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

Semivolatiles

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2209 Phase B Investigation, Henderson, Nevada

Collection Date: May 27 through June 4, 2209

LDC Report Date: September 28, 2009

Matrix: Water

Parameters: Semivolatiles

Validation Level: Stage 4

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903006

Sample Identification

MC-3B
MC-3BRE
EB052709
EB052709RE
M-127B
M-127BRE
FB060409

Introduction

This data review covers 7 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

This review follows 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 V.

Field duplicates are summarized in Section XVI.

The following are definitions of the data qualifiers:

J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.

J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.

J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.

U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.

R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.

UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

P Indicates the finding is related to a protocol/contractual deviation.

None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met with the following exceptions:

Sample	Compound	Total Days From Sample Collection Until Extraction	Required Holding Time (in Days) From Sample Collection Until Extraction	Flag	A or P
MC-3BRE EB052709RE	All TCL compounds	11	7	J- (all detects) UJ (all non-detects)	A
M-127BRE	All TCL compounds	10	7	J- (all detects) UJ (all non-detects)	A

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

II. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

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

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

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
5/22/09	Octachlorostyrene	0.048 (≥0.05)	All samples in SDG R0903006	J (all detects) UJ (all non-detects)	A

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

All of the continuing calibration RRF values were greater than or equal to 0.05 .

V. Blanks

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

Samples EB052709 and EB052709RE were identified as equipment blanks. No semivolatile contaminants were found in these blanks with the following exceptions:

Equipment Blank ID	Sampling Date	Compound	Concentration	Associated Samples
EB052709	5/27/09	Diethylphthalate	0.23 ug/L	MC-3B MC-3BRE

Sample FB060409 was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB060409	6/4/09	Butylbenzylphthalate Di-n-butylphthalate Diethylphthalate	0.12 ug/L 0.78 ug/L 0.28 ug/L	MC-3B MC-3BRE M-127B M-127BRE

Sample concentrations were compared to concentrations detected in the field blanks as required by the QAPP. No sample data was qualified.

VI. Surrogate Spikes

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

Sample	Surrogate	%R (Limits)	Compound	Flag	A or P
156625MB	2-Fluorobiphenyl Nitrobenzene-d5 2-Fluorobiphenyl	32 (45-135) 29 (45-135) 31 (45-135)	All TCL compounds	J- (all detects) UJ (all non-detects)	P

VII. 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.

VIII. Laboratory Control Samples (LCS)

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

LCS ID (Associated Samples)	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
157385LCS/D (MC-3BRE EB052709RE M-127BRE FB060409 157385MB)	Pyridine	37 (50-120)	27 (50-120)	32 (≤30)	J (all detects) UJ (all non-detects)	P
157385LCS/D (MC-3BRE EB052709RE M-127BRE FB060409 157385MB)	1,4-Dioxane	43 (50-120)	47 (50-120)	-	J- (all detects) UJ (all non-detects)	P

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

All target compound identifications were within validation criteria.

XII. Project Quantitation Limit

All project quantitation limits were within validation criteria.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R2844538	All compounds reported below the PQL.	J (all detects)	A

XIII. Tentatively Identified Compounds (TICs)

Tentatively identified compounds were not reported by the laboratory.

XIV. System Performance

The system performance was acceptable.

XV. Overall Assessment

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
MC-3BRE EB052709RE M-127BRE	All TCL compounds	X	A

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

XVI. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2209 Phase B Investigation, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG R0903006

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903006	MC-3BRE EB052709RE M-127BRE	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Technical holding times (h)
R0903006	MC-3B MC-3BRE EB052709 EB052709RE M-127B M-127BRE FB060409	Octachlorostyrene	J (all detects) UJ (all non-detects)	A	Initial calibration (RRF) (c)
R0903006	MC-3BRE EB052709RE M-127BRE FB060409	Pyridine	J (all detects) UJ (all non-detects)	P	Laboratory control samples (%R) (l, ld)
R0903006	MC-3BRE EB052709RE M-127BRE FB060409	1,4-Dioxane	J- (all detects) UJ (all non-detects)	P	Laboratory control samples (%R) (l)
R0903006	MC-3B MC-3BRE EB052709 EB052709RE M-127B M-127BRE FB060409	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
R0903006	MC-3BRE EB052709RE M-127BRE	All TCL compounds	X	A	Overall assessment of data (o)

Tronox LLC Facility, 2209 Phase B Investigation, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG R0903006

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2209 Phase B Investigation, Henderson, Nevada
Semivolatiles- Field Blank Data Qualification Summary - SDG R0903006

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 4

LDC #: 21495B2a
SDG #: R0903006
Laboratory: Columbia Analytical Services

Date: 9/16/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer: Q

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

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

	Validation Area		Comments
I.	Technical holding times	SW	Sampling dates: 5/27-28/09, 6/04/09
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	SW	%RSD
IV.	Continuing calibration/ICV	~~JVG~~ SW/A	CCV/ICV ≤ 25 %
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	N	Client Spec
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	A	
XII.	Compound quantitation/CRQLs	A	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	A	
XV.	Overall assessment of data	SW	
XVI.	Field duplicates	N	
XVII.	Field blanks	SW	*EB = 3, 4 FB = 7

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

Validated Samples: Water

1	MC-3B	11	156625 MB	21	Ext = 88595	31	
2	MC-3BRE	12	157385	22	= 88943	32	
3	EB052709	13		23		33	
4	EB052709RE	14		24		34	
5	M-127B	15		25		35	
6	M-127BRE	16		26		36	
7	FB060409	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

(no r2)

LDC #: 21495 B2a
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVG
2nd Reviewer:

Method: Semivolatiles (EPA SW 846 Method 8270C)

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.		✓		
Cooler temperature criteria was met.	✓			
II. GC/MS Instrument performance check				
Were the DFTPP performance results reviewed and found to be within the specified criteria?	✓			
Were all samples analyzed within the 12 hour clock criteria?	✓			
III. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Were all percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCCs and SPCCs?	✓			
Was a curve fit used for evaluation?		✓		
Did the initial calibration meet the curve fit acceptance criteria of ≥ 0.990?			✓	
Were all percent relative standard deviations (%RSD) ≤ 30% and relative response factors (RRF) ≥ 0.05?		✓		
IV. Continuing calibration				
Was a continuing calibration standard analyzed at least once every 12 hours for each instrument?	✓			
Were all percent differences (%D) and relative response factors (RRF) within method criteria for all CCCs and SPCCs?	✓			
Were all percent differences (%D) ≤ 25% and relative response factors (RRF) ≥ 0.05?		✓		
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed for each matrix and concentration?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
VI. Surrogates				
Were all surrogate %R within QC limits?		✓		
If 2 or more base neutral or acid surrogates were outside QC limits, was a reanalysis performed to confirm %R?	NA ✓			
If any %R was less than 10 percent, was a reanalysis performed to confirm %R?	✓			
VII. Matrix Spike/Matrix spike duplicates				
Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.		✓		
Was a MS/MSD analyzed every 20 samples of each matrix?		✓		
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?			✓	
VIII. Laboratory control samples				
Was an LCS analyzed for this SDG?	✓			

LDC #: 21495 B2a
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JV6
2nd Reviewer:

Validation Area	Yes	No	NA	Findings/Comments
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?		✓		
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
X. Internal standards				
Were internal standard area counts within -50% or +100% of the associated calibration standard?	✓			
Were retention times within ± 30 seconds from the associated calibration standard?	✓			
XI. Target compound identification				
Were relative retention times (RRT's) within ± 0.06 RRT units of the standard?	✓			
Did compound spectra meet specified EPA "Functional Guidelines" criteria?	✓			
Were chromatogram peaks verified and accounted for?	✓			
XII. Compound quantitation/CRQLs				
Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound?	✓			
Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
XIII. Tentatively identified compounds (TICs)				
Were the major ions (> 10 percent relative intensity) in the reference spectrum evaluated in sample spectrum?			✓	
Were relative intensities of the major ions within ± 20% between the sample and the reference spectra?			✓	
Did the raw data indicate that the laboratory performed a library search for all required peaks in the chromatograms (samples and blanks)?		✓		
XIV. System performance				
System performance was found to be acceptable.	✓			
XV. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
XVI. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target compounds were detected in the field duplicates.			✓	
XVII. Field blanks				
Field blanks were identified in this SDG.	✓			
Target compounds were detected in the field blanks.	✓			

VALIDATION FINDINGS WORKSHEET

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

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

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

LDC #: 21495B2a
SDG #: Eaton

VALIDATION FINDINGS WORKSHEET
Technical Holding Times

Page: 1 of 1
Reviewer: JV6
2nd Reviewer:

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

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

Sample ID	Matrix	Preserved	Sampling Date	Extraction date	Analysis date	Total # of Days	Qualifier
2, 4	W	N	5/27/09	6/08/09	6/11/09	11	J-/UJ/A (h)
6	↓	↓	5/28/09	↓	↓	10	↓

TECHNICAL HOLDING TIME CRITERIA

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

LDC #: 21495B2a
SDG #: See Cover
METHOD: GC/MS BNA (EPA SW 846 Method 8270)

VALIDATION FINDINGS WORKSHEET
Initial Calibration

Reviewer: JVG
2nd Reviewer: Q

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

- (Y) N N/A — Did the laboratory conduct an acceptable 5 point calibration prior to sample analysis?
- (Y) N N/A — Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's?
- Y (N) N/A — Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation? N/A
- Y N (N/A) — Did the initial calibration meet the acceptance criteria?
- Y (N) N/A — Were all %RSDs and RRFs within the validation criteria of ≤30 %RSD and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %RSD (Limit: ≤30.0%)	Finding RRF (Limit: ≥0.05)	Associated Samples	Qualifications
	5/22/09	ICAL	UUU		0.048	All + Blks	J/UJ/A (C)

INICAL.2S

LDC #: 21495 B2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: JVG
2nd Reviewer:

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

Y N N/A Were field blanks identified in this SDG?
Y N N/A Were target compounds detected in the field blanks?

Blank units: ug/L **Associated sample units:** ug/L
Sampling date: 5/27/08
Field blank type: (circle one) Field Blank / Rinsate / Other: EB Associated Samples: 1, 2 (ND)

Compound	Blank ID	Sample Identification								
	4									
LL	0.23									
CRQL										

Blank units: ug/L **Associated sample units:** NA
Sampling date: 6/04/08
Field blank type: (circle one) Field Blank / Rinsate / Other: Associated Samples: ~~NA~~ 1, 2, 5, 6 (ND)

Compound	Blank ID	Sample Identification								
	7									
AAA	0.12									
XX	0.78									
LL	0.28									
CRQL										

LDC #: 21495 B2a

SDG #: See Cover

Reviewer: JVG

2nd Reviewer: [illegible]

VALIDATION FINDINGS WORKSHEET
Surrogate Recovery

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

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

Y (N) N/A Were percent recoveries (%R) for surrogates within QC limits?

(Y) N N/A If 2 or more base neutral or acid surrogates were outside QC limits, was a reanalysis performed to confirm %R?

(Y) N N/A If any %R was less than 10 percent, was a reanalysis performed to confirm %R?

#	Date	Sample ID	Surrogate	%R (Limits)	Qualifications
		156625 MB	FBP	32 (45-135)	J-/UJ/P (S)
			NBZ	29 (↓)	↓
			TPH	31 (↓)	↓
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
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				( )	
				( )	
				( )	
				( )	

* QC limits are advisory

	QC Limits (Soil)	QC Limits (Water)
S1 (NBZ) = Nitrobenzene-d5	23-120	35-114
S2 (FBP) = 2-Fluorobiphenyl	30-115	43-116
S3 (TPH) = Terphenyl-d14	18-137	33-141
S4 (PHL) = Phenol-d5	24-113	10-94
S5 (2FP)= 2-Fluorophenol	25-121	21-100
S6 (TBP) = 2,4,6-Tribromophenol	19-122	10-123
S7 (2CP) = 2-Chlorophenol-d4	20-130*	33-110*
S8 (DCB) = 1,2-Dichlorobenzene-d4	20-130*	16-110*

LDC #: 21459B2a
SDG #: See Cover

Reviewer: JVC
2nd Reviewer: [signature]

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

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

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

(Y) N N/A Was a LCS required?

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		156625 LCS/D	RRR	( )	44 (50-120)	( )	1, 3, 5, 156625MB	No qual (LCS in)
			TTT	( )	44 (↓)	( )	↓	↓ ↓
				( )	( )	( )		
				( )	( )	( )		
		157385 LCS/D	RRR	37 (50-120)	27 ( )	32 (30)	2, 4, 6, 7, 157385MB	J/UJ/P (l, ld)
			TTT	43 (↓)	47 (↓)	( )	↓	J-/UJ/P (l)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
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LDC #: 21495B2q
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

Reviewer: JVG
2nd Reviewer: [signature]

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

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

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

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

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		2, 4, 6	Confirmation runs (MB surr outside limits)		X / A (o)

Comments: _____

LDC #: 21495 B2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: [illegible]

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

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

RRF = $(A_x)(C_{is})/(A_{is})(C_x)$
average RRF = sum of the RRFs/number of standards
%RSD = 100 * (S/X)

A_x = Area of compound,
C_x = Concentration of compound,
S = Standard deviation of the RRFs,

A_{is} = Area of associated internal standard
C_{is} = Concentration of internal standard
X = Mean of the RRFs

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Reported RRF (1.0 std)	Recalculated RRF (1.0 std)	Reported Average RRF (initial)	Recalculated Average RRF (initial)	Reported %RSD	Recalculated %RSD
1	ICAL	5/22/09	~~Phenol~~ (1st internal standard) 1,4-Dioxane	0.666	0.666	0.706	0.706	11.0	11.0
			Naphthalene (2nd internal standard)	1.008	1.008	1.079	1.079	10.15	10.17
			Fluorene (3rd internal standard)	1.147	1.147	1.190	1.190	6.07	6.06
			~~Pentachlorophenol~~ (4th internal standard) Phenanthrene	0.993	0.993	0.989	0.989	3.79	3.80
			Bis(2-ethylhexyl)phthalate (5th internal standard)	0.708	0.708	0.743	0.743	3.51	3.51
			Benzo(a)pyrene (6th internal standard)	1.108	1.108	1.194	1.194	8.47	8.47
2			Phenol (1st internal standard)						
			Naphthalene (2nd internal standard)						
			Fluorene (3rd internal standard)						
			Pentachlorophenol (4th internal standard)						
			Bis(2-ethylhexyl)phthalate (5th internal standard)						
			Benzo(a)pyrene (6th internal standard)						
3			Phenol (1st internal standard)						
			Naphthalene (2nd internal standard)						
			Fluorene (3rd internal standard)						
			Pentachlorophenol (4th internal standard)						
			Bis(2-ethylhexyl)phthalate (5th internal standard)						
			Benzo(a)pyrene (6th internal standard)						

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

		4.0	5	10
1,4-D	=	0.6973	0.6613	0.6427
S	=	1.021	1.047	1.028
NN	=	1.193	1.258	1.234
UU	=	1.009	1.013	0.968
EEE	=	0.746	0.759	0.746
III	=	1.254	1.273	1.267

LDC #: 21495B2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

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

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

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

% Difference = 100 * (ave. RRF - RRF)/ave. RRF
$RRF = (A_x)(C_{is})/(A_{is})(C_x)$

Where: ave. RRF = initial calibration average RRF
RRF = continuing calibration RRF
A_x = Area of compound, A_{is} = Area of associated internal standard
C_x = Concentration of compound, C_{is} = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Average RRF (Initial)	Reported RRF (CC)	Recalculated RRF (CC)	Reported %D	Recalculated %D
1	DA456	6/04/09	~~Phenol~~ (1st internal standard) 1,4-Dioxane	0.706	0.708	0.708	0.3	0.3
			Naphthalene (2nd internal standard)	1.079	1.039	1.039	3.7	3.7
			Fluorene (3rd internal standard)	1.190	1.267	1.267	6.5	6.5
			~~Pentachlorophenol~~ (4th internal standard)	0.989	1.048	1.048	6.0	6.0
			Bis(2-ethylhexyl)phthalate (5th internal standard)	0.743	0.748	0.748	0.7	0.7
			Benzo(a)pyrene (6th internal standard)	1.194	1.253	1.253	4.9	4.9
2	DA547	6/11/09	~~Phenol~~ (1st internal standard) 1,4-Dioxane	0.706	0.772	0.772	9.3	9.3
			Naphthalene (2nd internal standard)	1.079	1.044	1.044	3.2	3.2
			Fluorene (3rd internal standard)	~~1.190~~ 1.190	1.230	1.230	3.4	3.4
			~~Pentachlorophenol~~ (4th internal standard)	0.989	0.933	0.933	5.7	5.7
			Bis(2-ethylhexyl)phthalate (5th internal standard)	0.743	0.833	0.833	12.1	12.1
			Benzo(a)pyrene (6th internal standard)	1.194	1.245	1.245	4.3	4.3
3			Phenol (1st internal standard)					
			Naphthalene (2nd internal standard)					
			Fluorene (3rd internal standard)					
			Pentachlorophenol (4th internal standard)					
			Bis(2-ethylhexyl)phthalate (5th internal standard)					
			Benzo(a)pyrene (6th internal standard)					

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

LDC #: 21495B24
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

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

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

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

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: #1

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Nitrobenzene-d5	2.00	1.89	95	95	0
2-Fluorobiphenyl	↓	1.74	87	87	↓
Terphenyl-d14	↓	1.82	91	91	↓
Phenol-d5					
2-Fluorophenol					
2,4,6-Tribromophenol					
2-Chlorophenol-d4					
1,2-Dichlorobenzene-d4					

Sample ID:

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Nitrobenzene-d5					
2-Fluorobiphenyl					
Terphenyl-d14					
Phenol-d5					
2-Fluorophenol					
2,4,6-Tribromophenol					
2-Chlorophenol-d4					
1,2-Dichlorobenzene-d4					

Sample ID:

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Nitrobenzene-d5					
2-Fluorobiphenyl					
Terphenyl-d14					
Phenol-d5					
2-Fluorophenol					
2,4,6-Tribromophenol					
2-Chlorophenol-d4					
1,2-Dichlorobenzene-d4					

LDC #: 21495B29
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET

Laboratory Control Sample/Laboratory Control Sample Duplicates Results Verification

Reviewer: JVL
2nd Reviewer: Q

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

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

% Recovery = 100 * (SC/SA Where: SSC = Spike concentration
SA = Spike added

RPD = I LCS - LCSD I * 2/(LCS + LCSD) LCS = Laboratory control sample percent recovery LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: 88595 LCS/D

Compound	Spike Added ( )		Spike Concentration ( )		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc	Reported	Recalc	Reported	Recalculated
Phenol										
N-Nitroso-di-n-propylamine										
4-Chloro-3-methylphenol										
Acenaphthene	4.00	4.00	3.29	3.27	82	82	82	82	1	1
Pentachlorophenol										
Pyrene	4.00	4.00	3.35	3.55	84	84	89	89	5	6

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

LDC #: 21495 #2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
Reviewer: JTK
2nd reviewer:

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

Y N N/A Were all reported results recalculated and verified for all level IV samples?
Y N N/A Were all recalculated results for detected target compounds agree within 10.0% of the reported results?

