

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Data Validation Reports
LDC #21991**

Gasoline Range Organics

LDC

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

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

Collection Date: August 4, 2009

LDC Report Date: December 18, 2009

Matrix: Water

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0904290

Sample Identification

FB080409-GW

Introduction

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

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

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

Sample FB080409-GW was identified as a field blank. No gasoline range organic contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB080409-GW	8/4/09	Gasoline range organics	10 ug/L	No associated samples in this SDG

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0904290	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Data Qualification Summary - SDG R0904290**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0904290	FB080409-GW	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0904290**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0904290**

No Sample Data Qualified in this SDG

**VALIDATION FINDINGS WORKSHEET
Field Blanks**

Page: 1 of 1
Reviewer: JLG
2nd Reviewer: [Signature]

LDC #: 21991A7
SDG #: See Cover

METHOD: GC HPLC
 N/A N/A Were field blanks identified in this SDG?
 N/A N/A Were target compounds detected in the field blanks?
 Blank units: ug/L Associated sample units: NA
 Sampling date: 8/04/09
 Field blank type: (circle one) Field Blank / Trip Blank / Atmospheric Blank / Ambient Blank / Rinsate / Equipment Rinsate / Equipment Blank / Source Blank / Other: None

Compound	Blank ID	Blank ID	Blank ID	Sample Identification	Associated Samples
GR0		6			
CRQL					

Blank units: _____ Associated sample units: _____
 Sampling date: _____ Associated Samples: _____
 Field blank type: (circle one) Field Blank / Trip Blank/ Atmospheric Blank/ Ambient Blank
 Rinsate / Equipment Rinsate / Equipment Blank / Source Blank / Other: _____

Compound	Blank ID	Blank ID	Blank ID	Sample Identification	Associated Samples
CRQL					

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
 Samples with compound concentrations within five times the associated field blank concentration are listed above, these sample results were qualified as not detected, "U".

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: September 8, 2009

LDC Report Date: December 1, 2009

Matrix: Soil/Water

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905115

Sample Identification

EB090809-SO1
SA50-12B
SA50009-12B
SA50-25B
SA50-36B
SA50-12BMS
SA50-12BMSD

Introduction

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

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
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- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

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

Sample EB090809-SO1 was identified as an equipment blank. No gasoline range organic contaminants were found in this blank.

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No gasoline range organic contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	Gasoline range organics	27 ug/L	All soil samples in SDG R0905115

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

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905115	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples SA50-12B and SA50009-12B were identified as field duplicates. No gasoline range organics were detected in any of the samples.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Data Qualification Summary - SDG R0905115**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905115	EB090809-SO1 SA50-12B SA50009-12B SA50-25B SA50-36B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0905115**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Equipment Blank Data Qualification Summary - SDG R0905115**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0905115**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21991B7

VALIDATION COMPLETENESS WORKSHEET

Date: 11/30/09

SDG #: R0905115

Stage 2B

Page: 1 of 1

Laboratory: Columbia Analytical Services

Reviewer: SVL
2nd Reviewer: [Signature]

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 9/08/09
IIa.	Initial calibration	A	
IIb.	Calibration verification/LCV	A	CV = 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	US
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D = 2, 3
X.	Field blanks	SW	*EB = 1 FB = FB072909-SO (from R0909286)

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

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

D = Duplicate
TB = Trip blank
EB = Equipment blank

Validated Samples: water + soil

1	EB090809-SO1	W	11	169728-WMB	21	31
2	SA50-12B	D	12	-SMB	22	32
3	SA50009-12B	D	13		23	33
4	SA50-25B		14		24	34
5	SA50-36B		15		25	35
6	SA50-12BMS		16		26	36
7	SA50-12BMSD		17		27	37
8			18		28	38
9			19		29	39
10			20		30	40

Notes: _____

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: September 3, 2009

LDC Report Date: December 1, 2009

Matrix: Soil

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905072

Sample Identification

SA53-10B
SA53-25B
SA53-32B
SA106-12B
SA106-20B
SA106-35B

Introduction

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

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

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

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No gasoline range organic contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	Gasoline range organics	27 ug/L	All samples in SDG R0905072

