

LABORATORY DATA CONSULTANTS, INC.

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Northgate Environmental Management, Inc. 1100 Quail Street Ste. 102 Newport Beach, CA 92660 ATTN: Ms. Cindy Arnold February 19, 2010

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

Dear Ms. Arnold,

Enclosed is the revised data validation report for the fraction listed below. Please replace the previously submitted report with the enclosed revised report. We apologize for any inconvenience these oversights may have caused.

LDC Project # 22234:

<u>SDG #</u>

Fraction

R0906095 Wet Chemistry

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

Sincerely,

Erlinda T. Rauto Operations Manager/Senior Chemist

Revision 1

LDC Report# 22234L6

Laboratory Data Consultants, Inc. Data Validation Report

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

Collection Date: October 23 through October 30, 2009

LDC Report Date: February 19, 2010

Matrix: Water

Parameters: Wet Chemistry

Validation Level: Stage 4

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0906095

Sample Identification

M-141B M-141009B PB102309-A3 M-139B M-145B M-144B M-146B M-138B M-138009B M-148B M-137B EB103009-GWA4 EB103009-GWA4RE PB102309-A3MS PB102309-A3MSD PB102309-A3DUP

Introduction

This data review covers 16 water samples listed on the cover sheet. The analyses were per Standard Method 2320B for Alkalinity, EPA Method 350.1 for Ammonia as Nitrogen, EPA SW 846 Method 9056 for Bromide, Chloride, Nitrate as Nitrogen, and Sulfate, EPA Method 300.1 for Chlorate, EPA Method 120.1 for Conductivity, EPA SW 846 Method 9012A for Cyanide, EPA Method 218.6 for Dissolved Hexavalent Chromium, EPA SW 846 Method 7199 for Hexavalent Chromium, EPA Method 353.2 for Nitrite as Nitrogen, EPA SW 846 Method 9040B for pH, Standard Method 5540C for Surfactants, EPA Method 365.1 for Total Phosphorus, EPA SW 846 Method 9060 for Total Organic Carbon, Standard Method 2540C for Total Dissolved Solids, and Standard Method 2540D for Total Suspended Solids.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section X.

The following are definitions of the data qualifiers:

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

I. Technical Holding Times

Sample	Analyte	Total Time From Sample Collection Until Analysis	Required Holding Time From Sample Collection Until Analysis	Flag	A or P
EB103009-GWA4	Hexavalent chromium	25 & 25.25 hours	24 hours	J- (all detects) UJ (all non-detects)	Ρ
EB103009-GWA4RE	Nitrite as N	105 hours	48 hours	J- (all detects) R (all non-detects)	A
M-141009B	Hexavalent chromium	29 hours	24 hours	J- (all detects) UJ (all non-detects)	Ρ

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

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

II. Calibration

a. Initial Calibration

All criteria for the initial calibration of each method were met.

b. Calibration Verification

Calibration verification frequency and analysis criteria were met for each method when applicable.

*III. Blanks

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

Method Blank ID	Analyte	Concentration	Associated Samples
PB (prep blank)	Total dissolved solids	6 mg/L	M-141B M-141009B PB102309-A3 M-139B M-145B M-144B M-146B

Method Blank ID	Analyte	Concentration	Associated Samples
PB (prep blank)	Sulfate	0.13 mg/L	M-141009B PB102309-A3 M-139B M-145B M-144B M-144B M-146B M-138B M-138009B M-148B
PB (prep blank)	Chloride	0.09 mg/L	PB102309-A3
ICB/CCB	Chloride Sulfate	0.090 mg/L 0.192 mg/L	PB102309-A3
ICB/CCB	Sulfate	0.127 mg/L	M-141B
ICB/CCB	Sulfate	0.128	M-141009B M-139B M-145B M-144B M-146B M-138B M-138009B M-148B
ICB/CCB	Sulfate	0.126 mg/L	M-137B

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

Sample	Analyte	Reported Concentration	Modified Final Concentration
PB102309-A3	Total dissolved solids	9 mg/L	10U mg/L
	Chloride	0.9 mg/L	2.0U mg/L
	Sulfate	1.5 mg/L	2.0U mg/L

*Samples EB103009-GWA4 and EB103009-GWA4RE were identified as equipment blanks. No contaminant concentrations were found in these blanks with the following exceptions:

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Equipment Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
EB103009-GWA4	10/30/09	Alkalinity, total Alkalinity, bicarbonate Ammonia as N Total organic carbon Chloride Conductivity Nitrate as N pH Surfactants	1.5 mg/L 1.5 mg/L 0.348 mg/L 0.2 mg/L 0.8 mg/L 1.09 umhos/cm 0.67 mg/L 7.98 units 0.013 mg/L	M-137B

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

Sample	*Analyte	Reported Concentration	Modified Final Concentration
M-137B	Ammonia as N	0.038 mg/L	0.050U mg/L
	Nitrate as N	3.45 mg/L	3.45J+ mg/L

*Removed Conductivity from above field blanks finding table.