Concentration = $\frac{(A_x)(I_s)(V_t)(DF)(2.0)}{(A_{is})(RRF)(V_o)(V_i)(\%S)}$

A_x = Area of the characteristic ion (EICP) for the compound to be measured

A_{is} = Area of the characteristic ion (EICP) for the specific internal standard

I_s = Amount of internal standard added in nanograms (ng)

V_o = Volume or weight of sample extract in milliliters (ml) or grams (g).

V_i = Volume of extract injected in microliters (ul)

V_t = Volume of the concentrated extract in microliters (ul)

Df = Dilution Factor.

%S = Percent solids, applicable to soil and solid matrices only.

2.0 = Factor of 2 to account for GPC cleanup

Example:

Sample I.D. # , 1,4-Dioxane

Conc. = $\frac{(40760)(1)(1\ ml)(1000)(\ )}{(9291)(0.706)(1060ml)(\ )(\ )}$

= 0.59 ug/L

#	Sample ID	Compound	Reported Concentration ( )	Calculated Concentration ( )	Qualification

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 22, 2009

Matrix: Soil

Parameters: Semivolatiles

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903051

Sample Identification

RSA12-0.5B
RSA12-0.5BDL
RSAI3-0.5B
RSAJ5-0.5B
RSAK5-0.5B
RSAK5-0.5BDL
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
RSA12-0.5BMS
RSA12-0.5BMSD
SA189-0.5BMS
SA189-0.5BMSD

Introduction

This data review covers 24 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

This review follows 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 V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.

J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.

J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.

U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.

R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.

UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.

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. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

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

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

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
5/22/09	Octachlorostyrene	0.048 (≥0.05)	All samples in SDG R0903051	J (all detects) UJ (all non-detects)	A

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

All of the continuing calibration RRF values were greater than or equal to 0.05 with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/9/09	Octachlorostyrene	0.047 (≥0.05)	RSA12-0.5BDL RSAI3-0.5B RSAJ5-0.5B RSAK5-0.5BDL SA76-0.5B SA100-0.5B RSA12-0.5BMS RSA12-0.5BMSD 88783MB	J (all detects) UJ (all non-detects)	A
6/10/09	Octachlorostyrene	0.049 (≥0.05)	SA76009-0.5B RSAL3-0.5B SA189-0.5B SA88-0.5B SA152-0.5B SA152009-0.5B RSAJ2-0.5B RSAJ3-0.5B SA202-0.5B SA189-0.5BMS SA189-0.5BMSD	J (all detects) UJ (all non-detects)	A

V. Blanks

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

Method Blank ID	Extraction Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
88783MB	6/4/09	Di-n-butylphthalate	33 ug/Kg	RSA12-0.5B RSA12-0.5BDL RSAI3-0.5B RSAJ5-0.5B RSAK5-0.5B RSAK5-0.5BDL SA76-0.5B SA76009-0.5B RSAL3-0.5B SA100-0.5B RSAM3-0.5B RSAM2-0.5B

Method Blank ID	Extraction Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
88824MB	6/8/09	Di-n-butylphthalate Naphthalene	63 ug/Kg 1.7 ug/Kg	SA189-0.5B SA88-0.5B SA152-0.5B SA152009-0.5B RSAJ2-0.5B RSAJ3-0.5B SA202-0.5B

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

Sample	Compound TIC (RT in minutes)	Reported Concentration	Modified Final Concentration
RSAM3-0.5B	Di-n-butylphthalate	40 ug/Kg	40U ug/Kg
RSAM2-0.5B	Di-n-butylphthalate	69 ug/Kg	69U ug/Kg
SA189-0.5B	Di-n-butylphthalate Naphthalene	120 ug/Kg 1.4 ug/Kg	120U ug/Kg 1.4U ug/Kg
SA152-0.5B	Naphthalene	1.4 ug/Kg	1.4U ug/Kg
SA152009-0.5B	Di-n-butylphthalate	39 ug/Kg	39U ug/Kg
SA202-0.5B	Di-n-butylphthalate Naphthalene	89 ug/Kg 1.4 ug/Kg	89U ug/Kg 1.4U ug/Kg

Sample FB072109-SO (from SDG R0904016) was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072109-SO	7/21/09	Bis(2-ethylhexyl)phthalate Butylbenzylphthalate Di-n-butylphthalate Diethylphthalate	1.4 ug/Kg 0.18 ug/Kg 1.5 ug/Kg 0.35 ug/Kg	All soil samples in SDG R0903051

Sample concentrations were compared to concentrations detected in the field blanks as required by the QAPP. No sample data was qualified.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for several samples. Since these samples were diluted out, no data were qualified.

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All project quantitation limits were within validation criteria with the following exceptions:

Sample	Compound	Finding	Criteria	Flag	A or P
RSA12-0.5B RSAK5-0.5B	Hexachlorobenzene Octachlorostyrene	Sample result exceeded calibration range.	Reported result should be within calibration range.	J (all detects) J (all detects)	A

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.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment

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
RSA12-0.5B RSAK5-0.5B	Hexachlorobenzene Octachlorostyrene	X X	A
RSA12-0.5BDL RSAK5-0.5BDL	All TCL compounds except Hexachlorobenzene Octachlorostyrene	X	A

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

XVI. Field Duplicates

Samples SA76-0.5B and SA76009-0.5B and samples SA152-0.5B and SA152009-0.5B were identified as field duplicates. No semivolatiles 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				
Hexachlorobenzene	17000	13000	27 (≤50)	-	-	-
Octachlorostyrene	5400	7000	26 (≤50)	-	-	-

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA152-0.5B	SA152009-0.5B				
Di-n-butylphthalate	180U	39	-	141 (≤180)	-	-

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA152-0.5B	SA152009-0.5B				
Naphthalene	1.4	6.8U	-	5.4 (≤6.8)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG R0903051

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903051	RSA12-0.5B RSA12-0.5BDL RSAI3-0.5B RSAJ5-0.5B RSAK5-0.5B RSAK5-0.5BDL 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	Octachlorostyrene	J (all detects) UJ (all non-detects)	A	Initial calibration (RRF) (c)
R0903051	RSA12-0.5BDL RSAI3-0.5B RSAJ5-0.5B RSAK5-0.5BDL SA76-0.5B SA76009-0.5B RSAL3-0.5B SA100-0.5B SA189-0.5B SA88-0.5B SA152-0.5B SA152009-0.5B RSAJ2-0.5B RSAJ3-0.5B SA202-0.5B	Octachlorostyrene	J (all detects) UJ (all non-detects)	A	Continuing calibration (RRF) (c)
R0903051	RSA12-0.5B RSAK5-0.5B	Hexachlorobenzene Octachlorostyrene	J (all detects) J (all detects)	A	Project Quantitation Limit (e)

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903051	RSA12-0.5B RSA12-0.5BDL RSAI3-0.5B RSAJ5-0.5B RSAK5-0.5B RSAK5-0.5BDL 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)
R0903051	RSA12-0.5B RSAK5-0.5B	Hexachlorobenzene Octachlorostyrene	X X	A	Overall assessment of data (o)
R0903051	RSA12-0.5BDL RSAK5-0.5BDL	All TCL compounds except Hexachlorobenzene Octachlorostyrene	X	A	Overall assessment of data (o)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Semivolatiles - Laboratory Blank Data Qualification Summary - SDG R0903051

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P	Code
R0903051	RSAM3-0.5B	Di-n-butylphthalate	40U ug/Kg	A	bl
R0903051	RSAM2-0.5B	Di-n-butylphthalate	69U ug/Kg	A	bl
R0903051	SA189-0.5B	Di-n-butylphthalate Naphthalene	120U ug/Kg 1.4U ug/Kg	A	bl
R0903051	SA152-0.5B	Naphthalene	1.4U ug/Kg	A	bl
R0903051	SA152009-0.5B	Di-n-butylphthalate	39U ug/Kg	A	bl
R0903051	SA202-0.5B	Di-n-butylphthalate Naphthalene	89U ug/Kg 1.4U ug/Kg	A	bl

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles- Field Blank Data Qualification Summary - SDG R0903051

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21495C2a
SDG #: R0903051
Laboratory: Columbia Analytical Services

Date: 9/16/09
Page: 1 of 1
Reviewer: JVB
2nd Reviewer: [illegible]

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/01-04/09
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	SW	
IV.	Continuing calibration/ICV	SW	CCV/ICV ≤ 25%
V.	Blanks	SW	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	SW	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	SW	
XVI.	Field duplicates	SW	D_1 = 7, 8 D_2 = 15, 16
XVII.	Field blanks	SW	~~FB = 20~~ FB = FB072109-SO from R0906016

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	RSA12-0.5B	S	11	RSAM3-0.5B	S	21	RSA12-0.5BMS		31	~~157385 MB~~	
2	RSA12-0.5BDL		12	RSAM2-0.5B		22	RSA12-0.5BMSD		32	887883 MB	
3	RSAI3-0.5B		13	SA189-0.5B		23	SA189-0.5BMS		33	88824 MB	
4	RSAJ5-0.5B		14	SA88-0.5B		24	SA189-0.5BMSD		34		
5	RSAK5-0.5B		15	SA152-0.5B	D	25			35		
6	RSAK5-0.5BDL		16	SA152009-0.5B	D	26			36		
7	SA76-0.5B	D	17	RSAJ2-0.5B		27			37		
8	SA76009-0.5B	D	18	RSAJ3-0.5B		28			38		
9	RSAL3-0.5B		19	SA202-0.5B		29			39		
10	SA100-0.5B		~~20~~	~~FB060409~~	W	30			40		

(#20-reported on R0903006) (no r)

VALIDATION FINDINGS WORKSHEET

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

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

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

LDC #: 21495 C2a
SDG #: See Cover
METHOD: GC/MS BNA (EPA SW 846 Method 8270C)

VALIDATION FINDINGS WORKSHEET
Initial Calibration

Reviewer: JVG
2nd Reviewer: [illegible]

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

- (Y) N N/A — Did the laboratory conduct an acceptable 5 point calibration prior to sample analysis?
- (Y) N N/A — Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's?
- Y (N) N/A — Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation? NA
- Y N (N/A) — Did the initial calibration meet the acceptance criteria?
- Y (N) N/A — Were all %RSDs and RRFs within the validation criteria of ≤30 %RSD and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %RSD (Limit: ≤30.0%)	Finding RRF (Limit: ≥0.05)	Associated Samples	Qualifications
	5/22/09	ICAL	UUU		0.048	All + Blks	J/UJ/A (c)

INICAL.2S

LDC #: 21495 C29
SDG #: Su Cmw

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Reviewer: JVG
2nd Reviewer: [signature]

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

(Y) N N/A Was a continuing calibration standard analyzed at least once every 12 hours of sample analysis for each instrument?
Y N N/A Were percent differences (%D) and relative response factors (RRF) within method criteria for all CCC's and SPCC's ?
Y (N) N/A Were all %D and RRFs within the validation criteria of ≤25 %D and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %D (Limit: <25.0%)	Finding RRF (Limit: >0.05)	Associated Samples	Qualifications
	6/09/09	DA 502 (CCV)	ALL		0.047	2-4, 6, 7, 10, 21, 22 88783 MB	J/NJ/A (C)
	6/10/09	DA 526 (CCV)	ALL		0.049	8, 9, 13-19, 23, 24	J/NJ/A (C)

CONCAL.2S

LDC #: 21495 C2a
SDG #: Fy Cmv

VALIDATION FINDINGS WORKSHEET
Blanks

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

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

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

Y N N/A Was a method blank analyzed for each matrix?
Y N N/A Was a method blank analyzed for each concentration preparation level?
Y N N/A Was a method blank associated with every sample?
Y N N/A Was the blank contaminated? If yes, please see qualification below.

Blank extraction date: 6/04/09 **Blank analysis date:** 6/08/09 Associated Samples: 1-12 (6 L)
Conc. units: ug/kg

Compound	Blank ID	Sample Identification								
	88783 MB	11	12							
165 XX	33	40/U	69/U							

Blank extraction date: 6/08/09 **Blank analysis date:** 6/09/09 Associated Samples: 13 – 19 (6 L)
Conc. units: ug/kg

Compound	Blank ID	Sample Identification								
	88824 MB	13	15	16	18 (2x)	19				
3.15 XX	63	120/U		39/U		89/U				
3.4 S	1.7	1.4/U	1.4/U		7.6 Y	1.4/U				

5x Phthalates
2x all others

LDC #: 21495 C2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: JVG
2nd Reviewer: [signature]

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

Y N N/A Were field blanks identified in this SDG?
Y N N/A Were target compounds detected in the field blanks?

Blank units: ug/L **Associated sample units:** NA
Sampling date: 6/04/09
Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: None

Compound	Blank ID	Sample Identification								
	20									
AAA	0.12									
XX	0.78									
LL	0.28									
CRQL										

Blank units: ug/L **Associated sample units:** ug/kg
Sampling date: 7/21/09
Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: All soils

Compound	FB072109-SO Blank ID	Sample Identification								
	7/21/09									
EEE	1.4		(All Results either ND or > MB)							
AAA	0.18									
XX	1.5									
LL	0.35									
CRQL										

7.0
0.9
7.5
1.75

5x Phthalates
2x all others

LDC #: 21495C 2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Recovery

Reviewer: JV6
2nd Reviewer: [illegible]

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

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

(Y) N N/A Were percent recoveries (%R) for surrogates within QC limits?
(Y) N N/A If 2 or more base neutral or acid surrogates were outside QC limits, was a reanalysis performed to confirm %R?
(Y) N N/A If any %R was less than 10 percent, was a reanalysis performed to confirm %R?

#	Date	Sample ID	Surrogate	%R (Limits)	Qualifications
		2 (600X)	FBP	0 (45-135)	No qual
		3 (60X)	NBZ	( )	
		4 (20X)	TPH	( )	
		6 (30X)		( )	
		7 (100X)		( )	
		8 (100X)		( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

* QC limits are advisory	QC Limits (Soil)	QC Limits (Water)
S1 (NBZ) = Nitrobenzene-d5	23-120	35-114
S2 (FBP) = 2-Fluorobiphenyl	30-115	43-116
S3 (TPH) = Terphenyl-d14	18-137	33-141
S4 (PHL) = Phenol-d5	24-113	10-94
S5 (2FP)= 2-Fluorophenol	25-121	21-100
S6 (TBP) = 2,4,6-Tribromophenol	19-122	10-123
S7 (2CP) = 2-Chlorophenol-d4	20-130*	33-110*
S8 (DCB) = 1,2-Dichlorobenzene-d4	20-130*	16-110*

LDC #: 21495 C2a
SDG #: Cu Creek

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

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

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

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

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

(Y) N N/A Was a MS/MSD analyzed every 20 samples of each matrix?

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		21/22	DDD	225 (10-182)	220 (10-187)	( )	1	No qual (LCS/D in)
			XX	( )	( )	32 (30)	↓	↓
			YY	225 (11-188)	215 (11-188)	( )		
			SS	0 (50-150)	0 (50-150)	( )		
			ZZ	213 (10-194)	200 (10-194)	( )		
			RRR	( )	30 (50-150)	55 (30)		
			UUU	9995 (50-150)	8425 (50-150)	( )	✓	✓
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

	Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)		Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)
A.	Phenol	26-90%	≤ 35%	12-110%	≤ 42%	GG	Acenaphthene	31-137%	≤ 19%	46-118%	≤ 31%
C.	2-Chlorophenol	25-102%	≤ 50%	27-123%	≤ 40%	II.	4-Nitrophenol	11-114%	≤ 50%	10-80%	≤ 50%
E.	1,4-Dichlorobenzene	28-104%	≤ 27%	36-97%	≤ 28%	KK.	2,4-Dinitrotoluene	28-89%	≤ 47%	24-96%	≤ 38%
J.	N-Nitroso-di-n-propylamine	41-126%	≤ 38%	41-116%	≤ 38%	TT.	Pentachlorophenol	17-109%	≤ 47%	9-103%	≤ 50%
R.	1,2,4-Trichlorobenzene	38-107%	≤ 23%	39-98%	≤ 28%	ZZ.	Pyrene	35-142%	≤ 36%	26-127%	≤ 31%
V.	4-Chloro-3-methylphenol	26-103%	≤ 33%	23-97%	≤ 42%						

LDC #: 21495 C2a
SDG #: Sa Cory

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

Reviewer: JVG
2nd Reviewer: Q

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

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

(Y) N N/A — Was a LCS required?

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		157385 LCS/D	RRR	37 (50-120)	27 (50-120)	32 (30)	20, 157385 MB	J/UJ/P (l ld)
			TTT	43 (↓)	47 (↓)	( )	↓	J/UJ/P (l)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
		88824 LCS/D	XX	124 (50-120)	( )	( )	13-19, 88824 MB	No qual (LCSD in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC #: 21495C2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

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

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

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

Y N N/A Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound?
Y N N/A Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		1, 5	SS, uuu > cal range		J detects/A (e)

Comments: See sample calculation verification worksheet for recalculations

LDC #: 21495 C2q
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

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

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

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

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

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

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		1, 5	SS, UUU 7 Cal	range	X/A (o)
		2, 6	All except SS, UUU	dil	

Comments: _____

OVR.2S

LDC #: 21495C2q
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

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

Y N N/A Were field duplicate pairs identified in this SDG?
Y N N/A Were target compounds identified in the field duplicate pairs?

Compound	Concentration (ug/kg)		RPD
	7	8	
SS	17000	13000	27 (≤ 50% RPD)
NNN	5400	7000	26

Compound	Concentration (ug/kg)		RPD
	15	16	
XX	180 U	39	141 (≤ 180 Diff)
S	1.4	6.8 U	5.4 (≤ 6.8 Diff)

Compound	Concentration ( )		RPD

Compound	Concentration ( )		RPD

XX – U at MDL not RL (34 U)
S – 0.85 U at MDL not RL

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 9 through June 16, 2009

LDC Report Date: September 23, 2009

Matrix: Water

Parameters: Semivolatiles

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903243

Sample Identification

H-28AB
AW-BW-02B
M-142B
M-130B
M-29B

Introduction

This data review covers 5 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

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 V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.

J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.

J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.

U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.

R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.

UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.

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. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

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

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

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
5/22/09	Octachlorostyrene	0.048 (≥0.05)	All samples in SDG R0903243	J (all detects) UJ (all non-detects)	A

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

All of the continuing calibration RRF values were greater than or equal to 0.05 .