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

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905072	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Data Qualification Summary - SDG R0905072**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905072	SA53-10B SA53-25B SA53-32B SA106-12B SA106-20B SA106-35B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0905072**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0905072**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21991C7

VALIDATION COMPLETENESS WORKSHEET

Date: 11/30/09

SDG #: R0905072

Stage 2B

Page: 1 of 1

Laboratory: Columbia Analytical Services

Reviewer: JG

2nd Reviewer: CL

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: <u>9/03/09</u>
IIa.	Initial calibration	A	
IIb.	Calibration verification/ ICV	A	<u>CCV ≤ 20%</u>
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	<u>Client Spec</u>
IVc.	Laboratory control samples	A	<u>LCS</u>
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	SW	<u>FB = FB072909-S0 (from R0904226)</u>

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

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

D = Duplicate
 TB = Trip blank
 EB = Equipment blank

Validated Samples: Soil

1	SA53-10B	11	<u>16 9571 - MB</u>	21	31
2	SA53-25B	12		22	32
3	SA53-32B	13		23	33
4	SA106-12B	14		24	34
5	SA106-20B	15		25	35
6	SA106-35B	16		26	36
7		17		27	37
8		18		28	38
9		19		29	39
10		20		30	40

Notes: _____

VALIDATION FINDINGS WORKSHEET

Field Blanks

DC #: 21991C7 Page: 1 of 1
 SDG #: See Cont Reviewer: DYC
 2nd Reviewer:

METHOD: GC / HPLC
 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: 7/29/09
 Field blank type: (circle one) Field Blank Trip Blank / Atmospheric Blank / Ambient Blank
 Rinsate / Equipment Rinsate / Equipment Blank / Source Blank / Other:

Associated Samples: A11 (ND)

Compound	Blank ID	Blank ID	Sample Identification
GCRO		<u>F072901-50</u>	
	<u>27</u>		
CRQL			

Blank units: _____ Associated sample units: _____
 Sampling date: _____
 Field blank type: (circle one) Field Blank / Trip Blank / Atmospheric Blank / Ambient Blank
 Rinsate / Equipment Rinsate / Equipment Blank / Source Blank / Other:

Associated Samples: _____

Compound	Blank ID	Blank ID	Sample Identification
CRQL			

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
 Samples with compound concentrations within five times the associated field blank concentration are listed above, these sample results were qualified as not detected, "U".

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: September 10, 2009

LDC Report Date: December 1, 2009

Matrix: Soil/Water

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905177

Sample Identification

EB091009-SO1
SA102-10B
SA102-30B
SA109-10B
SA109-25B
SA109-34B
SA109-10BMS
SA109-10BMSD

Introduction

This data review covers 7 soil samples and one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Gasoline Range Organics.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) as there are no current guidelines for the method stated above.

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- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

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

Sample EB091009-SO1 was identified as an equipment blank. No gasoline range organic contaminants were found in this blank with the following exceptions:

Equipment Blank ID	Sampling Date	Compound	Concentration	Associated Samples
EB091009-SO1	9/10/09	Gasoline range organics	18 ug/L	All soil samples in SDG R0905177

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

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No gasoline range organic contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	Gasoline range organics	27 ug/L	All soil samples in SDG R0905177

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

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905177	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Data Qualification Summary - SDG R0905177**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905177	EB091009-SO1 SA102-10B SA102-30B SA109-10B SA109-25B SA109-34B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0905177**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Equipment Blank Data Qualification Summary - SDG R0905177**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0905177**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21991D7

VALIDATION COMPLETENESS WORKSHEET

SDG #: R0905177

Stage 2B

Laboratory: Columbia Analytical Services

Date: 11/30/09

Page: 1 of 1

Reviewer: JVG

2nd Reviewer: [Signature]

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 9/10/09
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	A	COV ≤ 20 %
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	SW	EB = 1 FB = FB072909-S0 (from R0904226)