Sample FB080409-GW (from SDG R0904290) was identified as a field blank. No contaminant concentrations were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
FB080409-GW	8/4/09	Alkalinity, total Alkalinity, bicarbonate Ammonia as N Total organic carbon Chloride pH Total phosphorus Sulfate	1.9 mg/L 1.9 mg/L 0.035 mg/L 0.2 mg/L 1.3 mg/L 5.89 units 0.014 mg/L 0.9 mg/L	M-144B M-146B

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

Sample	Analyte	Reported Concentration	Modified Final Concentration
M-144B	Ammonia as N	0.021 mg/L	0.050U mg/L
	Total organic carbon	0.8 mg/L	1.0U mg/L
	Total phosphorus	0.023 mg/L	0.050U mg/L
M-146B	Total organic carbon	0.8 mg/L	1.0U mg/L
	Total phosphorus	0.039 mg/L	0.050U mg/L

Samples PB100209-A2 (from SDG R0905636) and PB102309-A3 were identified as pump blanks. No contaminant concentrations were found in these blanks with the following exceptions:

Pump Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
PB102309-A3	10/23/09	Alkalinity, total Alkalinity, bicarbonate Ammonia as N Total organic carbon Chloride Conductivity Nitrate as N pH Total dissolved solids Sulfate Chlorate	1.1 mg/L 1.1 mg/L 2.60 mg/L 0.2 mg/L 0.9 mg/L 3.83 umhos/cm 0.69 mg/L 5.79 units 9 mg/L 1.5 mg/L 23 ug/L	M-141B M-141009B M-139B M-145B M-148B
PB100209-A2	10/2/09	Alkalinity, total Alkalinity, bicarbonate Ammonia as N Chloride Conductivity pH Total phosphorus	1.1 mg/L 1.1 mg/L 0.025 mg/L 0.9 mg/L 1.84 umhos/cm 6.49 units 0.007 mg/L	M-144B M-146B

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

Sample	Analyte	Reported Concentration	Modified Final Concentration
M-141B	Ammonia as N	1.95 mg/L	1.95J+ mg/L
M-141009B	Ammonia as N	0.054 mg/L	0.054J+ mg/L
M-139B	Ammonia as N	1.10 mg/L	1.10J+ mg/L
	Total organic carbon	0.5 mg/L	1.0U mg/L
	Nitrate as N	3.66 mg/L	3.66J+ mg/L
M-145B	Ammonia as N	0.191 mg/L	0.191J+ mg/L
	Nitrate as N	2.90 mg/L	2.90J+ mg/L
M-148B	Ammonia as N	0.011 mg/L	0.050U mg/L
	Nitrate as N	6.37 mg/L	6.37J+ mg/L
M-144B	Ammonia as N	0.021 mg/L	0.050U mg/L
	Total phosphorus	0.023 mg/L	0.050U mg/L
M-146B	Total phosphorus	0.039 mg/L	0.050U mg/L

Sample FiltB092509-A2 (from SDG R0905462) was identified as a filter blank. No contaminant concentrations were found in this blank.

IV. Matrix Spike/Matrix Spike Duplicates

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

V. Duplicates

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable. Results were within QC limits.

VI. Laboratory Control Samples

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

LCS ID (Associated Samples)	Analyte	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
LCS (EB103009-GWA4)	Nitrite as N	87 (90-110)	-	-	J- (all detects) UJ (all non-detects)	Ρ

VII. Surrogate Spikes

Surrogates were added to all samples and blanks as required by method 300.1. All surrogate recoveries (%R) were within QC limits.

VIII. Sample Result Verification and Project Quantitation Limit

All sample result verifications were acceptable.

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0906095	All analytes reported below the PQL.	J (all detects)	Α

IX. Overall Assessment

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

Sample	Compound	Flag	A or P
EB103009-GWA4RE	Nitrite as N	х	A

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

X. Field Duplicates

Samples M-141B and M-141009B and samples M-138B and M-138009B were identified as field duplicates. No contaminant concentrations were detected in any of the samples with the following exceptions:

	Conce	ntration				
Analyte	M-141B	M-141009B	(Limits)	Difference (Limits)	Flags	A or P
Ammonia as N	1.95 mg/L	0.054 mg/L	-	1.896 (≤0.050)	J (all detects)	A
Alkalinity, total	260 mg/L	260 mg/L	0 (≤30)	-	-	-
Alkalinity, bicarbonate	260 mg/L	260 mg/L	0 (≤30)	-	-	-
Bromide	2.5 mg/L	2.6 mg/L	-	0.1 (≤1.0)	-	-
Chloride	999 mg/L	994 mg/L	1 (≤30)	-	-	-
Conductivity	9500 umhos/cm	9620 umhos/cm	1 (≤30)	-	-	-
Hexavalent chromium	11.0 mg/L	11.1 mg/L	1 (≤30)	-	_	-
Nitrate as N	31.1 mg/L	30.8 mg/L	1 (≤30)	-	-	-
Nitrite as N	0.155 mg/L	0.159 mg/L	3 (≤30)	-	-	-
рН	6.99 units	7.04 units	1 (≤30)	-	-	-
Sulfate	2210 mg/L	2600 mg/L	16 (≤30)	-	-	-