V. Blanks

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

Method Blank ID	Extraction Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
89594MB	6/17/09	Butylbenzylphthalate Di-n-butylphthalate	0.18 ug/L 1.2 ug/L	M-142B M-130B

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

Sample FB060409 (from SDG R0903006) was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB060409	6/4/09	Butylbenzylphthalate Di-n-butylphthalate Diethylphthalate	0.12 ug/L 0.78 ug/L 0.28 ug/L	H-28AB AW-BW-02B M-142B M-130B

Sample concentrations were compared to concentrations detected in the field blanks as required by the QAPP. No sample data was qualified.

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

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.

VIII. Laboratory Control Samples (LCS)

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

LCS ID (Associated Samples)	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
89594LCS/D (M-142B M-130B 89594MB)	Pyridine	35 (50-120)	39 (50-120)	-	J- (all detects) UJ (all non-detects)	P
89818LCS/D (M-29B 89818MB)	Pyridine	16 (50-120)	33 (50-120)	67 (≤30)	J (all detects) UJ (all non-detects)	P

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903243	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment

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

XVI. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG R0903243

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903243	H-28AB AW-BW-02B M-142B M-130B M-29B	Octachlorostyrene	J (all detects) UJ (all non-detects)	A	Initial calibration (RRF) (c)
R0903243	M-142B M-130B	Pyridine	J- (all detects) UJ (all non-detects)	P	Laboratory control samples (%R) (l)
R0903243	M-29B	Pyridine	J (all detects) UJ (all non-detects)	P	Laboratory control samples (%R)(RPD) (l,ld)
R0903243	H-28AB AW-BW-02B M-142B M-130B M-29B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG R0903243

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles- Field Blank Data Qualification Summary - SDG R0903243

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21495D2a
SDG #: R0903243
Laboratory: Columbia Analytical Services

Date: 9/17/09
Page: 1 of 1
Reviewer: SV
2nd Reviewer: [signature]

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/09 - 16/09
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	SW	
IV.	Continuing calibration/ICV	~~SW~~ A	CCV/ICV ≤ 25 %
V.	Blanks	SW	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	N	client spec
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	N	
XVII.	Field blanks	SW	FB = FB060409 from R0903006

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

Validated Samples: Water

1	H-28AB	11	89336 MB	21		31	
2	AW-BW-02B	12	89594 MB	22		32	
3	M-142B	13	89818 MB	23		33	
4	M-130B	14		24		34	
5	M-29B	15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

(no r2)

VALIDATION FINDINGS WORKSHEET

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

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

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

LDC #: 21495 D2a
SDG #: See Cover
METHOD: GC/MS BNA (EPA SW 846 Method 8270)

VALIDATION FINDINGS WORKSHEET
Initial Calibration

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

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

- (Y) N N/A — Did the laboratory conduct an acceptable 5 point calibration prior to sample analysis?
- (Y) N N/A — Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's?
- Y (N) N/A — Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation? NA
- Y N (N/A) — Did the initial calibration meet the acceptance criteria?
- Y (N) N/A — Were all %RSDs and RRFs within the validation criteria of ≤30 %RSD and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %RSD (Limit: ≤30.0%)	Finding RRF (Limit: ≥0.05)	Associated Samples	Qualifications
	5/22/09	ICAL	UUU		0.048	All + Blks	J/UJ/A (c)

INICAL.2S

LDC #: 21495D2q
SDG #: Su Cmar

VALIDATION FINDINGS WORKSHEET
Blanks

Reviewer: OVG
2nd Reviewer: Q

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

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

Y N N/A Was a method blank analyzed for each matrix?
Y N N/A Was a method blank analyzed for each concentration preparation level?
Y N N/A Was a method blank associated with every sample?
Y N N/A Was the blank contaminated? If yes, please see qualification below.

Blank extraction date: 6/17/09 **Blank analysis date:** 6/17/09
Conc. units: ug/L Associated Samples: 3, 4 (ND)

Compound	Blank ID	Sample Identification								
	89594 MB									
AAA	0.18									
XX	1.2									

Blank extraction date: _____ **Blank analysis date:** _____
Conc. units: _____ Associated Samples: _____

Compound	Blank ID	Sample Identification								

5x Phthalates
2x all others

LDC #: 21495 D2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Page: 1 of 1
Reviewer: JVE
2nd Reviewer:

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

Y N N/A Were field blanks identified in this SDG?
Y N N/A Were target compounds detected in the field blanks?

Blank units: ug/L **Associated sample units:** ug/L
Sampling date: 6/04/09
Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: 1-4 (ND)

Compound	Blank ID	Sample Identification								
	FB060409									
(5x) 0.6 AAA	0.12									
3.9 XX	0.78									
1.4 LL	0.28									
CRQL										

Blank units: _____ **Associated sample units:** _____
Sampling date: _____
Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: _____

Compound	Blank ID	Sample Identification								
CRQL										

5x Phthalates
2x all others

LDC #: 21495D2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

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

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

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

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		89336 LCS/D	RRR	( )	27 (50-120)	66 (30)	1, 2, 89336 MB	No qual (LCS only)
			TTT	48 (50-120)	( )	( )	↓	↓ (LCSD in)
				( )	( )	( )		
				( )	( )	( )		
		89594 LCS/D	RRR	35 (50-120)	39 (50-120)	( )	3, 4, 89594 MB	J-/UJ/P (l)
				( )	( )	( )		
				( )	( )	( )		
		89818 LCS/D	RRR	16 (50-120)	33 (50-120)	67 (30)	5, 89818 MB	J/UJ/P (l, d)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 17 through June 24, 2009

LDC Report Date: September 23, 2009

Matrix: Water

Parameters: Semivolatiles

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903404

Sample Identification

M-78B
M-78BRE
M-128B
H-38B
M-19B
M-34B
M-125B
M-22AB
M-17AB
M-125BMS
M-125BMSD

Introduction

This data review covers 11 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

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 V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.

J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.

J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.

U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.

R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.

UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.

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. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

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

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

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

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
5/22/09	Octachlorostyrene	0.048 (≥0.05)	M-78B M-78BRE M-128B H-38B M-19B M-34B M-125B M-125BMS M-125BMSD 89818MB 90162MB	J (all detects) UJ (all non-detects)	A

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

All of the continuing calibration RRF values were greater than or equal to 0.05 with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/24/09	Octachlorostyrene	0.044 (≥0.05)	M-78BRE H-38B M-19B M-34B	J (all detects) UJ (all non-detects)	A
6/26/09	Octachlorostyrene	0.049 (≥0.05)	M-125B M-125BMS M-125BMSD 90162MB	J (all detects) UJ (all non-detects)	A

V. Blanks

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

Method Blank ID	Extraction Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
90162MB	6/25/09	Di-n-butylphthalate	0.98 ug/L	M-125B

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

Sample FB060409 (from SDG R0903006) was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB060409	6/4/09	Butylbenzylphthalate Di-n-butylphthalate Diethylphthalate	0.12 ug/L 0.78 ug/L 0.28 ug/L	M-78B M-78BRE M-128B H-38B M-125B

Sample concentrations were compared to concentrations detected in the field blanks as required by the QAPP. No sample data was qualified.

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

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

Spike ID (Associated Samples)	Compound	MS (%R) (Limits)	MSD (%R) (Limits)	RPD (Limits)	Flag	A or P
M-125BMS/MSD (M-125B)	Pyridine	36 (50-150)	21 (50-150)	53 (≤30)	J (all detects) UJ (all non-detects)	A

VIII. Laboratory Control Samples (LCS)

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

LCS ID (Associated Samples)	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
89818LCS/D (M-78B M-78BRE M-128B H-38B M-19B M-34B 89818MB)	Pyridine	16 (50-120)	33 (50-120)	67 (≤30)	J (all detects) UJ (all non-detects)	P

LCS ID (Associated Samples)	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
90162LCS/D (M-125B 90162MB)	Pyridine	34 (50-120)	27 (50-120)	-	J- (all detects) UJ (all non-detects)	P

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

Sample	Internal Standards	Area (Limits)	Compound	Flag	A or P
M-78B	Perylene-d12	438 (101972-407888)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A
M-78BRE	Perylene-d12	969 (127882-511528)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A
M-125B	Perylene-d12	121582 (127216-508862)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	A

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903404	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment

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

Sample	Compound	Flag	A or P
M-78BRE	All TCL compounds	X	A

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

XVI. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG R0903404

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903404	M-78B M-78BRE M-128B H-38B M-19B M-34B M-125B	Octachlorostyrene	J (all detects) UJ (all non-detects)	A	Initial calibration (RRF) (c)
R0903404	M-78BRE H-38B M-19B M-34B M-125B	Octachlorostyrene	J (all detects) UJ (all non-detects)	A	Continuing calibration (RRF) (c)
R0903404	M-125B	Pyridine	J (all detects) UJ (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R)(RPD) (m,ld)
R0903404	M-78B M-78BRE M-128B H-38B M-19B M-34B	Pyridine	J (all detects) UJ (all non-detects)	P	Laboratory control samples (%R)(RPD) (l,ld)
R0903404	M-125B	Pyridine	J- (all detects) UJ (all non-detects)	P	Laboratory control samples (%R) (l)
R0903404	M-78B M-78BRE	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A	Internal standards (area) (i)
R0903404	M-125B	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	A	Internal standards (area) (i)

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903404	M-78B M-78BRE M-128B H-38B M-19B M-34B M-125B M-22AB M-17AB	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
R0903404	M-78BRE	All TCL compounds	X	A	Overall assessment of data (o)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG R0903404

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles- Field Blank Data Qualification Summary - SDG R0903404

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21495E2a
SDG #: R0903404
Laboratory: Columbia Analytical Services

Date: 9/17/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/17 - 24/09
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	SW	%RSD r²
IV.	Continuing calibration/ICV	SW	CCV/ICV ≤ 25%
V.	Blanks	SW	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	SW	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	SW	
XVI.	Field duplicates	N	
XVII.	Field blanks	SW	FB = FB060409 from R0903056

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

Validated Samples: Water

1	M-78B	11	M-125BMSD	21	89818 MB	31	
2	M-78BRE	12		22	90162 MB	32	
3	M-128B	13		23	90344 MB	33	
4	H-38B	14		24		34	
5	M-19B	15		25		35	
6	M-34B	16		26		36	
7	M-125B	17		27		37	
8	M-22AB	18		28		38	
9	M-17AB	19		29		39	
10	M-125BMS	20		30		40	

(no r²)

VALIDATION FINDINGS WORKSHEET

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

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

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

LDC #: [illegible]
SDG #: [illegible]

VALIDATION FINDINGS WORKSHEET
Initial Calibration

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

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

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

(Y) N N/A Did the laboratory conduct an acceptable 5 point calibration prior to sample analysis?
(Y) N N/A Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's?
(Y) (N) N/A Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation? * NA
Y N (N/A) Did the initial calibration meet the acceptance criteria?
Y (N) N/A Were all %RSDs and RRFs within the validation criteria of ≤30 %RSD and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %RSD (Limit: ≤30.0%)	Finding RRF (Limit: ≥0.05)	Associated Samples	Qualifications
	5/22/09	ICAL	UUU		0.048	1-7, 10, 11, 89818MB, 90162MB	J/UJ/A Cc
(Linear Reg)	~~7/01/09~~	~~ICAL~~	~~UUU~~		~~0.049~~	~~8, 9, 90344 MB~~	

INICAL.2S

LDC #: 21495E2a

SDG #: Sa Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

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

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

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

Y N N/A Was a continuing calibration standard analyzed at least once every 12 hours of sample analysis for each instrument?

Y N N/A Were percent differences (%D) and relative response factors (RRF) within method criteria for all CCC's and SPCC's ?

Y N N/A Were all %D and RRFs within the validation criteria of ≤25 %D and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %D (Limit: <25.0%)	Finding RRF (Limit: >0.05)	Associated Samples	Qualifications
	6/24/09	DA682	UUU		0.044	2,4-6,	J/UJ/A (c)
	6/29/09	DA733	UUU		0.049	7, 10, 11, 90162MB	
	~~6 7/07/09~~	~~DA802~~	~~UUU~~		~~0.043~~	~~8, 9~~	

CONCAL.2S

LDC #: 21495E2a
SDG #: Eq Cover

VALIDATION FINDINGS WORKSHEET
Blanks

Page: 1 of 1
Reviewer: SVG
2nd Reviewer: 9

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

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

Y N N/A Was a method blank analyzed for each matrix?
Y N N/A Was a method blank analyzed for each concentration preparation level?
Y N N/A Was a method blank associated with every sample?
Y N N/A Was the blank contaminated? If yes, please see qualification below.

Blank extraction date: 6/25/09 **Blank analysis date:** 6/26/09
Conc. units: ug/L Associated Samples: 7 (ND)

Compound	Blank ID	Sample Identification								
	90162 MB									
XX	0.98									

Blank extraction date: _____ **Blank analysis date:** _____
Conc. units: _____ Associated Samples: _____

Compound	Blank ID	Sample Identification								

5x Phthalates
2x all others

LDC #: 21495E2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

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

Y N N/A Were field blanks identified in this SDG?
Y N N/A Were target compounds detected in the field blanks?

Blank units: ug/L **Associated sample units:** ug/L
Sampling date: 6/04/09
Field blank type: (circle one) Field Blank / Rinsate / Other:_____ Associated Samples: 1-4, 7 (ND)

Compound	Blank ID	Sample Identification								
	FB060409									
(5x) 0.6 AAA	0.12									
3.9 XX	0.78									
1.4 LL	0.28									
CRQL										

Blank units:_____ **Associated sample units:**_____
Sampling date:_____
Field blank type: (circle one) Field Blank / Rinsate / Other:_____ Associated Samples:_____

Compound	Blank ID	Sample Identification								
CRQL										

5x Phthalates
2x all others

LDC #: 21495 E29
SDG #: Sv Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: 9

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

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

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

Y N N/A Was a MS/MSD analyzed every 20 samples of each matrix?

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		10/11	DD	13 (27-143)	26 (27-143)	66 (30)	7	No qual (LCS/D ↓)
			JJJ	0 (24-113)	3 (24-113)	200 ( )	↓	
			L	164 (50-150)	159 (50-150)	( )		
			RRR	36 (↓)	21 (↓)	53 (↓)	↓	J / UJ / A (m, ld)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

	Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)		Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)
A.	Phenol	26-90%	≤ 35%	12-110%	≤ 42%	GG	Acenaphthene	31-137%	≤ 19%	46-118%	≤ 31%
C.	2-Chlorophenol	25-102%	< 50%	27-123%	< 40%	II.	4-Nitrophenol	11-114%	< 50%	10-80%	< 50%
E.	1,4-Dichlorobenzene	28-104%	< 27%	36-97%	< 28%	KK.	2,4-Dinitrotoluene	28-89%	< 47%	24-96%	< 38%
J.	N-Nitroso-di-n-propylamine	41-126%	< 38%	41-116%	< 38%	TT.	Pentachlorophenol	17-109%	< 47%	9-103%	< 50%
R.	1,2,4-Trichlorobenzene	38-107%	< 23%	39-98%	< 28%	ZZ.	Pyrene	35-142%	< 36%	26-127%	< 31%
V.	4-Chloro-3-methylphenol	26-103%	< 33%	23-97%	< 42%						

LDC #: 21495E2a
SDG #: Sa Cur

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

Reviewer: JVG
2nd Reviewer: Q

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

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

(Y) N N/A — Was a LCS required?

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		89818 LCS/D	RRR	16 (50-120)	33 (50-120)	67 (30)	1-6, 89818 MB	J det/UJ/P (l, ld)
		90162 LCS/D	RRR	34 (50-120)	27 (50-120)	( )	7, 90162 MB	J-/UJ/P (l)
			TTT	48 (↓)	( )	( )	↓	No qual (LCSD m)

LDC #: 21495E2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Internal Standards

Page: 1 of 1
Reviewer: NV
2nd Reviewer: 9

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

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

Y N N/A Were all internal standard area counts within -50 to +100 of the associated calibration standard?

Y N N/A Were the retention times of the internal standards within +/- 30 seconds of the retention times of the associated calibration standard?

#	Date	Sample ID	Internal Standard	Area (Limits)	RT (Limits)	Qualifications
		1	PRY	438 (101972 - 407888)		J/R/A (i)
		2	PRY	969 (127882 - 511528)		
		7	PRY	121582 (127216 - 508862)		J/UJ/A
		10		114141		No qual (QC)
		11		126064		
						(qual FFF, GGG, HHH, III, JJJ, KKK, LLL)

* QC limits are advisory

IS1 (DCB) = 1,4-Dichlorobenzene-d4
IS2 (NPT) = Naphthalene-d8
IS3 (ANT) = Acenaphthene-d10
IS4 (PHN) = Phenanthrene-d10
IS5 (CRY) = Chrysene-d12
IS6 (PRY) = Perylene-d12

LDC #: 21495F 2a
SDG #: Su Conv

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

Reviewer: JV6
2nd Reviewer: [illegible]

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

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

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

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

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		2	confirmation for #1		X/A (o)
			(IS outside limits		

Comments: _____

OVR.2S

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: Semivolatiles

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903184

Sample Identification

SA127-0.5B
SA127-0.5BDL
RSAJ6-0.5B
RSAJ6-0.5BDL
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
SA182-0.5BDL
SA201-0.5B
SA201-0.5BDL
SA166-0.5B
RSAK4-0.5B
RSAK4009-0.5B
SA134-0.5B
SA127-0.5BMS
SA127-0.5BMSD
SA55-0.5BMS
SA55-0.5BMSD
SA201-0.5BMS
SA201-0.5BMSD

Introduction

This data review covers 27 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

This review follows 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 V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.

J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.

J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.

U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.

R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.

UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.

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. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

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

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

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
5/22/09	Octachlorostyrene	0.048 (≥0.05)	All samples in SDG R0903184	J (all detects) UJ (all non-detects)	A

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

All of the continuing calibration RRF values were greater than or equal to 0.05 with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/16/09	Octachlorostyrene	0.047 (≥0.05)	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 SA55-0.5BMS SA55-0.5BMSD 89404MB	J (all detects) UJ (all non-detects)	A

V. Blanks

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

Method Blank ID	Extraction Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
89048MB	6/9/09	Butylbenzylphthalate Di-n-butylphthalate Naphthalene	5.7 ug/Kg 43 ug/Kg 1.3 ug/Kg	SA127-0.5B SA127-0.5BDL RSAJ6-0.5B RSAJ6-0.5BDL RSAK6-0.5B RSAK8-0.5B RSAL7-0.5B RSAL8-0.5B
89404MB	6/15/09	Naphthalene	1.3 ug/Kg	SA182-0.5B SA182-0.5BDL SA201-0.5B SA201-0.5BDL SA166-0.5B RSAK4-0.5B RSAK4009-0.5B SA134-0.5B

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

Sample	Compound TIC (RT in minutes)	Reported Concentration	Modified Final Concentration
SA127-0.5B	Di-n-butylphthalate Naphthalene	96 ug/Kg 1.4 ug/Kg	96U ug/Kg 1.4U ug/Kg
RSAK6-0.5B	Di-n-butylphthalate	76 ug/Kg	76U ug/Kg
RSAL7-0.5B	Di-n-butylphthalate Naphthalene	96 ug/Kg 1.0 ug/Kg	96U ug/Kg 1.0U ug/Kg
RSAL8-0.5B	Di-n-butylphthalate	69 ug/Kg	69U ug/Kg
SA182-0.5BDL (70X)	Naphthalene	170 ug/Kg	170U ug/Kg
SA201-0.5B	Naphthalene	2.1 ug/Kg	2.1U ug/Kg
SA166-0.5B	Naphthalene	1.0 ug/Kg	1.0U ug/Kg
RSAK4-0.5B	Naphthalene	1.0 ug/Kg	1.0U ug/Kg

Sample FB072109-SO (from SDG R0904016) was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072109-SO	7/21/09	Bis(2-ethylhexyl)phthalate Butylbenzylphthalate Di-n-butylphthalate Diethylphthalate	1.4 ug/Kg 0.18 ug/Kg 1.5 ug/Kg 0.35 ug/Kg	All samples in SDG R0903184

Sample concentrations were compared to concentrations detected in the field blanks as required by the QAPP. No sample data was qualified.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for several samples. Since these samples were diluted out, no data were qualified.