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

Validated Samples: Water + Soil

1	EB091009-SO1	W	11	170704-WMB	21	31
2	SA102-10B	S	12	↓ -SMB	22	32
3	SA102-30B		13		23	33
4	SA109-10B		14		24	34
5	SA109-25B		15		25	35
6	SA109-34B		16		26	36
7	SA109-10BMS		17		27	37
8	SA109-10BMSD	✓	18		28	38
9			19		29	39
10			20		30	40

Notes: _____

LDC #: 21991 D7
SDG #: See cover

VALIDATION FINDINGS WORKSHEET

Field Blanks

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

METHOD: GC HPLC

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: 5/10/09

Field blank type: (circle one) Field Blank / Trip Blank / Atmospheric Blank / Ambient Blank

Field Blank / Equipment Rinsate / Source Blank / Other:

Associated Samples: All Soils (ND)

Compound	Blank ID	Blank ID	Sample Identification
GR0	18		
CRQL			

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

Sampling date: 7/29/09

Field blank type: (circle one) Field Blank Trip Blank / Atmospheric Blank / Ambient Blank

Field Blank / Equipment Rinsate / Source Blank / Other:

Associated Samples: All Soils (ND)

Compound	Blank ID	Blank ID	Sample Identification
		FB072909-S0	
GR0	27		
CRQL			

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
Samples with compound concentrations within five times the associated field blank concentration are listed above, these sample results were qualified as not detected, "U".

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: September 10 through September 16, 2009

LDC Report Date: December 5, 2009

Matrix: Soil

Parameters: Gasoline Range Organics

Validation Level: Stage 4

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905192

Sample Identification

SA102-10BSPLP3
SA102-30BSPLP3
SA128-10BSPLP3
SA128-29BSPLP3

Samples in this SDG underwent SPLP extraction

Introduction

This data review covers 4 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Gasoline Range Organics.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

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

Method Blank ID	Extraction Date	Compound	Concentration	Associated Samples
SPLP-Bik1	9/17/09	Gasoline range organics	27 ug/L	SA102-10BSPLP3 SA102-30BSPLP3
SPLP-Bik2	9/24/09	Gasoline range organics	7.3 ug/L	SA128-10BSPLP3 SA128-29BSPLP3

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	Reported Concentration	Modified Final Concentration
SA102-10BSPLP3	Gasoline range organics	8.3 ug/L	8.3U ug/L
SA128-10BSPLP3	Gasoline range organics	6.5 ug/L	6.5U ug/L

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

All target compound identifications were within validation criteria.

VI. 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 R0905192	All compounds reported below the PQL.	J (all detects)	A

VII. System Performance

The system performance was acceptable.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Data Qualification Summary - SDG R0905192**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905192	SA102-10BSPLP3 SA102-30BSPLP3 SA128-10BSPLP3 SA128-29BSPLP3	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0905192**

SDG	Sample	Compound	Modified Final Concentration	A or P	Code
R0905192	SA102-10BSPLP3	Gasoline range organics	8.3U ug/L	A	bl
R0905192	SA128-10BSPLP3	Gasoline range organics	6.5U ug/L	A	bl

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0905192**

No Sample Data Qualified in this SDG

LDC #: 21991F7

Tronox Northgate Henderson VALIDATION COMPLETENESS WORKSHEET

Date: 11/20/09

SDG #: R0905192

Stage 4

Page: 1 of 1

Laboratory: Columbia Analytical Services

Reviewer: JV

2nd Reviewer: [Signature]

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

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

Validation Area			Comments
I.	Technical holding times	A	Sampling dates: 9/10/09 - 9/16/09
IIa.	Initial calibration	A	
IIb.	Calibration verification/ LCV	A	CCV ≤ 20%
III.	Blanks	SW	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	Client Spec
IVc.	Laboratory control samples	A	US/D
V.	Target compound identification	A	
VI.	Compound Quantitation and CRQLs	A	
VII.	System Performance	A	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	N	

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

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

D = Duplicate
TB = Trip blank
EB = Equipment blank

Validated Samples:

Soil

1	SA102-10BSPLP3	11	171343 - MB	21		31	
2	SA102-30BSPLP3	12	172813 - ↓	22		32	
3	SA128-10BSPLP3	13	SPLP - BIK1	23		33	
4	SA128-29BSPLP3	14	SPLP - BIK2	24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

