

Introduction

This data review covers 21 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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.
- UU 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 as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%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 total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

Sample FB072109-SO (from SDG R0904016) was identified as a field blank. No total petroleum hydrocarbons as extractable 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. All surrogate recoveries (%R) were within QC limits.

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903443	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 SA201-28B and SA201009-28B and samples SA43009-0.5B and SA43-0.5B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG
 R0903443**

SDG	Sample	Compound	Flag	A or P	Reason
R0903443	SA198-0.5B SA64-0.5B SA104-0.5B SA129-0.5B SA70-0.5B SA150-0.5B RSAN5-0.5B SA53-0.5B SA201-10B SA201-28B SA201009-28B SA43009-0.5B SA40-0.5B SA200-0.5B RSAO6-0.5B SA51-0.5B SA43-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification
 Summary - SDG R0903443**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification
 Summary - SDG R0903443**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21495G8

VALIDATION COMPLETENESS WORKSHEET

SDG #: R0903443

Stage 2B

Laboratory: Columbia Analytical Services

Date: 9/16/09

Page: 1 of 1

Reviewer: JVB

2nd Reviewer: [Signature]

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/19 - 24/09
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	A	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	ND	* D ₁ = 10, 11 D ₂ = 12, 17
X.	Field blanks	ND	FB = FB072109-50 from R09040164

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

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

Validated Samples:

(57)

1	SA198-0.5B	11	SA201009-28B	D ₁	21	SA150-0.5BMSD	31	89986 MB
2	SA64-0.5B	12	SA43009-0.5B	D ₂	22		32	90259 MB
3	SA104-0.5B	13	SA40-0.5B		23		33	
4	SA129-0.5B	14	SA200-0.5B		24		34	
5	SA70-0.5B	15	RSA06-0.5B		25		35	
6	SA150-0.5B	16	SA51-0.5B		26		36	
7	RSAN5-0.5B	17	SA43-0.5B	D ₂	27		37	
8	SA53-0.5B	18	SA70-0.5BMS		28		38	
9	SA201-10B	19	SA70-0.5BMSD		29		39	
10	SA201-28B	D ₁	20	SA150-0.5BMS	30		40	

Notes: zero values changed for # 4, 5, 12, 13

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: June 29 through June 30, 2009

LDC Report Date: September 22, 2009

Matrix: Soil

Parameters: Total Petroleum Hydrocarbons as Extractables

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903615

Sample Identification

SA45-0.5B
SA452009-0.5B
SA187-0.5
SA153-0.5B
SA186-0.5B
SA185-0.5B
SA185-0.5BRE
RSAO5-0.5B
SA152-10B
SA152-20B
SA152-34B
SA50-0.5B
SA54-0.5B
SA106-0.5B
SA102-0.5B
SA109-0.5B
SA45-0.5BMS
SA45-0.5BMSD
SA106-0.5BMS
SA106-0.5BMSD

Introduction

This data review covers 20 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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 as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%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 total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

Sample	Surrogate	%R (Limits)	Compound	Flag	A or P
SA185-0.5B	ortho-Terphenyl	43 (55-116)	TPH as extractables	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 R0903615	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
SA185-0.5B	All TCL compounds	X	A

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

IX. Field Duplicates

Samples SA45-0.5B and SA452009-0.5B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA45-0.5B	SA452009-0.5B				
Diesel range organics	130000	130000	-	0 (≤ 42000)	-	-
Oil range organics	53000	50000	-	3000 (≤ 42000)	-	-

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG
 R0903615**

SDG	Sample	Compound	Flag	A or P	Reason
R0903615	SA185-0.5B	TPH as extractables	J- (all detects) UJ (all non-detects)	A	Surrogate recovery (%R) (s)
R0903615	SA45-0.5B SA452009-0.5B SA187-0.5 SA153-0.5B SA186-0.5B SA185-0.5B SA185-0.5BRE RSAO5-0.5B SA152-10B SA152-20B SA152-34B SA50-0.5B SA54-0.5B SA106-0.5B SA102-0.5B SA109-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
R0903615	SA185-0.5B	TPH as extractables	X	A	Overall assessment of data (o)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification
 Summary - SDG R0903615**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification
 Summary - SDG R0903615**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 21495H8