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All project quantitation limits were within validation criteria with the following exceptions:

Sample	Compound	Finding	Criteria	Flag	A or P
SA127-0.5B	Hexachlorobenzene	Sample result exceeded calibration range.	Reported result should be within calibration range.	J (all detects)	A
SA182-0.5B SA201-0.5B RSAJ6-0.5B	Hexachlorobenzene Octachlorostyrene	Sample result exceeded calibration range.	Reported result should be within calibration range.	J (all detects) J (all detects)	A

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.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment

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
SA127-0.5B	Hexachlorobenzene	X	A
SA127-0.5BDL	All TCL compounds except Hexachlorobenzene	X	A
SA182-0.5B SA201-0.5B RSAJ6-0.5B	Hexachlorobenzene Octachlorostyrene	X X	A
SA182-0.5BDL SA201-0.5BDL RSAJ6-0.5BDL	All TCL compounds except Hexachlorobenzene Octachlorostyrene	X	A

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

XVI. Field Duplicates

Samples RSAK4-0.5B and RSAK4009-0.5B were identified as field duplicates. No semivolatiles were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	RSAK4-0.5B	RSAK4009-0.5B				
Chrysene	4.1	3.8	-	0.3 (≤6.8)	-	-
Fluoranthene	3.8	3.1	-	0.7 (≤6.8)	-	-
Hexachlorobenzene	250	240	4 (≤50)	-	-	-
Naphthalene	1.0	6.8U	-	5.8 (≤6.8)	-	-
Phenanthrene	3.8	3.8	-	0 (≤6.8)	-	-

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	RSAK4-0.5B	RSAK4009-0.5B				
Pyrene	2.7	2.7	-	0 (≤6.8)	-	-
Octachlorostyrene	50	47	6 (≤50)	-	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG R0903184

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903184	SA127-0.5B SA127-0.5BDL RSAJ6-0.5B RSAJ6-0.5BDL 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 SA182-0.5BDL SA201-0.5B SA201-0.5BDL SA166-0.5B RSAK4-0.5B RSAK4009-0.5B SA134-0.5B	Octachlorostyrene	J (all detects) UJ (all non-detects)	A	Initial calibration (RRF) (c)
R0903184	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	Octachlorostyrene	J (all detects) UJ (all non-detects)	A	Continuing calibration (RRF) (c)
R0903184	SA127-0.5B RSAJ6-0.5B	Hexachlorobenzene	J (all detects)	A	Project Quantitation Limit (e)
R0903184	SA182-0.5B SA201-0.5B	Hexachlorobenzene Octachlorostyrene	J (all detects) J (all detects)	A	Project Quantitation Limit (e)

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903184	SA127-0.5B SA127-0.5BDL RSAJ6-0.5B RSAJ6-0.5BDL 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 SA182-0.5BDL SA201-0.5B SA201-0.5BDL 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)
R0903184	SA127-0.5B	Hexachlorobenzene	X	A	Overall assessment of data (o)
R0903184	SA127-0.5BDL	All TCL compounds except Hexachlorobenzene	X	A	Overall assessment of data (o)
R0903184	SA182-0.5B SA201-0.5B RSAJ6-0.5B	Hexachlorobenzene Octachlorostyrene	X X	A	Overall assessment of data (o)
R0903184	SA182-0.5BDL SA201-0.5BDL RSAJ6-0.5BDL	All TCL compounds except Hexachlorobenzene Octachlorostyrene	X	A	Overall assessment of data (o)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG R0903184

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P	Code
R0903184	SA127-0.5B	Di-n-butylphthalate Naphthalene	96U ug/Kg 1.4U ug/Kg	A	bl
R0903184	RSAK6-0.5B	Di-n-butylphthalate	76U ug/Kg	A	bl
R0903184	RSAL7-0.5B	Di-n-butylphthalate Naphthalene	96U ug/Kg 1.0U ug/Kg	A	bl
R0903184	RSAL8-0.5B	Di-n-butylphthalate	69U ug/Kg	A	bl

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P	Code
R0903184	SA182-0.5BDL (70X)	Naphthalene	170U ug/Kg	A	bl
R0903184	SA201-0.5B	Naphthalene	2.1U ug/Kg	A	bl
R0903184	SA166-0.5B	Naphthalene	1.0U ug/Kg	A	bl
R0903184	RSAK4-0.5B	Naphthalene	1.0U ug/Kg	A	bl

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles- Field Blank Data Qualification Summary - SDG R0903184

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21495F2a
SDG #: R0903184
Laboratory: Columbia Analytical Services

Date: 9/17/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer: Q

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/05-11/09
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	SW	
IV.	Continuing calibration/ICV	SW	CCV/ICV ≤ 25%
V.	Blanks	SW	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	SW	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	SW	
XVI.	Field duplicates	SW	D = 19, 20
XVII.	Field blanks	SW	FB ~~FB~~ 72109 -SO from R0904016

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

Validated Samples: Soil

1 1	SA127-0.5B	11 2	SA56-0.5B	21 3	SA134-0.5B	31 1 +	89048 MB
2 1	SA127-0.5BDL	12 2	SA176-0.5B	22 1	SA127-0.5BMS	32 2 −	89341
3 1	RSAJ6-0.5B	13 2	RSA03-0.5B	23 1	SA127-0.5BMSD	33 3 +	89404
4 1	RSAJ6-0.5BDL	14 3	SA182-0.5B	24 2	SA55-0.5BMS	34	
5 1	RSAK6-0.5B	15 3	SA182-0.5BDL	25 2	SA55-0.5BMSD	35	
6 1	RSAK8-0.5B	16 3	SA201-0.5B	26 3	SA201-0.5BMS	36	
7 1	RSAL7-0.5B	17 3	SA201-0.5BDL	27 3	SA201-0.5BMSD	37	
8 1	RSAL8-0.5B	18 3	SA166-0.5B	28		38	
9 2	SA35-0.5B	19 3	RSAK4-0.5B D	29		39	
10 2	SA55-0.5B	20 3	RSAK4009-0.5B D	30		40	

(no r²) (# 13 = RSA03) ↳ letter not #

VALIDATION FINDINGS WORKSHEET

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

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

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

COMPNDL

LDC #: 21495 F2a
SDG #: Eu Cmpy

VALIDATION FINDINGS WORKSHEET
Initial Calibration

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

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

Y N N/A Did the laboratory conduct an acceptable 5 point calibration prior to sample analysis?
Y N N/A Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's?
Y N N/A Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation? NA
Y N N/A Did the initial calibration meet the acceptance criteria?
Y N N/A Were all %RSDs and RRFs within the validation criteria of ≤30 %RSD and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %RSD (Limit: ≤30.0%)	Finding RRF (Limit: ≥0.05)	Associated Samples	Qualifications
	5/22/09	ICAL	ALL		0.048	All + BKS	J/UJ/A (c)

INICAL_2S

LDC #: 21495F2a
SDG #: Cu Conv

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

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

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

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

(Y) N N/A Was a continuing calibration standard analyzed at least once every 12 hours of sample analysis for each instrument?
(Y) N N/A Were percent differences (%D) and relative response factors (RRF) within method criteria for all CCC's and SPCC's ?
Y (N) N/A Were all %D and RRFs within the validation criteria of ≤25 %D and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %D (Limit: <25.0%)	Finding RRF (Limit: >0.05)	Associated Samples	Qualifications
	6/16/09	DA603	NNN		0.047	9-14, 16, 18-20, 24, 25, 89404 MB	J/NJ/A (CC)

CONCAL.2S

LDC #: 21495F2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Blanks

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

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

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

Y N N/A Was a method blank analyzed for each matrix?
Y N N/A Was a method blank analyzed for each concentration preparation level?
Y N N/A Was a method blank associated with every sample?
Y N N/A Was the blank contaminated? If yes, please see qualification below.

Blank extraction date: 6/09/09 **Blank analysis date:** 6/11/09 (bl)
Conc. units: ug/kg Associated Samples: 1 - 8

Compound	Blank ID	Sample Identification								
	89048 MB	1	5	7	8					
AAA	5.7									
28.5 215 XX	43	96/U	76/U	96/U	69/U					
2.6 S	1.3	1.4/U		1.0/U						

Blank extraction date: 6/15/09 **Blank analysis date:** 6/16/09 (bl)
Conc. units: ug/kg Associated Samples: 14 - 21

Compound	Blank ID	Sample Identification								
	89404 MB	14 (10x)	15 (70x)	16	18	19	~~20~~			
2.6 S	1.3	(40)	(170) U	2.1/U	1.0/U	1.0/U				

5x Phthalates
2x all others

LDC #: 21495 F2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: JVG
2nd Reviewer:

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

Y N N/A Were field blanks identified in this SDG?
Y N N/A Were target compounds detected in the field blanks?

Blank units: ug/L **Associated sample units:** ug/kg
Sampling date: 7/21/09
Field blank type: (circle one) Field Blank / Rinsate / Other: Associated Samples: All Soils

Compound	Blank ID	Sample Identification								
(5x)	FB072109-SO									
7.0 EEE	1.4		(All results either ND or > FB)							
0.9 AAA	0.18									
7.5 XX	1.5									
1.75 LL	0.35									
CRQL										

Blank units: _____ **Associated sample units:** _____
Sampling date: _____
Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: _____

Compound	Blank ID	Sample Identification								
CRQL										

LDC #: 21495 F2a
SDG #: Cu Creek

VALIDATION FINDINGS WORKSHEET
Surrogate Recovery

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

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

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

(Y) N N/A Were percent recoveries (%R) for surrogates within QC limits?

(Y) N N/A If 2 or more base neutral or acid surrogates were outside QC limits, was a reanalysis performed to confirm %R?

(Y) N N/A If any %R was less than 10 percent, was a reanalysis performed to confirm %R?

#	Date	Sample ID	Surrogate	%R (Limits)	Qualifications
		4 (400X)	FBP	0 (45-135)	No qual
		15 (70X)	NBZ	( )	
		17 (100X)	TPH	( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
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				( )	
				( )	
				( )	
				( )	
				( )	

* QC limits are advisory

	QC Limits (Soil)	QC Limits (Water)
S1 (NBZ) = Nitrobenzene-d5	23-120	35-114
S2 (FBP) = 2-Fluorobiphenyl	30-115	43-116
S3 (TPH) = Terphenyl-d14	18-137	33-141
S4 (PHL) = Phenol-d5	24-113	10-94
S5 (2FP)= 2-Fluorophenol	25-121	21-100
S6 (TBP) = 2,4,6-Tribromophenol	19-122	10-123
S7 (2CP) = 2-Chlorophenol-d4	20-130*	33-110*
S8 (DCB) = 1,2-Dichlorobenzene-d4	20-130*	16-110*

LDC #: 21495 F29
SDG #: Eu Crev

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

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

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

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

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

Y N N/A Was a MS/MSD analyzed every 20 samples of each matrix?

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		22/23	SS	3 (50-150)	( )	( )	1	No qual (MSD in)
			RRR	6 (↓)	( )	161 (30)	↓	
				( )	( )	( )		
				( )	( )	( )		
		24/25	RRR	32 (50-150)	45 (50-150)	35 (30)	10	(LCS/D in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
		26/27	SS	1216 (50-150)	1568 (50-150)	( )	16, 17	(LCS in)
			RRR	32 (↓)	20 (↓)	47 (30)	↓	(LCS/D in)
			UUU	704 (↓)	1711 (↓)	36 (↓)	↓	
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

	Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)		Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)
A.	Phenol	26-90%	≤ 35%	12-110%	≤ 42%	GG.	Acenaphthene	31-137%	≤ 19%	46-118%	≤ 31%
C.	2-Chlorophenol	25-102%	≤ 50%	27-123%	≤ 40%	II.	4-Nitrophenol	11-114%	≤ 50%	10-80%	≤ 50%
E.	1,4-Dichlorobenzene	28-104%	≤ 27%	36-97%	≤ 28%	KK.	2,4-Dinitrotoluene	28-89%	≤ 47%	24-96%	≤ 38%
J.	N-Nitroso-di-n-propylamine	41-126%	≤ 38%	41-116%	≤ 38%	TT.	Pentachlorophenol	17-109%	≤ 47%	9-103%	≤ 50%
R.	1,2,4-Trichlorobenzene	38-107%	≤ 23%	39-98%	≤ 28%	ZZ.	Pyrene	35-142%	≤ 36%	26-127%	≤ 31%
V.	4-Chloro-3-methylphenol	26-103%	≤ 33%	23-97%	≤ 42%						

LDC #: 21495 F2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

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

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

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

(Y) N N/A Was a LCS required?

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		89048 LCS/D	XX	139 (50-120)	( )	( )	1-8, 89048 MB	No qual (LCSD in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
		89404 LCS/D	XX	( )	174 (50-120)	57 (30)	14-21, 89404 MB	(LCS in)
			SS	( )	( )	34 (↓)	↓	(LCS/D in)
			TTT	48 (50-120)	( )	( )		↓ (LCSD in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
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				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC #: 21495F1a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

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

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

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

Y N (N/A) Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound?

Y N (N/A) Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		1, ~~3~~	SS > cal range		J dets /A (e)
		14, 16, 3	SS, NNN > cal range		

Comments: See sample calculation verification worksheet for recalculations

LDC #: 21495F2q
SDG #: Cu Cmv

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

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

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

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

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

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

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		1, 3	SS > cal range		X/A (o)
		2, 4	All except SS dil		
		14, 16, 3	SS, MMM > cal range		
		15, 17, 4	All except SS, MMM dil		

Comments: _____

OVR.2S

LDC #: 21495F29
SDG #: Lg Conv

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: JVG
2nd reviewer:

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

Y N N/A Were field duplicate pairs identified in this SDG?
Y N N/A Were target compounds identified in the field duplicate pairs?

Compound	Concentration (ug/Kg) 19	20	RPD
DDD	4.1	3.8	0.3 (≤ 6.8 Diff)
YY	3.8	3.1	0.7
SS	250	240	4 (≤ 50 % RPD)
S	1.0	6.8 U	5.8 (≤ 6.8 Diff)
UU	3.8	3.8	0
ZZ	2.7	2.7	0

Compound	Concentration ( )		RPD
UUU	50	47	6 (≤ 50 % RPD)

Compound	Concentration ( )		RPD

Compound	Concentration ( )		RPD

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 23, 2009

Matrix: Soil

Parameters: Semivolatiles

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903443

Sample Identification

SA197-0.5B
SA198-0.5B
SA64-0.5B
SA104-0.5B
SA129-0.5B
SA70-0.5B
SA60-0.5B
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
SA197-0.5BMS
SA197-0.5BMSD
SA150-0.5BMS
SA150-0.5BMSD
SA53-0.5BMS
SA53-0.5BMSD

Introduction

This data review covers 25 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

This review follows 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 V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.

J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.

J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.

U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.

R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.

UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.

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. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

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

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

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
5/22/09	Octachlorostyrene	0.048 (≥0.05)	SA197-0.5B SA198-0.5B SA64-0.5B SA104-0.5B SA129-0.5B SA70-0.5B SA60-0.5B SA150-0.5B RSAN5-0.5B SA53-0.5B SA201-28B SA201009-28B SA43009-0.5B SA40-0.5B SA200-0.5B RSAO6-0.5B SA51-0.5B SA43-0.5B SA197-0.5BMS SA197-0.5BMSD SA150-0.5BMS SA150-0.5BMSD SA53-0.5BMS SA53-0.5BMSD 89972MB 90095MB 90256MB	J (all detects) UJ (all non-detects)	A

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

All of the continuing calibration RRF values were greater than or equal to 0.05 with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/24/09	Octachlorostyrene	0.044 (≥0.05)	SA197-0.5B SA197-0.5BMS 89972MB	J (all detects) UJ (all non-detects)	A

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/26/09	Octachlorostyrene	0.049 (≥0.05)	SA198-0.5B SA104-0.5B	J (all detects) UJ (all non-detects)	A

V. Blanks

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

Method Blank ID	Extraction Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
90256MB	6/26/09	Di-n-butylphthalate	74 ug/Kg	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
90095MB	6/24/09	Naphthalene	1.0 ug/Kg	SA60-0.5B SA150-0.5B

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

Sample	Compound TIC (RT in minutes)	Reported Concentration	Modified Final Concentration
RSAN5-0.5B	Di-n-butylphthalate	140 ug/Kg	140U ug/Kg
SA53-0.5B	Di-n-butylphthalate	96 ug/Kg	96U ug/Kg
SA201-28B	Di-n-butylphthalate	130 ug/Kg	130U ug/Kg
SA201009-28B	Di-n-butylphthalate	140 ug/Kg	140U ug/Kg
SA43009-0.5B	Di-n-butylphthalate	110 ug/Kg	110U ug/Kg
SA200-0.5B	Di-n-butylphthalate	140 ug/Kg	140U ug/Kg

Sample FB072109-SO (from SDG R0904016) was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072109-SO	7/21/09	Bis(2-ethylhexyl)phthalate Butylbenzylphthalate Di-n-butylphthalate Diethylphthalate	1.4 ug/Kg 0.18 ug/Kg 1.5 ug/Kg 0.35 ug/Kg	SA201-10B SA201-28B SA201009-28B

Sample concentrations were compared to concentrations detected in the field blanks as required by the QAPP. No sample data was qualified.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for SA60-0.5B. Since this sample was diluted out, no data were qualified.