DC #: 21991 F7
 DG #: See Cover

VALIDATION FINDINGS CHECKLIST

Page: 1 of 2
 Reviewer: JV
 2nd Reviewer: [Signature]

Method: GC HPLC

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

DC #: 2991F7
 DG #: See Cover

VALIDATION FINDINGS CHECKLIST

Page: 2 of 2
 Reviewer: JVG
 2nd Reviewer: W

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

LDC #: 219917
SDG #: See Cont

VALIDATION FINDINGS WORKSHEET
Blanks

Page: 1 of 1
Reviewer: JG
2nd Reviewer: L

METHOD: GC HPLC

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

- Y N N/A Were all samples associated with a given method blank?
- Y N N/A Was a method blank performed for each matrix and whenever a sample extraction procedure was performed?
- Y N N/A Was a method blank performed with each extraction batch?
- Y N N/A Were any contaminants found in the method blanks? If yes, please see findings below.

Level IV/D Only

- Y N N/A (Gasoline and aromatics only) Was a method blank analyzed with each 24 hour batch?
- Y N N/A Was a method blank analyzed for each analytical / extraction batch of ≤ 20 samples?

Blank extraction date: 4/17/09 Blank analysis date: 9/22/09
Conc. units: ug/L Associated samples: 1, 2 (bl)

Compound	Blank ID	Sample Identification
GR0	SPLP-BK1 27	1 8.2/11

Blank extraction date: 9/24/09 Blank analysis date: 9/30/09
Conc. units: ug/L Associated samples: 3, 4 (bl)

Compound	Blank ID	Sample Identification
GR0	SPLP-BK2 7.3	3 6.5/11 <u>16</u>

ALL CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
All contaminants within five times the method blank concentration were qualified as not detected. "U".

LDC #: 2191 F
 SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Page: 1 of 1
 Reviewer: DVC
 2nd Reviewer:

METHOD: GC HPLC

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

- CF = A/C
- average CF = sum of the CF/number of standards
- %RSD = $100 \cdot (S/X)$
- A = Area of compound,
- C = Concentration of compound,
- S = Standard deviation of the CF
- X = Mean of the CFs

#	Standard ID	Calibration Date	Compound	Reported		Recalculated		Reported		Recalculated	
				CF (100 std)	CF (100 std)	Average CF (Initial)	Average CF (Initial)	%RSD	%RSD		
1	1 CAL	9/03/09	GR0 (C6-G0)	0.2107	0.2107	0.2058	0.2058	5.	5.	5	
2											
3											
4											

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

LDC #: 21991 F7

SDG #: Sec Cover

VALIDATION FINDINGS WORKSHEET Continuing Calibration Results Verification

Page: 1 of 1

Reviewer: JVC

2nd Reviewer: [Signature]

METHOD: GC HPLC

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

% Difference = $100 \cdot (\text{ave. CF} - \text{CF}) / \text{ave. CF}$ Where: ave. CF = initial calibration average CF
CF = continuing calibration CF
A = Area of compound
C = Concentration of compound

#	Standard ID	Calibration Date	Compound	Average CF(1cal)/ CCV Conc.	Reported		Recalculated	
					CF/Conc. CCV	%D	CF/Conc. CCV	%D
1	CCV	9/22/09 10:48	GRO	0.2058	0.2132	4.6	0.2132	4
2	CCV	9/20/09 8:46			0.1941	6	0.1941	6
3								
4								

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

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

METHOD: GC HPLC

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

% Recovery: $SF/SS * 100$
 Where: SF = Surrogate Found
 SS = Surrogate Spiked

Sample ID: # /

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery		Percent Difference
				Reported	Recalculated	
3-Fluorochlorobenzene	FID	30	100 ± 0.05	100	100	0

Sample ID:

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

Sample ID:

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

LDC #: 21991 F)