SDG #: R0903615

Laboratory: Columbia Analytical Services

Stage 2B

Date: 9/18/09

Page: 1 of 1

Reviewer: [Signature]

2nd Reviewer: [Signature]

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: <u>6/29 - 30/09</u>
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	A	<u>CV/ICV ≤ 20%</u>
III.	Blanks	A	
IVa.	Surrogate recovery	SW	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	<u>LCS 1/D</u>
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	SW	
IX.	Field duplicates	SW	<u>b = 1, 2</u>
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	SA45-0.5B	<u>D</u>	11	SA152-34B	21	<u>90591 MB</u>	31	
2	SA452009-0.5B	<u>b</u>	12	SA50-0.5B	22	<u>90696</u>	32	
3	SA187-0.5		13	SA54-0.5B	23		33	
4	SA153-0.5B		14	SA106-0.5B	24		34	
5	SA186-0.5B		15	SA102-0.5B	25		35	
6	SA185-0.5B		16	SA109-0.5B	26		36	
7	SA185-0.5BRE		17	SA45-0.5BMS	27		37	
8	RSOA5-0.5B		18	SA45-0.5BMSD	28		38	
9	SA152-10B		19	SA106-0.5BMS	29		39	
10	SA152-20B		20	SA106-0.5BMSD	30		40	

Notes: _____

VALIDATION FINDINGS WORKSHEET
 Field Duplicates

METHOD: GC HPLC

Were field duplicate pairs identified in this SDG?
 Were target compounds detected in the field duplicate pairs?

Y/N N/A
 X/N N/A

Compound	Concentration ($\mu\text{g/kg}$)		%RPD Limit	Qualification Parent only / All Samples
	1	2		
DRD	130 000	130 000	0 ($\leq 42000 \text{ diff}$)	
ORD	53 000	50 000	3 000	

Compound	Concentration ()		%RPD Limit	Qualification Parent only / All Samples

Compound	Concentration ()		%RPD Limit	Qualification Parent only / All Samples

Compound	Concentration ()		%RPD Limit	Qualification Parent only / All Samples

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: July 1 through July 2, 2009

LDC Report Date: September 22, 2009

Matrix: Soil/Water

Parameters: Total Petroleum Hydrocarbons as Extractables

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903678

Sample Identification

EB070109-SO1	SA82-0.5BMS
SA114-0.5B	SA82-0.5BMSD
SA114009-0.5B	RSAK3-31BMS
RSAN6-0.5B	RSAK3-31BMSD
SA82-0.5B	
SA82-10B	
SA82-29B	
RSAL3-10B	
RSAL3-30B	
SA134-10B	
SA134-20B	
SA134-31B	
SA134009-31B	
SA88-10B	
SA88-20B	
SA88-32B	
RSAK3-0.5B	
RSAK3-10B	
RSAK3-20B	
RSAK3-31B	

Introduction

This data review covers 23 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 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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.
- UU 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 as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%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 total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

Sample EB070109-SO1 was identified as an equipment blank. No total petroleum hydrocarbons as extractable 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. All surrogate recoveries (%R) were within QC limits.