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. 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.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment

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

XVI. Field Duplicates

Samples SA201-28B and SA201009-28B and samples SA43009-0.5B and SA43-0.5B were identified as field duplicates. No semivolatiles were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA43009-0.5B	SA43-0.5B				
2-Methylnaphthalene	14U	4.3	-	9.7 (≤21)	-	-
Acenaphthylene	4.3	8.7	-	4.4 (≤21)	-	-
Anthracene	7.2	11	-	3.8 (≤21)	-	-
Benzo(a)anthracene	64	130	-	131 (≤21)	J (all detects)	A
Benzo(a)pyrene	100	200	67 (≤50)	-	J (all detects)	A
Benzo(b)fluoranthene	130	280	73 (≤50)	-	J (all detects)	A
Benzo(g,h,i)perylene	150	260	54 (≤50)	-	J (all detects)	A
Benzo(k)fluoranthene	98	190	64 (≤50)	-	J (all detects)	A
Chrysene	140	300	73 (≤50)	-	J (all detects)	A

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA43009-0.5B	SA43-0.5B				
Di-n-butylphthalate	110	550U	-	440 (≤550)	-	-
Dibenzo(a,h)anthracene	30	51	-	21 (≤21)	-	-
Fluoranthene	160	440	93 (≤50)	-	J (all detects)	A
Hexachlorobenzene	78	80	-	2 (≤21)	-	-
Indeno(1,2,3-cd)-pyrene	110	200	58 (≤50)	-	J (all detects)	A
Naphthalene	6.5	8.7	-	2.2 (≤21)	-	-
Phenanthrene	59	150	-	91 (≤21)	J (all detects)	A
Pyrene	130	350	92 (≤50)	-	J (all detects)	A
Octachlorostyrene	32	26	-	6 (≤21)	-	-

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA201-28B	SA201009-28B				
Di-n-butylphthalate	130	140	-	10 (≤220)	-	-
Hexachlorobenzene	11	11	-	0 (≤8.4)	-	-
Octachlorostyrene	5.1	8.4U	-	3.3 (≤8.4)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG R0903443

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903443	SA197-0.5B SA198-0.5B SA64-0.5B SA104-0.5B SA129-0.5B SA70-0.5B SA60-0.5B SA150-0.5B RSAN5-0.5B SA53-0.5B SA201-28B SA201009-28B SA43009-0.5B SA40-0.5B SA200-0.5B RSAO6-0.5B SA51-0.5B SA43-0.5B	Octachlorostyrene	J (all detects) UJ (all non-detects)	A	Initial calibration (RRF) (c)
R0903443	SA197-0.5B SA198-0.5B SA104-0.5B	Octachlorostyrene	J (all detects) UJ (all non-detects)	A	Continuing calibration (RRF) (c)
R0903443	SA197-0.5B SA198-0.5B SA64-0.5B SA104-0.5B SA129-0.5B SA70-0.5B SA60-0.5B 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)
R0903443	SA43009-0.5B SA43-0.5B	Benzo(a)anthracene Phenanthrene	J (all detects) J (all detects)	A	Field duplicates (Difference) (fd)
R0903443	SA43009-0.5B SA43-0.5B	Benzo(a)pyrene Benzo(b)fluoranthene Benzo(g,h,i)perylene Benzo(k)fluoranthene Chrysene Fluoranthene Indeno(1,2,3-cd)-pyrene Pyrene	J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects)	A	Field duplicates (RPD) (fd)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG R0903443

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P	Code
R0903443	RSAN5-0.5B	Di-n-butylphthalate	140U ug/Kg	A	bl
R0903443	SA53-0.5B	Di-n-butylphthalate	96U ug/Kg	A	bl
R0903443	SA201-28B	Di-n-butylphthalate	130U ug/Kg	A	bl
R0903443	SA201009-28B	Di-n-butylphthalate	140U ug/Kg	A	bl
R0903443	SA43009-0.5B	Di-n-butylphthalate	110U ug/Kg	A	bl
R0903443	SA200-0.5B	Di-n-butylphthalate	140U ug/Kg	A	bl

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles- Field Blank Data Qualification Summary - SDG R0903443

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21495G2a
SDG #: R0903443
Laboratory: Columbia Analytical Services

Date: 9/16/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/19-24/09
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	SW	% RSD r
IV.	Continuing calibration/ICV	SW	CCV/ICV ≤ 25 %
V.	Blanks	SW	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	SW	D_1 = 12, 13 D_2 = 14, 19
XVII.	Field blanks	SW	FB = FBQ72109-50 from R0904016

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

Validated Samples: Soil

1	1	SA197-0.5B	11	3	SA201-10B		21	1	SA197-0.5BMSD	31	1	89972 MB
2	1	SA198-0.5B	12	3	SA201-28B	D_1	22	r	SA150-0.5BMS	± 32	r	90095 MB
3	1	SA64-0.5B	13	3	SA201009-28B	D_1	23	r	SA150-0.5BMSD	± 33	3	90256 MB
4	1	SA104-0.5B	14	3	SA43009-0.5B	D_r	24	3	SA53-0.5BMS	34		
5	1	SA129-0.5B	15	3	SA40-0.5B		25	3	SA53-0.5BMSD	35		
6	1	SA70-0.5B	16	3	SA200-0.5B		26			36		
7	r	SA60-0.5B	17	3	RSAO6-0.5B		27			37		
8	r	SA150-0.5B	18	3	SA51-0.5B		28			38		
9	3	RSAN5-0.5B	19	3	SA43-0.5B	D_r	29			39		
10	3	SA53-0.5B	20	1	SA197-0.5BMS		30			40		

(no r)

VALIDATION FINDINGS WORKSHEET

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

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

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

COMPNDL

LDC #: 21495 G29
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration

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

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

(Y) N N/A Did the laboratory conduct an acceptable 5 point calibration prior to sample analysis?
(Y) N N/A Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's?
Y N (N/A) Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation? ~~NA~~
Y N (N/A) Did the initial calibration meet the acceptance criteria?
Y (N) N/A Were all %RSDs and RRFs within the validation criteria of ≤30 %RSD and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %RSD (Limit: ≤30.0%)	Finding RRF (Limit: ≥0.05)	Associated Samples	Qualifications
	5/22/09	ICAL	1111		0.048	All except 11 + All Blks	J/UJ/A (c)
	7/01/09	ICAL	~~1111~~		~~0.049~~	~~11~~	

INICAL2S

LDC #: 21495G2
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Reviewer: JVG
2nd Reviewer: [illegible]

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

(Y) N N/A Was a continuing calibration standard analyzed at least once every 12 hours of sample analysis for each instrument?
Y N N/A Were percent differences (%D) and relative response factors (RRF) within method criteria for all CCC's and SPCC's ?
Y (N) N/A Were all %D and RRFs within the validation criteria of ≤25 %D and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %D (Limit: ≤25.0%)	Finding RRF (Limit: >0.05)	Associated Samples	Qualifications
	6/24/09	DA682 (CCV)	UUU		0.044	1, 20, 89972 MB	J/UJ/A (c)
	6/26/09	DA733 (CCV)	UUU		0.049	2,4	↓ ↓

LDC #: 21495 G2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Blanks

Page: 1 of 1
Reviewer: JVG
2nd Reviewer: 9

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

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

Y N N/A Was a method blank analyzed for each matrix?
Y N N/A Was a method blank analyzed for each concentration preparation level?
Y N N/A Was a method blank associated with every sample?
Y N N/A Was the blank contaminated? If yes, please see qualification below.

(b1)

Blank extraction date: 6/26/09 **Blank analysis date:** 6/29/09
Conc. units: ug/kg Associated Samples: 9-19

Compound	Blank ID	Sample Identification								
	90256 MB	9	10	12	13	14	16			
370 XX	74	140/U	96/U	130/U	140/U	110/U	140/U			

Blank extraction date: 6/24/09 **Blank analysis date:** 6/25/09
Conc. units: ug/kg Associated Samples: 7, 8 (ND)

Compound	Blank ID	Sample Identification								
	90095 MB	7								
5	1.0									

5x Phthalates
2x all others

LDC #: 21495G2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: JVG
2nd Reviewer: [illegible]

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

Y N N/A Were field blanks identified in this SDG?
Y N N/A Were target compounds detected in the field blanks?

Blank units: ug/L **Associated sample units:** ug/Kg
Sampling date: 7/21/09
Field blank type: (circle one) Field Blank / Rinsate / Other:_____ Associated Samples: 11 - 13

Compound	Blank ID	Sample Identification								
	FB072109-SO									
EEE	1.4		(All Results either ND or > MB)							
AAA	0.18				↓					
XX	1.5									
LL	0.35									
CRQL										

Blank units:_____ **Associated sample units:**_____
Sampling date:_____
Field blank type: (circle one) Field Blank / Rinsate / Other:_____ Associated Samples:_____

Compound	Blank ID	Sample Identification								
CRQL										

5x Phthalates
2x all others

LDC #: 21495G2a
SDG #: See
METHOD: GC/MS BNA (EPA SW 846 Method 8270C)

Reviewer: JVG
2nd Reviewer: Q

VALIDATION FINDINGS WORKSHEET
Surrogate Recovery

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

Y (N) N/A Were percent recoveries (%R) for surrogates within QC limits?
Y N N/A If 2 or more base neutral or acid surrogates were outside QC limits, was a reanalysis performed to confirm %R?
Y N N/A If any %R was less than 10 percent, was a reanalysis performed to confirm %R?

#	Date	Sample ID	Surrogate	%R (Limits)	Qualifications
		7 (12X)	FBP	0 (45-135)	No qual
			NBZ	↓ (↓)	↓
			TPH	( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

* QC limits are advisory

Surrogate	QC Limits (Soil)	QC Limits (Water)
S1 (NBZ) = Nitrobenzene-d5	23-120	35-114
S2 (FBP) = 2-Fluorobiphenyl	30-115	43-116
S3 (TPH) = Terphenyl-d14	18-137	33-141
S4 (PHL) = Phenol-d5	24-113	10-94
S5 (2FP)= 2-Fluorophenol	25-121	21-100
S6 (TBP) = 2,4,6-Tribromophenol	19-122	10-123
S7 (2CP) = 2-Chlorophenol-d4	20-130*	33-110*
S8 (DCB) = 1,2-Dichlorobenzene-d4	20-130*	16-110*

LDC #: 21495 G2C
SDG #: See Cvr

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

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

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

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

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

Y N N/A Was a MS/MSD analyzed every 20 samples of each matrix?

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		20/21	RRR	( )	( )	39 (30)	1	No qual (2 R in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
		22/23	SS	( )	12 (50-150)	( )	8	No qual (MS or MSD in)
			RRR	10 (50-150)	~~59~~ ( )	142 (30)		
			TTT	( )	( )	38 (↓)	↓	↓ ↓
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
		24/25	RRR	0 (50-150)	39 (50-150)	200 (30)	10	No qual (LCS/D in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

	Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)		Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)
A.	Phenol	26-90%	≤ 35%	12-110%	≤ 42%	GG.	Acenaphthene	31-137%	≤ 19%	46-118%	≤ 31%
C.	2-Chlorophenol	25-102%	≤ 50%	27-123%	≤ 40%	II.	4-Nitrophenol	11-114%	≤ 50%	10-80%	≤ 50%
E.	1,4-Dichlorobenzene	28-104%	≤ 27%	36-97%	≤ 28%	KK.	2,4-Dinitrotoluene	28-89%	≤ 47%	24-96%	≤ 38%
J.	N-Nitroso-di-n-propylamine	41-126%	≤ 38%	41-116%	≤ 38%	TT.	Pentachlorophenol	17-109%	≤ 47%	9-103%	≤ 50%
R.	1,2,4-Trichlorobenzene	38-107%	≤ 23%	39-98%	≤ 28%	ZZ.	Pyrene	35-142%	≤ 36%	26-127%	≤ 31%
V.	4-Chloro-3-methylphenol	26-103%	≤ 33%	23-97%	≤ 42%						

LDC #: 21495 G2A
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

Reviewer: DVG
2nd Reviewer: [illegible]

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

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

Y ~~N~~ N/A Was a LCS required?

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		89972 LCS/D	EEE	121 (50-120)	( )	( )	1-6, 89972MB	No qual (LCSD in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
		90095 LCS/D	EEE	128 (50-120)	127 (50-120)	( )	7,8, 90095MB	No qual (MS/MSD in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
		90256 LCS/D	XX	132 (50-150)	178 (50-150)	( )	9-19, 90256MB	No qual (MS/MSD in) (LCSD in)
			UUU	122 (50-120)	( )	( )	↓	↓
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC#: 21495G2
SDG#:See cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: JV
2nd Reviewer:

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

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

Compound Name	Conc (ug/Kg)		RPD (≤50%)	Diff	Diff Limits	Quals (Parent Only)
	14	19				
2-Methylnaphthalene	14U	4.3		9.7	≤14	-
Acenaphthylene	4.3	8.7		4.4	≤21	-
Anthracene	7.2	11		3.8	≤21	-
Benzo(a)anthracene	64	130		131	≤21	Jdets/A (fd)
Benzo(a)pyrene	100	200	67			
Benzo(b)fluoranthene	130	280	73			
Benzo(g,h,i)perylene	150	260	54			
Benzo(k)fluoranthene	98	190	64			
Chrysene	140	300	73			
Di-n-butylphthalate	110	550U		440	≤550	-
Dibenzo(a,h)anthracene	30	51		21	≤21	-
Fluoranthene	160	440	93			Jdets/A
Hexachlorobenzene	78	80		2	≤21	-
Indeno(1,2,3-cd)-pyrene	110	200	58			Jdets/A
Naphthalene	6.5	8.7		2.2	≤21	-
Phenanthrene	59	150		91	≤21	Jdets/A
Pyrene	130	350	92			
Octachlorostyrene	32	26		6	≤21	-

Compound Name	Conc (ug/Kg)		RPD (≤50%)	Diff	Diff Limits	Quals (Parent Only)
	12	13				
Di-n-Butylphthalate	130	140		10	≤220	-
Hexachlorobenzene	11	11		0	≤8.4	-
Octachlorostyrene	5.1	8.4U		3.3	≤8.4	-

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: October 2, 2009

Matrix: Soil

Parameters: Semivolatiles

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903615

Sample Identification

SA45-0.5B
SA452009-0.5B
SA187-0.5B
SA153-0.5B
SA186-0.5B
SA185-0.5B
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
SA106-0.5BMS
SA106-0.5BMSD

Introduction

This data review covers 18 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

This review follows 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 V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.

J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.

J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.

U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.

R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.

UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.

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. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

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

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

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

All of the continuing calibration RRF values were greater than or equal to 0.05 .

V. Blanks

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

Method Blank ID	Extraction Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
90598MB	7/1/09	Di-n-butylphthalate Naphthalene	37 ug/Kg 1.0 ug/Kg	SA45-0.5B SA452009-0.5B SA187-0.5B SA153-0.5B SA186-0.5B SA185-0.5B RSAO5-0.5B SA152-10B SA152-20B SA152-34B
90695MB	7/2/09	Di-n-butylphthalate Naphthalene	120 ug/Kg 1.7 ug/Kg	SA50-0.5B SA54-0.5B SA106-0.5B SA102-0.5B SA109-0.5B

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

Sample	Compound TIC (RT in minutes)	Reported Concentration	Modified Final Concentration
SA45-0.5B (2X)	Di-n-butylphthalate	100 ug/Kg	100U ug/Kg
SA452009-0.5B (2X)	Di-n-butylphthalate Naphthalene	100 ug/Kg 2.1 ug/Kg	100U ug/Kg 2.1U ug/Kg
SA153-0.5B	Di-n-butylphthalate Naphthalene	190 ug/Kg 1.7 ug/Kg	190U ug/Kg 1.7U ug/Kg
SA185-0.5B	Di-n-butylphthalate Naphthalene	53 ug/Kg 1.1 ug/Kg	53U ug/Kg 1.1U ug/Kg
RSAO5-0.5B (2X)	Di-n-butylphthalate Naphthalene	85 ug/Kg 2.1 ug/Kg	85U ug/Kg 2.1U ug/Kg
SA152-10B	Di-n-butylphthalate Naphthalene	160 ug/Kg 1.1 ug/Kg	160U ug/Kg 1.1U ug/Kg
SA152-20B	Di-n-butylphthalate	51 ug/Kg	51U ug/Kg
SA152-34B	Di-n-butylphthalate	150 ug/Kg	150U ug/Kg

Sample	Compound TIC (RT in minutes)	Reported Concentration	Modified Final Concentration
SA50-0.5B	Di-n-butylphthalate Naphthalene	140 ug/Kg 1.8 ug/Kg	140U ug/Kg 1.8U ug/Kg
SA54-0.5B	Di-n-butylphthalate Naphthalene	41 ug/Kg 2.0 ug/Kg	41U ug/Kg 2.0U ug/Kg
SA106-0.5B (50X)	Naphthalene	98 ug/Kg	98U ug/Kg
SA102-0.5B	Di-n-butylphthalate	110 ug/Kg	110U ug/Kg
SA109-0.5B	Di-n-butylphthalate Naphthalene	48 ug/Kg 2.5 ug/Kg	48U ug/Kg 2.5U ug/Kg

Sample FB072109-SO (from SDG R0904016) was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072109-SO	7/21/09	Bis(2-ethylhexyl)phthalate Butylbenzylphthalate Di-n-butylphthalate Diethylphthalate	1.4 ug/Kg 0.18 ug/Kg 1.5 ug/Kg 0.35 ug/Kg	SA152-10B SA152-20B SA152-34B

Sample concentrations were compared to concentrations detected in the field blanks as required by the QAPP. No sample data was qualified.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for SA106-0.5B. Since the sample was diluted out, no data were qualified.