SDG #: See Cover

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

Page: 1 of 1
Reviewer: DLC
2nd Reviewer: L

METHOD: GC HPLC

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

% Recovery = $100 \times (SSC-SC)/SA$
RPD = $1 LCS - LCSD \div 2(LCS + LCSD)$

Where: SSC = Spiked sample concentration
SA = Spike added
LCS = Laboratory control sample percent recovery

SC = Concentration
LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: 171343 - LCS

Compound	Spike Added (ug/L)		Spiked Sample Concentration (ug/L)		LCS		LCSD		Percent Recovery		Percent Recovery		RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)	500	NA	500	NA	100	100								
Diesel (8015)														
Benzene (8021B)														
Methane (RSK-175)														
2,4-D (8151)														
Dinoseb (8151)														
Naphthalene (8310)														
Anthracene (8310)														
HMX (8330)														
2,4,6-Trinitrotoluene (8330)														

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

LDC #: 21991F7
 SDG #: Sec Cur

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
 Reviewer: DZ
 2nd Reviewer: [Signature]

METHOD: GC HPLC

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

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

Concentration = $\frac{(A)(F_v)(D_f)}{(R_f)(V_s \text{ or } W_s)(\%S/100)}$

- A= Area or height of the compound to be measured
- F_v= Final Volume of extract
- D_f= Dilution Factor
- R_f= Average response factor of the compound in the initial calibration
- V_s= Initial volume of the sample
- W_s= Initial weight of the sample
- %S= Percent Solid

Example:

Sample ID: # / 9 Rd Compound Name SRD

Concentration = $\frac{(7.8958 - 61744)}{(0.2058) (10000)} = 8.345/2$

#	Sample ID	Compound	Reported Concentrations	Recalculated Results Concentrations	Qualifications

Comments: _____

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: September 11, 2009

LDC Report Date: December 5, 2009

Matrix: Soil

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905198

Sample Identification

SA114-10B
SA114-30B

Introduction

This data review covers 2 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Gasoline Range Organics.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

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

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No gasoline range organic contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	Gasoline range organics	27 ug/L	All samples in SDG R0905198

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

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905198	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Data Qualification Summary - SDG R0905198**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905198	SA114-10B SA114-30B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0905198**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0905198**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21991G7

VALIDATION COMPLETENESS WORKSHEET

SDG #: R0905198

Stage 2B

Laboratory: Columbia Analytical Services

Date: 12/01/09

Page: 1 of 1

Reviewer: JVC

2nd Reviewer: [Signature]

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: <u>9/11/09</u>
IIa.	Initial calibration	A	
IIb.	Calibration verification/ <u>ICV</u>	A	<u>CV ≤ 20%</u>
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	<u>Client spec</u>
IVc.	Laboratory control samples	A	<u>LCS</u>
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	SW	<u>FB = FB 072909-50 (from R0904226)</u>

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

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

D = Duplicate
 TB = Trip blank
 EB = Equipment blank

Validated Samples: Soil

1	SA114-10B	11		21		31	
2	SA114-30B	12		22		32	
3	<u>170704-MB</u>	13		23		33	
4		14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: September 16, 2009

LDC Report Date: December 5, 2009

Matrix: Soil/Water

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905260

Sample Identification

EB091609-SO1
SA128-0.5B
SA128-10B
SA128-29B
SA128-10BMS
SA128-10BMSD

Introduction

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

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

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

Sample EB091609-SO1 was identified as an equipment blank. No gasoline range organic contaminants were found in this blank.

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No gasoline range organic contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	Gasoline range organics	27 ug/L	All samples in SDG R0905260

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

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905260	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Data Qualification Summary - SDG R0905260**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905260	EB091609-SO1 SA128-0.5B SA128-10B SA128-29B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG
R0905260**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Equipment Blank Data Qualification Summary - SDG
R0905260**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG
R0905260**

No Sample Data Qualified in this SDG

LDC #: 2199117
 SDG #: R0905260
 Laboratory: Columbia Analytical Services

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
 Stage 2B

Date: 12/01/09
 Page: 1 of 1
 Reviewer: SVB
 2nd Reviewer: [Signature]