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903678	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 SA114-0.5B and SA114009-0.5B and samples SA134-31B and SA134009-31B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA114-0.5B	SA114009-0.5B				
Diesel range organics	110000	100000	-	10000 (≤ 44000)	-	-
Oil range organics	110000	99000	-	11000 (≤ 44000)	-	-

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG
 R0903678**

SDG	Sample	Compound	Flag	A or P	Reason
R0903678	EB070109-SO1 SA114-0.5B SA114009-0.5B RSAN6-0.5B SA82-0.5B SA82-10B SA82-29B RSAL3-10B RSAL3-30B SA134-10B SA134-20B SA134-31B SA134009-31B SA88-10B SA88-20B SA88-32B RSAK3-0.5B RSAK3-10B RSAK3-20B RSAK3-31B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification
 Summary - SDG R0903678**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification
 Summary - SDG R0903678**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 2149518

SDG #: R0903678

Laboratory: Columbia Analytical Services

Stage 2B

Date: 9/18/09

Page: 1 of 1

Reviewer: JVL

2nd Reviewer: [Signature]

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

Validation Area		Comments
I.	Technical holding times	A Sampling dates: 7/01-02/09
IIa.	Initial calibration	A
IIb.	Calibration verification/ICV	A CCV/ICV ≤ 20%
III.	Blanks	A
IVa.	Surrogate recovery	A
IVb.	Matrix spike/Matrix spike duplicates	A
IVc.	Laboratory control samples	A LCS / b
V.	Target compound identification	N
VI.	Compound Quantitation and CRQLs	N
VII.	System Performance	N
VIII.	Overall assessment of data	A
IX.	Field duplicates	SW D ₁ = 2, 3 D ₂ = 12, 13
X.	Field blanks	ND EB = 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 + Soil

1	EB070109-SO1	W	11	SA134-20B	S	21	SA82-0.5BMS	S	31	90934 MB
2	SA114-0.5B	D ₁	12	SA134-31B	D ₂	22	SA82-0.5BMSD		32	90801 ↓
3	SA114009-0.5B	D ₁	13	SA134009-31B	D ₂	23	RSK3-31BMS		33	90882 ↓
4	RSAN6-0.5B		14	SA88-10B		24	RSK3-31BMSD		34	
5	SA82-0.5B		15	SA88-20B		25			35	
6	SA82-10B		16	SA88-32B		26			36	
7	SA82-29B		17	RSK3-0.5B		27			37	
8	RSAL3-10B		18	RSK3-10B		28			38	
9	RSAL3-30B		19	RSK3-20B		29			39	
10	SA134-10B		20	RSK3-31B		30			40	

Notes: _____

LDC #: 21495 J8
 SDG #: See Gary

VALIDATION FINDINGS WORKSHEET
 Field Duplicates

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

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 ($\mu\text{g}/\text{kg}$)		%RPD Limit	Qualification Parent only / All Samples
	2	3		
DRD	110000	100000	10000 ($\leq 44000 \text{ PPH}$)	
ORD	75000	99000	11000	
		64000	11000	

Compound	Concentration ()		%RPD Limit	Qualification Parent only / All Samples

**Laboratory Data Consultants, Inc.
Data Validation Report**

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

Collection Date: June 25 through June 30, 2009

LDC Report Date: September 24, 2009

Matrix: Soil/Water

Parameters: Total Petroleum Hydrocarbons as Extractables

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903584

Sample Identification

SA202-10B
SA202-28B
RSAI3-10B
RSAI3-20B
RSAI3-32B
SA188-0.5B
SA172-0.5B
SA41-0.5B
SA44-0.5B
SA42-0.5B
RSAI2-10B
RSAI2009-10B
RSAI2-20B
RSAI2-31B
RSAJ2-10B
RSAJ2-20B
RSAJ2-33B
RSAJ2009-33B
EB062609-SO
RSAJ2-20BMS
RSAJ2-20BMSD

Introduction

This data review covers 20 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 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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.
- UU 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 as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%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 total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

Sample EB062609-SO was identified as an equipment blank. No total petroleum hydrocarbons as extractable 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. All surrogate recoveries (%R) were within QC limits.