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. 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.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment

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

XVI. Field Duplicates

Samples SA45-0.5B and SA452009-0.5B were identified as field duplicates. No semivolatiles 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				
Di-n-butylphthalate	100	100	-	0 (≤300)	-	-
Naphthalene	14U	2.1	-	11.9 (≤14)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG R0903615

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903615	SA45-0.5B SA452009-0.5B SA187-0.5B SA153-0.5B SA186-0.5B SA185-0.5B 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)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG R0903615

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P	Code
R0903615	SA45-0.5B (2X)	Di-n-butylphthalate	100U ug/Kg	A	bl
R0903615	SA452009-0.5B (2X)	Di-n-butylphthalate Naphthalene	100U ug/Kg 2.1U ug/Kg	A	bl
R0903615	SA153-0.5B	Di-n-butylphthalate Naphthalene	190U ug/Kg 1.7U ug/Kg	A	bl
R0903615	SA185-0.5B	Di-n-butylphthalate Naphthalene	53U ug/Kg 1.1U ug/Kg	A	bl
R0903615	RSAO5-0.5B (2X)	Di-n-butylphthalate Naphthalene	85U ug/Kg 2.1U ug/Kg	A	bl
R0903615	SA152-10B	Di-n-butylphthalate Naphthalene	160U ug/Kg 1.1U ug/Kg	A	bl
R0903615	SA152-20B	Di-n-butylphthalate	51U ug/Kg	A	bl
R0903615	SA152-34B	Di-n-butylphthalate	150U ug/Kg	A	bl
R0903615	SA50-0.5B	Di-n-butylphthalate Naphthalene	140U ug/Kg 1.8U ug/Kg	A	bl

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P	Code
R0903615	SA54-0.5B	Di-n-butylphthalate Naphthalene	41U ug/Kg 2.0U ug/Kg	A	bl
R0903615	SA106-0.5B (50X)	Naphthalene	98U ug/Kg	A	bl
R0903615	SA102-0.5B	Di-n-butylphthalate	110U ug/Kg	A	bl
R0903615	SA109-0.5B	Di-n-butylphthalate Naphthalene	48U ug/Kg 2.5U ug/Kg	A	bl

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles- Field Blank Data Qualification Summary - SDG R0903615

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21495H2a
SDG #: R0903615
Laboratory: Columbia Analytical Services

Date: 9/18/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer: [illegible]

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/29-30/09
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 25 %
V.	Blanks	SW	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	SW	D = 1, 2
XVII.	Field blanks	SW	FB = FB072109-SO from R0904016

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

Validated Samples: soil

1	1	SA45-0.5B	D	11	Y	SA50-0.5B	+21	1	90598 MB	31	
2	1	SA452009-0.5B	D	12	Y	SA54-0.5B	+22	Y	90695 MB	32	
3	1	SA187-0.5		13	Y	SA106-0.5B	23			33	
4	1	SA153-0.5B		14	Y	SA102-0.5B	24			34	
5	1	SA186-0.5B		15	Y	SA109-0.5B	25			35	
6	1	SA185-0.5B		16	1	SA45-0.5BMS	26			36	
7	1	RSAO5-0.5B		17	Y	SA106-0.5BMS	27			37	
8	1	SA152-10B		18	Y	SA106-0.5BMSD	28			38	
9	1	SA152-20B		19			29			39	
10	(	SA152-34B		20			30			40	

(no r2)

VALIDATION FINDINGS WORKSHEET

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

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

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

LDC #: 21495 H2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Blanks

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

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

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

Y N N/A Was a method blank analyzed for each matrix?
Y N N/A Was a method blank analyzed for each concentration preparation level?
Y N N/A Was a method blank associated with every sample?
Y N N/A Was the blank contaminated? If yes, please see qualification below.

Blank extraction date: 7/01/09 **Blank analysis date:** 7/08/09
Conc. units: ug/Kg Associated Samples: 1-10 (bl)

Compound	Blank ID	Sample Identification									
	90598 MB	1 (2x)	2 (2x)	3 (10x)	4	5 (3x)	* 6	7 (2x)	8	9	10
XX	37	100/U	100/U		190		53/U	85/U	160/U	51/U	150/U
S	1.0		2.1/U	(56)	1.7/U	(6.3)	1.1/U	2.1/U	1.1/U		

Blank extraction date: 7/02/09 **Blank analysis date:** 7/07/09
Conc. units: ug/Kg Associated Samples: 11-15 (bl)

Compound	Blank ID	Sample Identification								
	90695 MB	11	12	13 (50x)	14	15				
600 XX	120	140/U	41/U		110/U	48/U				
3.4 S	1.7	1.8/U	2.0/U	98/U	(6.4)	2.5/U				

5x Phthalates
2x all others

LDC #: 21495 H2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: JVC
2nd Reviewer:

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

Y N N/A Were field blanks identified in this SDG?
Y N N/A Were target compounds detected in the field blanks?

Blank units: ug/L **Associated sample units:** ug/kg
Sampling date: 7/21/09
Field blank type: (circle one) Field Blank / Rinsate / Other:_____ Associated Samples: 8-10

Compound	Blank ID	Sample Identification								
(5x)	FB072109-SO	8	9	10						
7.0 EEE	1.4									
0.9 AAA	0.18									
7.5 XX	1.5	(160)	(51)	(150)						
1.75 LL	0.35									
CRQL										

Blank units:_____ **Associated sample units:**_____
Sampling date:_____
Field blank type: (circle one) Field Blank / Rinsate / Other:_____ Associated Samples:_____

Compound	Blank ID	Sample Identification								
CRQL										

5x Phthalates
2x all others

LDC #: 21495H29a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Recovery

Reviewer: JVG
2nd Reviewer:

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

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

(Y) N N/A Were percent recoveries (%R) for surrogates within QC limits?

(Y) N N/A If 2 or more base neutral or acid surrogates were outside QC limits, was a reanalysis performed to confirm %R?

(Y) N N/A If any %R was less than 10 percent, was a reanalysis performed to confirm %R?

#	Date	Sample ID	Surrogate	%R (Limits)	Qualifications
		13 (50x)	FBP	0 (45-135)	No qual
			NBZ	( )	
			TPH	( )	
				( )	
				( )	
				( )	
				( )	
				( )	
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				( )	
				( )	
				( )	

* QC limits are advisory	QC Limits (Soil)	QC Limits (Water)		QC Limits (Soil)	QC Limits (Water)
S1 (NBZ) = Nitrobenzene-d5	23-120	35-114	S5 (2FP)= 2-Fluorophenol	25-121	21-100
S2 (FBP) = 2-Fluorobiphenyl	30-115	43-116	S6 (TBP) = 2,4,6-Tribromophenol	19-122	10-123
S3 (TPH) = Terphenyl-d14	18-137	33-141	S7 (2CP) = 2-Chlorophenol-d4	20-130*	33-110*
S4 (PHL) = Phenol-d5	24-113	10-94	S8 (DCB) = 1,2-Dichlorobenzene-d4	20-130*	16-110*

LDC #: 21495 H2a
SDG #: Cu Cmpl

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Page: 1 of 1
Reviewer: JV6
2nd Reviewer:

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

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

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

(Y) N N/A Was a MS/MSD analyzed every 20 samples of each matrix?

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		17/18	W	112 (35-108)	( )	( )	13	No qual (MSD in)
			XX	( )	175 (50-150)	( )		(MS in)
			SS	1837 (50-150)	362 (50-150)	( )		(LCS/D in)
			L	( )	( )	33 (30)		(MS/MSD in)
			RRR	0 (50-150)	0 (50-150)	( )		(LCS/D in)
			UUU	375 ( )	( )	( )		(MSD in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

	Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)		Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)
A.	Phenol	26-90%	≤ 35%	12-110%	≤ 42%	GG	Acenaphthene	31-137%	≤ 19%	46-118%	≤ 31%
C.	2-Chlorophenol	25-102%	≤ 50%	27-123%	≤ 40%	II.	4-Nitrophenol	11-114%	≤ 50%	10-80%	≤ 50%
E.	1,4-Dichlorobenzene	28-104%	≤ 27%	36-97%	≤ 28%	KK.	2,4-Dinitrotoluene	28-89%	≤ 47%	24-96%	≤ 38%
J.	N-Nitroso-di-n-propylamine	41-126%	≤ 38%	41-116%	≤ 38%	TT.	Pentachlorophenol	17-109%	≤ 47%	9-103%	≤ 50%
R.	1,2,4-Trichlorobenzene	38-107%	≤ 23%	39-98%	≤ 28%	ZZ.	Pyrene	35-142%	≤ 36%	26-127%	≤ 31%
V.	4-Chloro-3-methylphenol	26-103%	≤ 33%	23-97%	≤ 42%						

LDC #: 21495 H2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

Reviewer: JVG
2nd Reviewer: ______

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

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

(Y) N N/A Was a LCS required?

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		90598 LCS/D	EEE	140 (50-120)	130 (50-120)	( )	1-10, 90598MB	No qual (MS in)
			XX	( )	154 (↓)	( )	↓	(LCS in)
			UUU	( )	121 (↓)	( )		↓
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
		90695 LCS/D	EEE	136 (50-120)	146 (50-120)	( )	11-15, 90695MB	No qual (MS/MSD in)
			XX	139 (↓)	136 (↓)	( )	↓	↓ (MS in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
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				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC #: 21495 H2a
SDG #: Surface

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: JVG
2nd reviewer:

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

(Y) N N/A Were field duplicate pairs identified in this SDG?
(Y) N N/A Were target compounds identified in the field duplicate pairs?

Compound	Concentration (ug/kg)		RPD
	1	2	
XX	100	100	0 (≤ 360 Diff.)
S	14 U	2.1	11.9 (≤ 14 Diff.)

Compound	Concentration ( )		RPD

Compound	Concentration ( )		RPD

Compound	Concentration ( )		RPD

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: Semivolatiles

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903678

Sample Identification

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
RSAK3-0.5BDL
RSAK3-10B
RSAK3-20B
RSAK3-31B
SA82-0.5BMS
SA82-0.5BMSD
RSAK3-31BMS
RSAK3-31BMSD

Introduction

This data review covers 24 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 8270C for Semivolatiles.

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 V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.

J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.

J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.

U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.

R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.

UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.

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. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

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

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

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

All of the continuing calibration RRF values were greater than or equal to 0.05 .

V. Blanks

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

Method Blank ID	Extraction Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
90847MB	7/8/09	Naphthalene	1.0 ug/Kg	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 RSAK3-20B RSAK3-31B

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

Sample	Compound TIC (RT in minutes)	Reported Concentration	Modified Final Concentration
SA114-0.5B (10X)	Naphthalene	14 ug/Kg	14U ug/Kg
SA114009-0.5B (12X)	Naphthalene	18 ug/Kg	18U ug/Kg
SA82-10B (3X)	Naphthalene	3.2 ug/Kg	3.2U ug/Kg
SA88-20B	Naphthalene	1.4 ug/Kg	1.4U ug/Kg
RSAK3-20B	Naphthalene	1.8 ug/Kg	1.8U ug/Kg

Sample FB072109-SO (from SDG R0904016) was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072109-SO	7/21/09	Bis(2-ethylhexyl)phthalate Butylbenzylphthalate Di-n-butylphthalate Diethylphthalate	1.4 ug/Kg 0.18 ug/Kg 1.5 ug/Kg 0.35 ug/Kg	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 RSAK3-0.5BDL RSAK3-10B RSAK3-20B RSAK3-31B

Sample concentrations were compared to concentrations detected in the field blanks as required by the QAPP. No sample data was qualified.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for RSAK3-0.5BDL. Since this sample was diluted out, no data were qualified.

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

LCS ID (Associated Samples)	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
90766LCS/D (EB070109-SO1 90766MB)	Pyridine 1,4-Dioxane	26 (50-120) 47 (50-120)	25 (50-120) 48 (50-120)	- -	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P

LCS ID (Associated Samples)	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
90956LCS/D (RSAK3-0.5BDL RSAK3-10B 90956MB)	Bis(2-ethylhexyl)phthalate	127 (50-120)	147 (50-120)	-	J+ (all detects)	A

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All project quantitation limits were within validation criteria with the following exceptions:

Sample	Compound	Finding	Criteria	Flag	A or P
RSAK3-0.5B	Hexachlorobenzene Octachlorostyrene	Sample result exceeded calibration range.	Reported result should be within calibration range.	J (all detects) J (all detects)	A

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.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment

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
RSAK3-0.5B	Hexachlorobenzene Octachlorostyrene	X X	A
RSAK3-0.5BDL	All TCL compounds except Hexachlorobenzene Octachlorostyrene	X	A

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

XVI. Field Duplicates

Samples SA114-0.5B and SA114009-0.5B and samples SA134-31B and SA134009-31B were identified as field duplicates. No semivolatiles 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				
2-Methylnaphthalene	40	35	-	5 (≤87)	-	-
Benzo(a)anthracene	29	35	-	6 (≤87)	-	-
Benzo(g,h,i)perylene	22	87U	-	65 (≤87)	-	-
Chrysene	69	75	-	6 (≤87)	-	-
Fluoranthene	61	61		0 (≤87)	-	-
Hexachlorobenzene	2700	3100	14 (≤50)	-	-	-
Naphthalene	14	18	-	4 (≤87)	-	-
Phenanthrene	65	61	-	4 (≤87)	-	-
Pyrene	170	140	-	30 (≤87)	-	-

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA114-0.5B	SA114009-0.5B				
Octachlorostyrene	400	510	24 (≤50)	-	-	-

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA134-31B	SA134009-31B				
Butylbenzylphthalate	260U	11	-	249 (≤260)	-	-
Di-n-Butylphthalate	260U	82	-	178 (≤260)	-	-
Dimethyl phthalate	260U	3.1	-	256.9 (≤260)	-	-
Hexachlorobenzene	4.0	10U	-	6 (≤10)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG R0903678

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903678	EB070109-SO1	Pyridine 1,4-Dioxane	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P	Laboratory control samples (%R) (l)
R0903678	RSAK3-0.5BDL RSAK3-10B	Bis(2-ethylhexyl)phthalate	J+ (all detects)	A	Laboratory control samples (%R) (l)
R0903678	RSAK3-0.5B	Hexachlorobenzene Octachlorostyrene	J (all detects) J (all detects)	A	Project Quantitation Limit (e)
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 RSAK3-0.5BDL RSAK3-10B RSAK3-20B RSAK3-31B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
R0903678	RSAK3-0.5B	Hexachlorobenzene Octachlorostyrene	X X	A	Overall assessment of data (o)
R0903678	RSAK3-0.5BDL	All TCL compounds except Hexachlorobenzene Octachlorostyrene	X	A	Overall assessment of data (o)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG R0903678

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P	Code
R0903678	SA114-0.5B (10X)	Naphthalene	14U ug/Kg	A	bl

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P	Code
R0903678	SA114009-0.5B (12X)	Naphthalene	18U ug/Kg	A	bl
R0903678	SA82-10B (3X)	Naphthalene	3.2U ug/Kg	A	bl
R0903678	SA88-20B	Naphthalene	1.4U ug/Kg	A	bl
R0903678	RSAK3-20B	Naphthalene	1.8U ug/Kg	A	bl

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles- Field Blank Data Qualification Summary - SDG R0903678

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21495I2a
SDG #: R0903678
Laboratory: Columbia Analytical Services

Date: 9/18/09
Page: 1 of 1
Reviewer: VG
2nd Reviewer:

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 7/01 - 02/09
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 25%
V.	Blanks	SW	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	SW	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	SW	
XVI.	Field duplicates	SW	D_1 = 2, 3 D_2 = 12, 13
XVII.	Field blanks	SW	*EB = 1 FB = FB072109-SO from R0904016

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

Validated Samples:

1	EB070109-SO1	11	SA134-20B	21	RSAK3-31B	31	90766 MB
2	SA114-0.5B D_1	12	SA134-31B D_2	22	SA82-0.5BMS	32	90847 MB
3	SA114009-0.5B D_1	13	SA134009-31B D_2	23	SA82-0.5BMSD	33	90956 MB
4	RSAN6-0.5B	14	SA88-10B	24	RSAK3-31BMS	34	
5	SA82-0.5B	15	SA88-20B	25	RSAK3-31BMSD	35	
6	SA82-10B	16	SA88-32B	26		36	
7	SA82-29B	17	RSAK3-0.5B	27		37	
8	RSAL3-10B	18	RSAK3-0.5BDL	28		38	
9	RSAL3-30B	19	RSAK3-10B	29		39	
10	SA134-10B	20	RSAK3-20B	30		40	

(no r2)

VALIDATION FINDINGS WORKSHEET

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

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

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

LDC #: 21495 I 2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Blanks

Reviewer: JVG
2nd Reviewer: [illegible]

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

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

Y N N/A Was a method blank analyzed for each matrix?
Y N N/A Was a method blank analyzed for each concentration preparation level?
Y N N/A Was a method blank associated with every sample?
Y N N/A Was the blank contaminated? If yes, please see qualification below.

Blank extraction date: 7/08/09 **Blank analysis date:** 7/10/09
Conc. units: ug/kg Associated Samples: 2-16, 20, 21 (61)

Compound	Blank ID	Sample Identification								
	90847MB	2 (10x)	3 (12x)	6 (3x)	15	20				
2.0 S	1.0	14/U	18/U	3.2/U	1.4/U	1.8/U				

Blank extraction date: _____ **Blank analysis date:** _____
Conc. units: _____ Associated Samples: _____

Compound	Blank ID	Sample Identification								

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
Common contaminants such as the phthalates and TICs noted above that were detected in samples within ten times the associated method blank concentration were qualified as not detected, "U". Other contaminants within five times the method blank concentration were also qualified as not detected, "U".

LDC #: 21495 I 2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

Y N N/A Were field blanks identified in this SDG?

Y N N/A Were target compounds detected in the field blanks?

Blank units: ug/L **Associated sample units:** ug/kg

Sampling date: 7/21/09

Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: 5 - 21

Compound	Blank ID	Sample Identification								
(5x)	FB072109-SO									
7.0 EEE	1.4		(All results either ND or > FB)							
0.9 AAA	0.18									
7.5 XX	1.5									
1.75 LL	0.35									
CRQL										

Blank units: _____ **Associated sample units:** _____

Sampling date: _____

Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: _____

Compound	Blank ID	Sample Identification								
CRQL										

5x Phthalates
2x all others

LDC #: 21495 I2c
SDG #: Sa Cma

VALIDATION FINDINGS WORKSHEET
Surrogate Recovery

Reviewer: JV6
2nd Reviewer: Q

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

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

(Y) N N/A Were percent recoveries (%R) for surrogates within QC limits?
(Y) N N/A If 2 or more base neutral or acid surrogates were outside QC limits, was a reanalysis performed to confirm %R?
(Y) N N/A If any %R was less than 10 percent, was a reanalysis performed to confirm %R?

#	Date	Sample ID	Surrogate	%R (Limits)	Qualifications
		18 (100%)	FBP	0 (45-135)	No qual
			NBZ	( )	
			TPH	( )	
				( )	
				( )	
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				( )	

* QC limits are advisory	QC Limits (Soil)	QC Limits (Water)
S1 (NBZ) = Nitrobenzene-d5	23-120	35-114
S2 (FBP) = 2-Fluorobiphenyl	30-115	43-116
S3 (TPH) = Terphenyl-d14	18-137	33-141
S4 (PHL) = Phenol-d5	24-113	10-94
S5 (2FP)= 2-Fluorophenol	25-121	21-100
S6 (TBP) = 2,4,6-Tribromophenol	19-122	10-123
S7 (2CP) = 2-Chlorophenol-d4	20-130*	33-110*
S8 (DCB) = 1,2-Dichlorobenzene-d4	20-130*	16-110*

LDC #: 21495 I2g
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

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

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

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

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

Y N N/A Was a MS/MSD analyzed every 20 samples of each matrix?