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 9/16/09
IIa.	Initial calibration	A	
IIb.	Calibration verification/LEV	A	CV ≤ 20 %
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	SW	*EB = 1 FB = FB072909-S0 (from R0904226)

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

Validated Samples: Water + Soil

1	EB091609-S01	W	11/1	171124-WMB	21	31
2	SA128-0.5B	S	12/1	171124-SMB	22	32
3	SA128-10B		13		23	33
4	SA128-29B		14		24	34
5	SA128-10BMS		15		25	35
6	SA128-10BMSD		16		26	36
7			17		27	37
8			18		28	38
9			19		29	39
10			20		30	40

Notes: _____

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: September 17, 2009

LDC Report Date: December 5, 2009

Matrix: Soil

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905331

Sample Identification

SA51-10B
SA51009-10B
SA51-25B
SA51-36B

Introduction

This data review covers 4 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Gasoline Range Organics.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

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

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No gasoline range organic contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	Gasoline range organics	27 ug/L	All samples in SDG R0905331

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

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905331	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples SA51-10B and SA51009-10B were identified as field duplicates. No gasoline range organics were detected in any of the samples.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Data Qualification Summary - SDG R0905331**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905331	SA51-10B SA51009-10B SA51-25B SA51-36B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0905331**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0905331**

No Sample Data Qualified in this SDG

LDC #: 21991J7
 SDG #: R0905331
 Laboratory: Columbia Analytical Services

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
 Stage 2B

Date: 12/01/09
 Page: 1 of 1
 Reviewer: JVB
 2nd Reviewer: [Signature]

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: <u>9/17/09</u>
IIa.	Initial calibration	A	
IIb.	Calibration verification <u>lev</u>	A	<u>CV ≤ 20%</u>
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	N	<u>Client spec</u>
IVc.	Laboratory control samples	A	<u>LCS</u>
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	<u>D = 1, 2</u>
X.	Field blanks	SW	<u>FB = FB 072909-50 (from R0904226)</u>

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

Validated Samples: Soil

1	SA51-10B	<u>D</u>	11		21		31	
2	SA51009-10B	<u>D</u>	12		22		32	
3	SA51-25B		13		23		33	
4	SA51-36B		14		24		34	
5	<u>171124-MB</u>		15		25		35	
6			16		26		36	
7			17		27		37	
8			18		28		38	
9			19		29		39	
10			20		30		40	

Notes: _____

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: September 21, 2009

LDC Report Date: December 1, 2009

Matrix: Soil

Parameters: Gasoline Range Organics

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905387

Sample Identification

SA66-0.5B
SA66009-0.5B
SA66-10B
SA66-28B
SA70-30B
SA129-10B
SA129-29B
SA66-0.5BMS
SA66-0.5BMSD

Introduction

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

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

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

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No gasoline range organic contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	Gasoline range organics	27 ug/L	All samples in SDG R0905387

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

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905387	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples SA66-0.5B and SA66009-0.5B were identified as field duplicates. No gasoline range organics were detected in any of the samples.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Data Qualification Summary - SDG R0905387**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905387	SA66-0.5B SA66009-0.5B SA66-10B SA66-28B SA70-30B SA129-10B SA129-29B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0905387**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0905387**

No Sample Data Qualified in this SDG

LDC #: 21991L7
 SDG #: R0905387
 Laboratory: Columbia Analytical Services

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
 Stage 2B

Date: 11/25/09
 Page: 1 of 1
 Reviewer: *SV*
 2nd Reviewer: *[Signature]*

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 9/21/09
IIa.	Initial calibration	A	
IIb.	Calibration verification ACV	A	COV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D = 1, 2
X.	Field blanks	SW	FB = FB072909-SO (from R0904226)

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	SA66-0.5B	D	11	171617-MB	21	31
2	SA66009-0.5B	D	12	171737-↓	22	32
3	SA66-10B		13		23	33
4	SA66-28B		14		24	34
5	SA70-30B		15		25	35
6	SA129-10B		16		26	36
7	SA129-29B		17		27	37
8	SA66-0.5BMS		18		28	38
9	SA66-0.5BMSD		19		29	39
10			20		30	40

Notes: *(no ICV)*