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903584	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 RSAI2-10B and RSAI2009-10B and samples RSAJ2-33B and RSAJ2009-33B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG
 R0903584**

SDG	Sample	Compound	Flag	A or P	Reason
R0903584	SA202-10B SA202-28B RSAI3-10B RSAI3-20B RSAI3-32B SA188-0.5B SA172-0.5B SA41-0.5B SA44-0.5B SA42-0.5B RSAI2-10B RSAI2009-10B RSAI2-20B RSAI2-31B RSAJ2-10B RSAJ2-20B RSAJ2-33B RSAJ2009-33B EB062609-SO	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification
 Summary - SDG R0903584**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification
 Summary - SDG R0903584**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21495K8

VALIDATION COMPLETENESS WORKSHEET

SDG #: R0903584

Stage 2B

Laboratory: Columbia Analytical Services

Date: 9/21/09

Page: 1 of 1

Reviewer: JVG

2nd Reviewer: [Signature]

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/25 - 30/09
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	A	COV/IAV ≤ 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	ND	D ₁ = 11, 12 D ₂ = 17, 18
X.	Field blanks	ND	EB = 19

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	SA202-10B	Σ	11	RSAI2-10B	D ₁	Σ	21	RSAJ2-20BMSD	Σ	37	90359 MB
2	SA202-28B		12	RSAI2009-10B	D ₁		22			32	90591 ↓
3	RSAI3-10B		13	RSAI2-20B			23			33	90635 ↓
4	RSAI3-20B		14	RSAI2-31B			24			34	
5	RSAI3-32B		15	RSAJ2-10B			25			35	
6	SA188-0.5B		16	RSAJ2-20B			26			36	
7	SA172-0.5B		17	RSAJ2-33B	D ₂		27			37	
8	SA41-0.5B		18	RSAJ2009-33B	b✓		28			38	
9	SA44-0.5B		19	EB062609-SO			29			39	
10	SA42-0.5B	✓	20	RSAJ2-20BMS		Σ	30			40	

Notes: _____

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 7, 2009

LDC Report Date: September 24, 2009

Matrix: Soil

Parameters: Total Petroleum Hydrocarbons as Extractables

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903729

Sample Identification

SA206-0.5B
SA206-10B
SA206-25B
SA206-30B
RSAK4-10B
RSAK4-20B
RSAK4-31B
RSAL4-0.5B
RSAL4009-0.5B
RSAL4-10B
RSAL4-28B
SA100-10B
SA100-30B
SA69-0.5B
SA69-10B
SA69-29B
SA206-30BMS
SA206-30BMSD
SA100-10BMS
SA100-10BMSD

Introduction

This data review covers 20 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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.
- UU 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 as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%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 total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903729	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 RSAL4-0.5B and RSAL4009-0.5B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG
 R0903729**

SDG	Sample	Compound	Flag	A or P	Reason
R0903729	SA206-0.5B SA206-10B SA206-25B SA206-30B RSAK4-10B RSAK4-20B RSAK4-31B RSAL4-0.5B RSAL4009-0.5B RSAL4-10B RSAL4-28B SA100-10B SA100-30B SA69-0.5B SA69-10B SA69-29B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification
 Summary - SDG R0903729**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
 Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification
 Summary - SDG R0903729**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 21495L8

SDG #: R0903729

Laboratory: Columbia Analytical Services

Date: 9/23/09

Page: 1 of 1

Reviewer: *JF*

2nd Reviewer: _____

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 7/06 - 07/09
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	A	CV/ICV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS 1b
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 = 8, 9
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	SA206-0.5B	11	RSAL4-28B	21	90882 MB	31
2	SA206-10B	12	SA100-10B	22	90954 MB	32
3	SA206-25B	13	SA100-30B	23		33
4	SA206-30B	14	SA69-0.5B	24		34
5	RSAK4-10B	15	SA69-10B	25		35
6	RSAK4-20B	16	SA69-29B	26		36
7	RSAK4-31B	17	SA206-30BMS	27		37
8	RSAL4-0.5B	18	SA206-30BMSD	28		38
9	RSAL4009-0.5B	19	SA100-10BMS	29		39
10	RSAL4-10B	20	SA100-10BMSD	30		40

Notes: _____