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		22/23	EEE	151 (50-150)	( )	( )	5	No qual (MSD in)
			SS	-155 (50-150)	-89 (50-150)	( )	↓	(LCS/Dup)
			RRR	11 (↓)	0 (↓)	200 (30)	↓	↓
				( )	( )	( )		
				( )	( )	( )		
		24/25	RRR	( )	26 (50-150)	94 (30)	21	(MS in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

	Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)		Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)
A.	Phenol	26-90%	≤ 35%	12-110%	≤ 42%	GG.	Acenaphthene	31-137%	≤ 19%	46-118%	≤ 31%
C.	2-Chlorophenol	25-102%	≤ 50%	27-123%	≤ 40%	II.	4-Nitrophenol	11-114%	≤ 50%	10-80%	≤ 50%
E.	1,4-Dichlorobenzene	28-104%	≤ 27%	36-97%	≤ 28%	KK.	2,4-Dinitrotoluene	28-89%	≤ 47%	24-96%	≤ 38%
J.	N-Nitroso-di-n-propylamine	41-126%	≤ 38%	41-116%	≤ 38%	TT.	Pentachlorophenol	17-109%	≤ 47%	9-103%	≤ 50%
R.	1,2,4-Trichlorobenzene	38-107%	≤ 23%	39-98%	≤ 28%	ZZ.	Pyrene	35-142%	≤ 36%	26-127%	≤ 31%
V.	4-Chloro-3-methylphenol	26-103%	≤ 33%	23-97%	≤ 42%						

LDC #: 21495 I29
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

Page: 1 of 1
Reviewer: JV6
2nd Reviewer: [signature]

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

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

Y (N) N/A Was a LCS required?

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		90766 LCS/D	RRR	26 (50-120)	25 (50-120)	( )	1, 90766 MB	J- /UJ /P (l)
			TTT	47 (↓)	48 (↓)	( )	↓	↓ ↓
				( )	( )	( )		
				( )	( )	( )		
		90847 LCS/D	EEE	137 (50-120)	145 (50-120)	( )	2-16, 20, 21,	NO qual (MSD in)
				( )	( )	( )	90847 MB	
				( )	( )	( )		
		90956 LCS/D	EEE	127 (50-120)	147 (50-120)	( )	18, 19, 90956 MB	J+ dets/A (l)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC #: 21495 I2q
SDG #: Su Grv

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

Reviewer: SV6
2nd Reviewer: [signature]

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

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

Y N N/A Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound?

Y N N/A Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		17	SS > cal range		J dets /A (e)

Comments: See sample calculation verification worksheet for recalculations

LDC #: 21495 I29
SDG #: Su Cmw

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

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

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

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

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

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

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		17	SS, MMMM cal range		X / A (o)
		18	All except SS, MMMM dil		

Comments: _____

OVR.2S

LDC#: 21495I2 **VALIDATION FINDINGS WORKSHEET** Page: 1 of 1
SDG#: See cover **Field Duplicates** Reviewer: VG
2nd Reviewer:

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

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

Compound Name	Conc (ug/Kg)		RPD (≤ 50%)	Diff	Diff Limits	Quals (Parent Only)
	2	3				
2-Methylnaphthalene	40	35		5	≤87	
Benzo(a)anthracene	29	35		6	≤87	
Benzo(g,h,i)perylene	22	87U		65	≤87	
Chrysene	69	75		6	≤87	
Fluoranthene	61	61		0	≤87	
Hexachlorobenzene	2700	3100	14			
Naphthalene	14	18		4	≤87	
Phenanthrene	65	61		4	≤87	
Pyrene	170	140		30	≤87	
Octachlorostyrene	400	510	24			

Compound Name	Conc (ug/Kg)		RPD (≤ 50%)	Diff	Diff Limits	Quals (Parent Only)
	12	13				
Butyl benzylphthalate	260U	11		249	≤260	
Di-n-Butylphthalate	260U	82		178	≤260	
Dimethyl phthalate	260U	3.1		256.9	≤260	
Hexachlorobenzene	4.0	10U		6	≤10	

V:\FIELD DUPLICATES\21495I2.wpd

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 25 through July 7, 2009

LDC Report Date: September 25, 2009

Matrix: Water

Parameters: Semivolatiles

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903561

Sample Identification

M-75B
M-13AB
M-13009AB
M-64B
M-111AB
M-111ABRE
EB062909-GW1
M-25B
M-12AB
M-110B
M-110BRE
I-ARB
I-ARBRE

Introduction

This data review covers 13 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

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 V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.

J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.

J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.

U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.

R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.

UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.

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. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

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

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

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

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

All of the continuing calibration RRF values were greater than or equal to 0.05 .

V. Blanks

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

Sample EB062909-GW1 was identified as an equipment blank. No semivolatile contaminants were found in this blank with the following exceptions:

Equipment Blank ID	Sampling Date	Compound	Concentration	Associated Samples
EB062909-GW1	6/29/09	Diethylphthalate	0.22 ug/L	No associated samples in this SDG

VI. Surrogate Spikes

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

VII. 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.

VIII. Laboratory Control Samples (LCS)

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

LCS ID (Associated Samples)	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
90344LCS/D (M-75B M-13AB M-13009AB 90344MB)	Pyridine	30 (50-120)	28 (50-120)	-	J- (all detects) UJ (all non-detects)	P
90457LCS/D (M-64B M-111AB M-111ABRE EB062909-GW1 90457MB)	Pyridine	34 (50-120)	44 (50-120)	-	J- (all detects) UJ (all non-detects)	P

LCS ID (Associated Samples)	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
90703LCS/D (M-25B M-12AB 90703MB)	Pyridine	36 (50-120)	36 (50-120)	-	J- (all detects) UJ (all non-detects)	P
90766LCS/D (M-110B M-110BRE I-ARB I-ARBRE 90766MB)	Pyridine 1,4-Dioxane	26 (50-120) 47 (50-120)	25 (50-120) 48 (50-120)	- -	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

Sample	Internal Standards	Area (Limits)	Compound	Flag	A or P
M-111AB	Perylene-d12	823 (113164-452654)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A
M-110B	Perylene-d12	2769 (268630-1074518)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A
I-ARB	Perylene-d12	382 (276398-1105592)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A

Sample	Internal Standards	Area (Limits)	Compound	Flag	A or P
M-111ABRE	Perylene-d12	19920 (105262-421048)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A
M-110BRE	Perylene-d12	1046 (290058-1160230)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A
I-ARBRE	Perylene-d12	689 (290058-1160230)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903561	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment

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

Sample	Compound	Flag	A or P
M-111ABRE M-110BRE I-ARBRE	All TCL compounds	X	A

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

XVI. Field Duplicates

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

Compound	Concentration (ug/L)		RPD (Limits)	Difference (Limits)	Flags	A or P
	M-13AB	M-13009AB				
1,4-Dioxane	9.0	9.6	-	0.6 (≤1.9)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG R0903561

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903561	M-75B M-13AB M-13009AB M-64B M-111AB M-111ABRE EB062909-GW1 M-25B M-12AB	Pyridine	J- (all detects) UJ (all non-detects)	P	Laboratory control samples (%R) (l)
R0903561	M-110B M-110BRE I-ARB I-ARBRE	Pyridine 1,4-Dioxane	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	P	Laboratory control samples (%R) (l)
R0903561	M-111AB M-110B I-ARB M-111ABRE M-110BRE I-ARBRE	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A	Internal standards (area) (i)
R0903561	M-75B M-13AB M-13009AB M-64B M-111AB M-111ABRE EB062909-GW1 M-25B M-12AB M-110B M-110BRE I-ARB I-ARBRE	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
R0903561	M-111ABRE M-110BRE I-ARBRE	All TCL compounds	X	A	Overall assessment of data (o)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG R0903561

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles- Field Blank Data Qualification Summary - SDG R0903561

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21495J2a
SDG #: R0903561
Laboratory: Columbia Analytical Services

Date: 9/23/09
Page: 1 of 1
Reviewer: SW
2nd Reviewer: Q

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/25 – 7/01/09
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	% RSD r ✓
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 25%
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	N	client spec
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	SW	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	~~SW~~ N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	SW	
XVI.	Field duplicates	SW	D = 2, 3
XVII.	Field blanks	SW	EB = 7

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

Validated Samples: Water

1	1	M-75B	11	4	M-110B~~DL~~ RE	21	1	90341 MB	31
2	1	M-13AB D	12	4	I-ARB	22	2	90457	32
3	1	M-13009AB D	13	4	I-ARB~~DL~~ RE	23	3	90703	33
4	2	M-64B	14			24	4	90766	34
5	2	M-111AB	15			25			35
6	2	M-111ABRE	16			26			36
7	2	EB062909-GW1	17			27			37
8	3	M-25B	18			28			38
9	3	M-12AB	19			29			39
10	4	M-110B	20			30			40

7/07 + 7/31

VALIDATION FINDINGS WORKSHEET

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

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

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

LDC #: 21495J29
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: VV
2nd Reviewer: Q

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

Y N N/A Were field blanks identified in this SDG?
Y N N/A Were target compounds detected in the field blanks?

Blank units: ug/L **Associated sample units:** ug/L
Sampling date: 6/29/09
Field blank type: (circle one) Field Blank / Rinsate / Other: EB Associated Samples: 5 ~~6~~ None (6e)

Compound	Blank ID	Sample Identification								
	7	~~6~~								
1,1 LL	0.22	0.68/4								
CRQL										

Blank units: _____ **Associated sample units:** _____
Sampling date: _____
Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: _____

Compound	Blank ID	Sample Identification								
CRQL										

LDC #: 21495J2a
SDG #: See Cover
METHOD: GC/MS BNA (EPA SW 846 Method 8270C)

Reviewer: JVG
2nd Reviewer: [illegible]

VALIDATION FINDINGS WORKSHEET
Surrogate Recovery

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

(Y) N N/A Were percent recoveries (%R) for surrogates within QC limits?
(Y) N N/A If 2 or more base neutral or acid surrogates were outside QC limits, was a reanalysis performed to confirm %R?
(Y) N N/A If any %R was less than 10 percent, was a reanalysis performed to confirm %R?

#	Date	Sample ID	Surrogate	%R (Limits)	Qualifications
		6	FBP	899 (45-135)	No qual (only 1 out)
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

* QC limits are advisory

	QC Limits (Soil)	QC Limits (Water)
S1 (NBZ) = Nitrobenzene-d5	23-120	35-114
S2 (FBP) = 2-Fluorobiphenyl	30-115	43-116
S3 (TPH) = Terphenyl-d14	18-137	33-141
S4 (PHL) = Phenol-d5	24-113	10-94
S5 (2FP)= 2-Fluorophenol	25-121	21-100
S6 (TBP) = 2,4,6-Tribromophenol	19-122	10-123
S7 (2CP) = 2-Chlorophenol-d4	20-130*	33-110*
S8 (DCB) = 1,2-Dichlorobenzene-d4	20-130*	16-110*

LDC #: 21495 J2a
SDG #: Sy Cmy

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

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

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

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

Y N N/A Was a LCS required?

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		90344 LCS/D	RRR	30 (50-120)	28 (50-120)	( )	1-3, 90344 MB	J-/UJ/P (L)
			TTT	( )	43 ( )	( )		No qual (LCSD in)
				( )	( )	( )		
				( )	( )	( )		
		90457 LCS/D	RRR	34 ( )	41 ( )	( )	4-7, 90457 MB	J-/UJ/P (L)
			TTT	( )	48 ( )	( )		No qual (LCS in)
				( )	( )	( )		
				( )	( )	( )		
		90703 LCS/D	RRR	36 ( )	36 ( )	( )	8, 9 90703 MB	J-/UJ/P (L)
			TTT	47 ( )	( )	( )		No qual (LCSD in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
		90766 LCS/D	RRR	26 ( )	25 ( )	( )	10-13, 90766 MB	J-/UJ/P (L)
			TTT	47 ( )	48 ( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC #: 21995 J2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Internal Standards

Page: 1 of 1
Reviewer: JV6
2nd Reviewer: 9

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

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

Y N N/A Were all internal standard area counts within -50 to +100 of the associated calibration standard?

Y N N/A Were the retention times of the internal standards within +/- 30 seconds of the retention times of the associated calibration standard?

%R	#	Date	Sample ID	Internal Standard	Area (Limits)	RT (Limits)	Qualifications
0.4%			5	PRY	823 (113164 - 452654)		J/R/A (i)
0.5%			10		2769 (268630 - 1074518)		
0.07%			12		382 (276398 - 1105592)		
9.5%			6		19920 (105262 - 421048)		
0.2%			11		1046 (290058 - 1160230)		
0.1%			13		689		
							qual: (FFF, GGG, HHH, III, JJJ, KKK, LLL)

* QC limits are advisory

IS1 (DCB) = 1,4-Dichlorobenzene-d4
IS2 (NPT) = Naphthalene-d8
IS3 (ANT) = Acenaphthene-d10
IS4 (PHN) = Phenanthrene-d10
IS5 (CRY) = Chrysene-d12
IS6 (PRY) = Perylene-d12

LDC #: 21495 J2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

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

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

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

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

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

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		6, 11, 13	Confirmation runs (IS outside limits)		X/A (o)

Comments: _____

OVR.2S

LDC #: 21495J2a
SDG #: Sa Cruz

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

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

Y N N/A Were field duplicate pairs identified in this SDG?
Y N N/A Were target compounds identified in the field duplicate pairs?

Compound	Concentration (ug/L)		RPD
	2	3	
TTT	9.0	9.6	0.6 (≤ 1.9 Diff)

Compound	Concentration ( )		RPD

Compound	Concentration ( )		RPD

Compound	Concentration ( )		RPD

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 25, 2009

Matrix: Soil/Water

Parameters: Semivolatiles

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903584

Sample Identification

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

Introduction

This data review covers 26 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 8270C for Semivolatiles.

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 V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.

J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.

J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.

U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.

R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.

UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.

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. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

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

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

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

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

All of the continuing calibration RRF values were greater than or equal to 0.05 .

V. Blanks

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

Method Blank ID	Extraction Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
90350MB	6/29/09	Di-n-butylphthalate	33 ug/Kg	SA202-10B SA202-28B RSAI3-10B RSAI3-10BDL RSAI3-20B RSAI3-32B RSAI3-32BRE
90454MB	6/30/09	Di-n-butylphthalate	90 ug/Kg	SA188-0.5B SA172-0.5B SA41-0.5B SA44-0.5B SA42-0.5B RSAI2-10B RSAI2-10BDL RSAI2009-10B RSAI2009-10BDL RSAI2-20B RSAI2-31B RSAJ2-10B RSAJ2-20B RSAJ2-33B RSAJ2009-33B

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

Sample	Compound TIC (RT in minutes)	Reported Concentration	Modified Final Concentration
SA202-10B	Di-n-butylphthalate	43 ug/L	43U ug/Kg
SA172-0.5B	Di-n-butylphthalate	130 ug/Kg	130U ug/Kg
RSAI2-31B	Di-n-butylphthalate	56 ug/Kg	56U ug/Kg
RSAJ2-10B	Di-n-butylphthalate	95 ug/Kg	95U ug/Kg
RSAJ2-20B	Di-n-butylphthalate	50 ug/Kg	50U ug/Kg
RSAJ2-33B	Di-n-butylphthalate	86 ug/Kg	86U ug/Kg
RSAJ2009-33B	Di-n-butylphthalate	170 ug/Kg	170U ug/Kg

Sample EB062609-SO was identified as an equipment blank. No semivolatile contaminants were found in this blank with the following exceptions:

Equipment Blank ID	Sampling Date	Compound	Concentration	Associated Samples
EB062609-SO	6/26/09	Bis(2-ethylhexyl)phthalate 1,4-Dioxane	1.3 ug/L 0.15 ug/L	RSAI2-10B RSAI2-10BDL RSAI2009-10B RSAI2009-10BDL RSAI2-20B RSAI2-31B RSAJ2-10B RSAJ2-20B RSAJ2-33B RSAJ2009-33B

Sample FB072109-SO (from SDG R0904016) was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072109-SO	7/21/09	Bis(2-ethylhexyl)phthalate Butylbenzylphthalate Di-n-butylphthalate Diethylphthalate	1.4 ug/L 0.18 ug/L 1.5 ug/L 0.35 ug/L	SA202-10B SA202-28B RSAI3-10B RSAI3-10BDL RSAI3-20B RSAI3-32B RSAI3-32BRE RSAI2-10B RSAI2-10BDL RSAI2009-10B RSAI2009-10BDL RSAI2-20B RSAI2-31B RSAJ2-10B RSAJ2-20B RSAJ2-33B RSAJ2009-33B

Sample concentrations were compared to concentrations detected in the field blanks as required by the QAPP. No sample data was qualified.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for several samples. Since the samples were diluted out, no data were qualified.

