

**LABORATORY DATA CONSULTANTS, INC.**

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

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

January 11, 2010

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

Dear Ms. Arnold,

Enclosed are the revised data validation reports for the fractions listed below. Please replace the previously submitted reports & associated CD with the enclosed revised reports and CD.

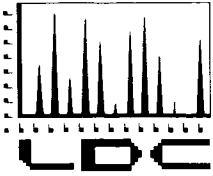
**LDC Project # 21991:**

<b><u>SDG #</u></b>	<b><u>Fraction</u></b>
R0905177, R0905218, R0905260	Wet Chemistry
R0905192	Volatiles
R0905464, K0908207	Metals

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

Sincerely,

Erlinda T. Rauto  
Operations Manager/Senior Chemist



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Northgate Environmental Management, Inc.  
1100 Quail Street Ste. 102  
Newport Beach, CA 92660  
ATTN: Ms. Cindy Arnold

December 15, 2009

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

Dear Ms. Arnold,

Enclosed are the final validation reports for the fraction listed below. These SDGs were received on November 10, 2009. Attachment 1 is a summary of the samples that were reviewed for each analysis.

**LDC Project # 21991:**

<b><u>SDG #</u></b>	<b><u>Fraction</u></b>
R0904290, R0905115, R0905072, R0905177, R0905138, R0905192, R0905198, R0905218, R0905260, R0905331, R0905348, R0905387, R0905462, R0905464, K0908207, K0908748	Volatiles, Semivolatiles, Chlorinated Pesticides, Polychlorinated Biphenyls, Metals, Wet Chemistry, Gasoline Range Organics, TPH as Extractables, Formaldehyde

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

- Standard Operating Procedures (SOP) 40, Data Review/Validation, BRC 2009
- Quality Assurance Project Plan Tronox LLC Facility, Henderson Nevada, June 2009
- NDEP Guidance, May 2006
- USEPA, Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review, June 2008
- USEPA, Contract Laboratory Program National Functional Guidelines for Inorganic Data Review, October 2004

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

Sincerely,

Erlinda T. Rauto  
Operations Manager/Senior Chemist

LDC #21991 (Tronox LLC-Northgate, Henderson NV / Tronox Phase B 2009)

LDC	SDG#	DATE REC'D	(3) DATE DUE	VOA (8260B)		SVOA (8270C)		Pest. (8081A)		PCBs (8082)		Metals (SW846) (8015B)		GRO (8015B)		TPH-E (8015B)		Formaldehyde (8315A)		Alk. (2320B)		NH <sub>3</sub> -N (350.1M)		Br Cl <sub>2</sub> SO <sub>4</sub> (9056)		NO <sub>2</sub> -N (9056)		NO <sub>2</sub> -N (353.2)		CN- (9012)		Cond. (120.1)		Cr(VI) (218.6/7199)					
				W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S
Matrix: Water/Soil																																							
A	R0904290	11/10/09	12/14/09	8	0	4	0	4	0	1	0	5	0	1	0	1	0	1	0	1	0	4	0	4	0	4	0	4	0	4	0	4	0	4	0	3	0	4	0
B	R0905115	11/10/09	12/14/09	4	16	1	12	-	-	0	2	-	-	1	4	1	16	-	-	1	16	1	16	1	16	1	16	1	16	1	16	1	16	1	12	-	-	1	16
C	R0905072	11/10/09	12/14/09	5	21	1	21	1	19	-	-	-	-	0	6	1	17	-	-	1	21	1	21	1	21	1	21	1	21	1	21	1	21	1	21	-	-	1	21
D	R0905177	11/10/09	12/14/09	6	19	2	18	-	-	-	-	-	-	1	5	2	15	-	-	2	18	2	18	2	18	2	18	2	18	2	18	2	18	2	18	-	-	2	18
E	R0905138	11/10/09	12/14/09	5	21	0	20	0	1	0	1	-	-	-	0	20	-	-	0	24	0	24	0	24	0	24	0	24	0	24	0	24	0	24	0	24	0	24	0
F	R0905192	11/10/09	12/14/09	0	5	0	10	-	-	-	-	-	-	0	4	0	10	-	-	0	10	0	10	0	10	0	10	0	10	0	10	0	10	0	10	0	10	0	10
G	R0905198	11/10/09	12/14/09	2	15	0	15	0	5	-	-	-	-	0	2	0	13	-	-	0	15	0	15	0	15	0	15	0	15	0	15	0	15	0	15	0	15	0	15
H	R0905218	11/10/09	12/14/09	4	18	1	14	0	7	-	-	1	17	-	-	1	17	-	-	1	17	1	17	1	17	1	17	1	17	1	17	1	17	1	17	1	17	1	17
I	R0905260	11/10/09	12/14/09	6	19	2	19	0	7	0	3	2	19	1	3	2	17	-	-	2	19	2	19	2	19	2	19	2	19	2	19	2	19	2	19	2	19	2	19
J	R0905331	11/10/09	12/14/09	2	12	0	12	0	3	0	3	-	-	0	4	0	12	-	-	0	12	0	12	0	12	0	12	0	12	0	12	0	12	0	12	0	12	0	12
K	R0905348	11/10/09	12/14/09	3	10	1	9	0	4	-	-	1	9	-	-	0	4	-	-	1	9	1	9	1	9	1	9	1	9	1	9	1	9	1	9	1	9	1	9
L	R0905387	11/10/09	12/14/09	2	19	0	16	0	13	0	5	0	16	0	7	0	16	-	-	0	16	0	16	0	16	0	16	0	16	0	16	0	16	0	16	0	16	0	16
M	R0905462	11/10/09	12/14/09	-	-	-	-	-	-	-	-	4	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N	R0905464	11/10/09	12/14/09	6	21	2	20	1	22	0	2	2	20	-	-	2	20	-	-	2	20	2	20	2	20	2	20	2	20	2	20	2	20	2	20	2	20	2	20
O	K0908207	11/10/09	12/14/09	-	-	-	-	-	-	-	-	0	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
P	K0908748	11/10/09	12/14/09	-	-	-	-	-	-	-	-	0	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Total	T/LR			51	199	14	186	6	84	1	19	15	93	4	35	10	177	1	0	14	197	14	197	14	197	14	199	14	197	14	197	13	166	3	10	14	197	0	2355