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

Sample	Internal Standards	Area (Limits)	Compound	Flag	A or P
RSAI3-32B	Perylene-d12	100325 (113164-452654)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	A
RSAI3-32BRE	Perylene-d12	67341 (113164-452654)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	A

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All project quantitation limits were within validation criteria with the following exceptions:

Sample	Compound	Finding	Criteria	Flag	A or P
RSAI3-10B RSAI2-10B RSAI2009-10B	Hexachlorobenzene	Sample result exceeded calibration range.	Reported result should be within calibration range.	J (all detects)	A

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.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment

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
RSAI3-10B RSAI2-10B RSAI2009-10B	Hexachlorobenzene	X	A
RSAI3-10BDL RSAI2-10BDL RSAI2009-10BDL	All TCL compounds except Hexachlorobenzene	X	A
RSAI3-32BRE	All TCL compounds	X	A

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

XVI. Field Duplicates

Samples RSAI2-10B and RSAI2009-10B, samples RSAI2-10BDL and RSAI2009-10BDL, and samples RSAJ2-33B and RSAJ2009-33B were identified as field duplicates. No semivolatiles were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	RSAI2-10B	RSAI2009-10B				
Chrysene	10	11	-	1 (≤50)	-	-
Fluoranthene	50U	11	-	39 (≤50)	-	-
Hexachlorobenzene	6900	7100	3 (≤50)	-	-	-
Naphthalene	13	6.5	-	6.5 (≤50)	-	-
Pyrene	13	11	-	2 (≤50)	-	-
Octachlorostyrene	1200	1100	9 (≤50)	-	-	-

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	RSAI2-10BDL	RSAI2009-10BDL				
Hexachlorobenzene	5000	5400	8 (≤50)	-	-	-
Naphthalene	76	430U	-	354 (≤430)	-	-
Octachlorostyrene	1100	840	-	260 (≤500)	-	-

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	RSAJ2-33B	RSAJ2009-33B				
Di-n-butylphthalate	86	170	-	84 (≤300)	-	-
Naphthalene	1.7	1.8	-	0.1 (≤12)	-	-
Phenanthrene	3.4	12U	-	8.6 (≤12)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG R0903584

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0903584	RSAI3-32B RSAI3-32BRE	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	A	Internal standards (area) (i)
R0903584	RSAI3-10B RSAI2-10B RSAI2009-10B	Hexachlorobenzene	J (all detects)	A	Project Quantitation Limit (e)
R0903584	SA202-10B SA202-28B RSAI3-10B RSAI3-10BDL RSAI3-20B RSAI3-32B RSAI3-32BRE SA188-0.5B SA172-0.5B SA41-0.5B SA44-0.5B SA42-0.5B RSAI2-10B RSAI2-10BDL RSAI2009-10B RSAI2009-10BDL 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)
R0903584	RSAI3-10B RSAI2-10B RSAI2009-10B	Hexachlorobenzene	X	A	Overall assessment of data (o)
R0903584	RSAI3-10BDL RSAI2-10BDL RSAI2009-10BDL	All TCL compounds except Hexachlorobenzene	X	A	Overall assessment of data (o)
R0903584	RSAI3-32BRE	All TCL compounds	X	A	Overall assessment of data (o)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG R0903584

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P	Code
R0903584	SA202-10B	Di-n-butylphthalate	43U ug/Kg	A	bl
R0903584	SA172-0.5B	Di-n-butylphthalate	130U ug/Kg	A	bl
R0903584	RSAI2-31B	Di-n-butylphthalate	56U ug/Kg	A	bl
R0903584	RSAJ2-10B	Di-n-butylphthalate	95U ug/Kg	A	bl
R0903584	RSAJ2-20B	Di-n-butylphthalate	50U ug/Kg	A	bl
R0903584	RSAJ2-33B	Di-n-butylphthalate	86U ug/Kg	A	bl
R0903584	RSAJ2009-33B	Di-n-butylphthalate	170U ug/Kg	A	bl

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles- Field Blank Data Qualification Summary - SDG R0903584

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21495K2a
SDG #: R0903584
Laboratory: Columbia Analytical Services

Date: 9/21/09
Page: 1 of 1
Reviewer: JG
2nd Reviewer: CV

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/25 – 30/09
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	~~SW~~ A	%RSD r
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 25%
V.	Blanks	SW	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	SW	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	SW	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	SW	
XVI.	Field duplicates	SW	D_1 = 13, 15 D_2 = 14, 16 D_3 = 21, 22
XVII.	Field blanks	SW	EB = 23 FB = FB072109-SO from R0904016

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

Validated Samples: Soil + Water

1	1	SA202-10B	S	11	2	SA44-0.5B	S	21	2	RSAJ2-33B	D_3 S	31	1	90350 MB (7/6)
2	1	SA202-28B		12	2	SA42-0.5B		22	2	RSAJ2009-33B	D_3	32	1	90350 MB (7/21)
3	1	RSAI3-10B		13	2	RSAI2-10B	D_1	23	3	EB062609-SO	W	33	2	90454 MB
4	1	RSAI3-10BDL		14	2	RSAI2-10BDL	D_2	24	1	SA202-10BMS	S	34	3	90585 MB
5	1	RSAI3-20B		15	2	RSAI2009-10B	D_1	25	1	SA202-10BMSD		35		
6	1	RSAI3-32B		16	2	RSAI2009-10BDL	D_2	26	2	SA188-0.5BMS		36		
7	1	RSAI3-32BRE		17	2	RSAI2-20B		27	2	SA188-0.5BMSD		37		
8	2	SA188-0.5B		18	2	RSAI2-31B		28				38		
9	2	SA172-0.5B		19	2	RSAJ2-10B		29				39		
10	2	SA41-0.5B		20	2	RSAJ2-20B		30				40		

VALIDATION FINDINGS WORKSHEET

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

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

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

LDC #: 21495 K29
SDG #: Gu Creek

VALIDATION FINDINGS WORKSHEET
Blanks

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

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

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

Y N N/A Was a method blank analyzed for each matrix?
Y N N/A Was a method blank analyzed for each concentration preparation level?
Y N N/A Was a method blank associated with every sample?
Y N N/A Was the blank contaminated? If yes, please see qualification below.

Blank extraction date: 6/29/09 **Blank analysis date:** 7/02/09
Conc. units: ug/Kg Associated Samples: 1-7

Compound	Blank ID	Sample Identification								
	90350 MB	1								
165 XX	33	43/U								

Blank extraction date: 6/30/09 **Blank analysis date:** 9/02/09
Conc. units: ug/Kg Associated Samples: 8-22

Compound	Blank ID	Sample Identification								
	90454 MB	9	18	~~8~~ 19	20	21	22			
450 XX	90	130/U	56/U	95/U	50/U	86/U	170/U			

5x Phthalates
2x all others

LDC #: 21495K2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: JVC
2nd Reviewer: ___

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

Y N N/A Were field blanks identified in this SDG?
Y N N/A Were target compounds detected in the field blanks?

Blank units: ug/L **Associated sample units:** ug/kg
Sampling date: 7/21/09
Field blank type: (circle one) Field Blank / Rinsate / Other: ___ Associated Samples: 1-7, 13-22

	Compound	Blank ID	Sample Identification								
(5x)		FB072109-SO b									
7.0	EEE	1.4		(All results either ND or > FB)							
0.9	AAA	0.18									
7.5	XX	1.5									
1.75	LL	0.35									
	CRQL										

Blank units: ug/L **Associated sample units:** ug/kg
Sampling date: 7/20/09
Field blank type: (circle one) Field Blank / Rinsate / Other: EB Associated Samples: WW 13-22 (ND)

Compound	Blank ID	Sample Identification								
	23									
EEE	1.3									
TTT	0.15									
CRQL										

5x Phthalates
2x all others

LDC #: 21495k2k
SDG #: Su Cmel

VALIDATION FINDINGS WORKSHEET
Surrogate Recovery

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

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

(Y) N N/A Were percent recoveries (%R) for surrogates within QC limits?

(Y) N N/A If 2 or more base neutral or acid surrogates were outside QC limits, was a reanalysis performed to confirm %R?

(Y) N N/A If any %R was less than 10 percent, was a reanalysis performed to confirm %R?

#	Date	Sample ID	Surrogate	%R (Limits)	Qualifications
		3 (20x)	All	0 (45-135)	No qual
		4 (100)		( )	
		11 (20x)		( )	
		14 (70x)		( )	
		16 (60x)		( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

* QC limits are advisory	QC Limits (Soil)	QC Limits (Water)
S1 (NBZ) = Nitrobenzene-d5	23-120	35-114
S2 (FBP) = 2-Fluorobiphenyl	30-115	43-116
S3 (TPH) = Terphenyl-d14	18-137	33-141
S4 (PHL) = Phenol-d5	24-113	10-94
S5 (2FP)= 2-Fluorophenol	25-121	21-100
S6 (TBP) = 2,4,6-Tribromophenol	19-122	10-123
S7 (2CP) = 2-Chlorophenol-d4	20-130*	33-110*
S8 (DCB) = 1,2-Dichlorobenzene-d4	20-130*	16-110*

LDC #: 21495 K2a
SDG #: Sea Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: JV6
2nd Reviewer: A

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

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

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

Y N N/A Was a MS/MSD analyzed every 20 samples of each matrix?

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		26/27	W	( )	109 (35-108)	( )	8	No qual (MS in)
			YY	( )	194 (11-188)	( )	↓	↓ ↓
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

	Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)		Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)
A.	Phenol	26-90%	≤ 35%	12-110%	≤ 42%	GG	Acenaphthene	31-137%	≤ 19%	46-118%	≤ 31%
C.	2-Chlorophenol	25-102%	≤ 50%	27-123%	≤ 40%	II.	4-Nitrophenol	11-114%	≤ 50%	10-80%	≤ 50%
E.	1,4-Dichlorobenzene	28-104%	≤ 27%	36-97%	≤ 28%	KK.	2,4-Dinitrotoluene	28-89%	≤ 47%	24-96%	≤ 38%
J.	N-Nitroso-di-n-propylamine	41-126%	≤ 38%	41-116%	≤ 38%	TT.	Pentachlorophenol	17-109%	≤ 47%	9-103%	≤ 50%
R.	1,2,4-Trichlorobenzene	38-107%	≤ 23%	39-98%	≤ 28%	ZZ.	Pyrene	35-142%	≤ 36%	26-127%	≤ 31%
V.	4-Chloro-3-methylphenol	26-103%	≤ 33%	23-97%	≤ 42%						

LDC #: 21495 K2a
SDG #: Fu Cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

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

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

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

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		90454 LCS/D	ZZ	124 (50-120)	126 (50-120)	( )	8-22, 90454 MB	No qual (MS/MSD)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
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				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC #: 21495k2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Internal Standards

Reviewer: SVG
2nd Reviewer: Q

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

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

(X) N N/A Were all internal standard area counts within -50 to +100 of the associated calibration standard?

(Y) N N/A Were the retention times of the internal standards within +/- 30 seconds of the retention times of the associated calibration standard?

#	Date	Sample ID	Internal Standard	Area (Limits)	RT (Limits)	Qualifications
		6	PRY	100325 (113164 - 452654)		J/UJ/A (i)
(39 RR)		7		67341		
						qual: (FFF, GGG, HHH, III, JJJ, KKK, LLL)

* QC limits are advisory

IS1 (DCB) = 1,4-Dichlorobenzene-d4
IS2 (NPT) = Naphthalene-d8
IS3 (ANT) = Acenaphthene-d10
IS4 (PHN) = Phenanthrene-d10
IS5 (CRY) = Chrysene-d12
IS6 (PRY) = Perylene-d12

LDC #: 21495 K2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

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

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

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

Y N (N/A) Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound?

Y N ~~N/A~~ Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		3, 13, 15	SS > cal range		J dets /A (e)

Comments: See sample calculation verification worksheet for recalculations

LDC #: 21495 k24
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

Reviewer: JVG
2nd Reviewer: Q

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

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

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

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

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		3, 13, 15	SS > Cal range		X / A (o)
		4, 14, 16	All except SS dil		
		7 (All TCL)	Confirmation run for #6 (IS outside limits)		

Comments: _____

OVR.2S

LDC #: 21495K2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Page: 1 of 1
Reviewer: JVP
2nd reviewer:

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

Y N N/A Were field duplicate pairs identified in this SDG?
Y N N/A Were target compounds identified in the field duplicate pairs?

Compound	Concentration (ug/kg) 13	15	RPD (Parent only)
DDD	10	11	1 (≤ 50 Diff)
YY	50U	11	39
SS	6900	7100	3 (≤ 50 2 RPD)
S	13	6.5	6.5 (≤ 50 Diff)
ZZ	13	11	2
UUU	1200	1100	9 (≤ 50 2 RPD)

Compound	Concentration (ug/kg) 14	16	RPD (Parent only)
SS	5000	5400	8 (≤ 50 2 RPD)
S	76	430 U	354 (≤ 430 Diff)
UUU	1100	840	260 (≤ 500 Diff)

Compound	Concentration (ug/kg) 21	22	RPD (Parent only)
XX	86	170	84 (≤ 300 Diff)
S	1.7	1.8	0.1 (≤ 12 Diff)
UU	3.4	12U	8.6

Compound	Concentration ( )		RPD

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 25, 2009

Matrix: Soil

Parameters: Semivolatiles

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
SA69-10BMS
SA69-10BMSD

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 8270C for Semivolatiles.

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 V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.

J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.

J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.

U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.

R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.

UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.

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. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

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

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

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

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

All of the continuing calibration RRF values were greater than or equal to 0.05 .

V. Blanks

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

Method Blank ID	Extraction Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
91016MB	7/9/09	Di-n-butylphthalate	38 ug/Kg	RSAL4-0.5B RSAL4009-0.5B RSAL4-10B RSAL4-28B SA100-10B SA100-30B SA69-0.5B SA69-10B SA69-29B

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

Sample	Compound TIC (RT in minutes)	Reported Concentration	Modified Final Concentration
RSAL4-0.5B	Di-n-butylphthalate	39 ug/L	39U ug/L
RSAL4009-0.5B	Di-n-butylphthalate	42 ug/Kg	42U ug/Kg
RSAL4-28B	Di-n-butylphthalate	67 ug/Kg	67U ug/Kg
SA100-10B	Di-n-butylphthalate	63 ug/Kg	63U ug/Kg
SA100-30B	Di-n-butylphthalate	56 ug/Kg	56U ug/Kg

Sample FB072109-SO (from SDG R0904016) was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072109-SO	7/21/09	Bis(2-ethylhexyl)phthalate Butylbenzylphthalate Di-n-butylphthalate Diethylphthalate	1.4 ug/L 0.18 ug/L 1.5 ug/L 0.35 ug/L	All samples in SDG R0903729

Sample concentrations were compared to concentrations detected in the field blanks as required by the QAPP. No sample data was qualified.

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. 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.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment

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

XVI. Field Duplicates

Samples RSAL4-0.5B and RSAL4009-0.5B were identified as field duplicates. No semivolatiles were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	RSAL4-0.5B	RSAL4009-0.5B				
Chrysene	1.0	1.1	-	0.1 (≤6.9)	-	-
Di-n-butylphthalate	39	42	-	3 (≤180)	-	-
Fluoranthene	1.7	1.8	-	0.1 (≤6.9)	-	-
Hexachlorobenzene	87	86	1 (≤50)	-	-	-
Naphthalene	1.4	1.4	-	0 (≤6.9)	-	-
Phenanthrene	2.1	2.5	-	0.4 (≤6.9)	-	-
Pyrene	1.4	1.1	-	0.3 (≤6.9)	-	-
Octachlorostyrene	14	13	-	1 (≤6.9)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG R0903729

SDG	Sample	Compound	Flag	A or P	Reason (Code)
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
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG R0903729

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P	Code
R0903729	RSAL4-0.5B	Di-n-butylphthalate	39U ug/L	A	bl
R0903729	RSAL4009-0.5B	Di-n-butylphthalate	42U ug/Kg	A	bl
R0903729	RSAL4-28B	Di-n-butylphthalate	67U ug/Kg	A	bl
R0903729	SA100-10B	Di-n-butylphthalate	63U ug/Kg	A	bl
R0903729	SA100-30B	Di-n-butylphthalate	56U ug/Kg	A	bl

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Semivolatiles- Field Blank Data Qualification Summary - SDG R0903729

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21495L2a
SDG #: R0903729
Laboratory: Columbia Analytical Services

Date: 9/23/09
Page: 1 of 1
Reviewer: JVL
2nd Reviewer:

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 7/06 - 07/09
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	2 RSD ✓
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 25 %
V.	Blanks	SW	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	SW	D = 8, 9
XVII.	Field blanks	SW	FB = FB072109-SO from R0904016

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	90956 MB	31	
2	SA206-10B	12	SA100-10B	22	90916	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 b	18	SA206-30BMSD	28		38	
9	RSAL4009-0.5B b	19	SA69-10BMS	29		39	
10	RSAL4-10B	20	SA69-10BMSD	30		40	

VALIDATION FINDINGS WORKSHEET

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

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

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

COMPNDL

LDC #: 21495L2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Blanks

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

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

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

Y N N/A Was a method blank analyzed for each matrix?
Y N N/A Was a method blank analyzed for each concentration preparation level?
Y N N/A Was a method blank associated with every sample?
Y N N/A Was the blank contaminated? If yes, please see qualification below.

Blank extraction date: 7/09/09 **Blank analysis date:** 7/15/09
Conc. units: ug/kg Associated Samples: 8 - 16 (61)

Compound	Blank ID	Sample Identification								
	91016 MB	8	9	11	12	13				
XX	38	39/U	42/U	67/U	63/U	56/U				

196

Blank extraction date: _____ **Blank analysis date:** _____
Conc. units: _____ Associated Samples: _____

Compound	Blank ID	Sample Identification								

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
Common contaminants such as the phthalates and TICs noted above that were detected in samples within ten times the associated method blank concentration were qualified as not detected, "U". Other contaminants within five times the method blank concentration were also qualified as not detected, "U".

LDC #: 21495 L29
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

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

Y N N/A Were field blanks identified in this SDG?
Y N N/A Were target compounds detected in the field blanks?

Blank units: ug/L **Associated sample units:** ug/Kg
Sampling date: 7/21/09
Field blank type: (circle one) Field Blank / Rinsate / Other:_____ Associated Samples: All

Compound	Blank ID	Sample Identification								
	FB072109-50									
EEE	1.4		(All results either ND or > FB)							
AAA	0.18									
XX	1.5									
LL	0.35									
CRQL										

(5X)
7.0
0.9
7.5
1.75

Blank units:_____ **Associated sample units:**_____
Sampling date:_____
Field blank type: (circle one) Field Blank / Rinsate / Other:_____ Associated Samples:_____

Compound	Blank ID	Sample Identification								
CRQL										

LDC #: 24495L2a
SDG #: Su Canon

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

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

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

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

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

Y N N/A Was a MS/MSD analyzed every 20 samples of each matrix?

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		17/18	FEE	153 (50-150)	( )	34 (30)	4	No qual (MSD in)
				( )	( )	( )		
				( )	( )	( )		
		19/20	RRR	49 (50-150)	( )	( )	15	
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

	Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)		Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)
A.	Phenol	26-90%	≤ 35%	12-110%	≤ 42%	GG	Acenaphthene	31-137%	≤ 19%	46-118%	≤ 31%
C.	2-Chlorophenol	25-102%	< 50%	27-123%	< 40%	II.	4-Nitrophenol	11-114%	< 50%	10-80%	< 50%
E.	1,4-Dichlorobenzene	28-104%	< 27%	36-97%	< 28%	KK.	2,4-Dinitrotoluene	28-89%	< 47%	24-96%	< 38%
J.	N-Nitroso-di-n-propylamine	41-126%	< 38%	41-116%	< 38%	TT.	Pentachlorophenol	17-109%	< 47%	9-103%	< 50%
R.	1,2,4-Trichlorobenzene	38-107%	< 23%	39-98%	< 28%	ZZ.	Pyrene	35-142%	< 36%	26-127%	< 31%
V.	4-Chloro-3-methylphenol	26-103%	< 33%	23-97%	< 42%						

LDC #: 21495L2a
SDG #: See Cover

Reviewer: JVG
2nd Reviewer: Q

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

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

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

Y N N/A (Y circled) Was a LCS required?

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		90956 LCS/D	EEE	127 (50-120)	147 (50-120)	( )	1-7, 90956 MB	No qual (MSD in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
		91016 LCS/D	EEE	137 (50-120)	131 (50-120)	( )	8-16, 91016 MB	No qual (MS/MSD in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
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				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC#: 21495L2
SDG#:See cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Page: 1 of 1
Reviewer: JV6
2nd Reviewer: [illegible]

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

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

Compound Name	Conc (ug/Kg)		RPD (≤ 50%)	Diff	Diff Limits	Quals (Parent Only)
	8	9				
Chrysene	1.0	1.1		0.1	≤6.9	
Di-n-butylphthalate	39	42		3	≤180	
Fluoranthene	1.7	1.8		0.1	≤6.9	
Hexachlorobenzene	87	86	1			
Naphthalene	1.4	1.4		0	≤6.9	
Phenanthrene	2.1	2.5		0.4	≤6.9	
Pyrene	1.4	1.1		0.3	≤6.9	
Octachlorostyrene	14	13		1	≤6.9	

V:\FIELD DUPLICATES\21495L2.wpd