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	Concer	ncentration			Difference	
Analyte	M-141B	M-141009B	(Limits)	(Limits) (Limits) F		A or P
Surfactants	0.014 mg/L	0.016 mg/L	-	0.002 (≤0.020)	-	-
Total dissolved solids	9560 mg/L	9480 mg/L	1 (≤30)	-	-	-
Total organic carbon	3.2 mg/L	3.3 mg/L	-	0.1 (≤1.0)	-	-
Total phosphorus	0.027 mg/L	0.026 mg/L	-	0.001 (≤0.050)	-	-
Chlorate	2330000 ug/L	2270000 ug/L	3 (≤30)	-	-	-

	Concer	ntration		Difference		
Analyte	M-138B	M-138009B	(Limits)	(Limits)	Flags	A or P
Ammonia as N	0.007U mg/L	0.073 mg/L	-	0.066 (≤0.050)	J (all detects) UJ (all non-detects)	A
Alkalinity, total	347 mg/L	342 mg/L	1 (≤30)	-	-	-
Alkalinity, bicarbonate	347 mg/L	342 mg/L	1 (≤30)	-	-	-
Chloride	146 mg/L	148 mg/L	1 (≤30)	-	-	-
Conductivity	3500 mg/L	3490 mg/L	0 (≤30)	-	-	-
Hexavalent chromium	0.050 umhos/cm	0.050 umhos/cm	0 (≤30)	-	-	-
Nitrate as N	2.20 mg/L	2.16 mg/L	2 (≤30)	-	-	-
Nitrite as N	0.008 mg/L	0.007U mg/L	-	0.001 (≤0.010)	-	-
рН	7.48 mg/L	7.49 mg/L	0 (≤30)	-	-	-
Sulfate	1400 units	1380 units	1 (≤30)	-	-	-
Surfactants	0.005 mg/L	0.007 mg/L	-	0.002 (≤0.020)	-	-
Total dissolved solids	2810 mg/L	2850 mg/L	1 (≤30)	-	-	-
Total organic carbon	1.5 mg/L	1.6 mg/L	-	0.1 (≤1.0)	-	-

*Indicates change as the result of report review. SDG R0906095

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	Concer	ntration				
Analyte	M-138B	M-138009B	- RPD (Limits)	Difference (Limits)	Flags	A or P
Total phosphorus	0.031 mg/L	0.030 mg/L	-	0.001 (≤0.050)	_	-
Total suspended solids	6.3 mg/L	7.1 mg/L	12 (≤30)	-		-
Chlorate	16800 ug/L	16800 ug/L	0 (≤30)	-	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Wet Chemistry - Data Qualification Summary - SDG R0906095

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
R0906095	EB103009-GWA4 M-141009B	Hexavalent chromium	J- (all detects) UJ (all non-detects)	Р	Technical holding times (h)
R0906095	EB103009-GWA4RE	A4RE Nitrite as N J- (all detects) R (all non-detects		A	Technical holding times (h)
R0906095	EB103009-GWA4	Nitrite as N	J- (all detects) UJ (all non-detects)	Р	Laboratory control samples (%R) (I)
R0906095	M-141B M-141009B PB102309-A3 M-139B M-145B M-145B M-144B M-146B M-138B M-138B M-138009B M-148B M-137B EB103009-GWA4 EB103009-GWA4RE	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (sp)
R0906095	EB103009-GWA4RE	Nitrite as N	x	A	Overall assessment of data (o)
R0906095	M-141B M-141009B	Ammonia as N	J (all detects)	A	Field duplicates (Difference) (fd)
R0906095	M-138B M-138009B	Ammonia as N	J (all detects) UJ (all non-detects)	Α	Field duplicates (Difference) (fd)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Wet Chemistry - Laboratory Blank Data Qualification Summary - SDG R0906095

SDG	Sample	Analyte	Modified Final Concentration	A or P	Code
R0906095	PB102309-A3	Total dissolved solids Chloride Sulfate	10U mg/L 2.0U mg/L 2.0U mg/L	A	Ы

*Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Wet Chemistry - Equipment Blank Data Qualification Summary - SDG R0906095

SDG	Sample	Analyte	Modified Final Concentration	A or P	Code
*R0906095	M-137B	Ammonia as N Nitrate as N	0.050U mg/L 3.45J+ mg/L	A	be

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Wet Chemistry - Field Blank Data Qualification Summary - SDG R0906095

SDG	Sample	Analyte	Modified Final Concentration	A or P	Code
R0906095	M-144B	Ammonia as N Total organic carbon Total phosphorus	0.050U mg/L 1.0U mg/L 0.050U mg/L	A	bf
R0906095	M-146B	Total organic carbon Total phosphorus	1.0U mg/L 0.050U mg/L	A	bf

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Wet Chemistry - Pump Blank Data Qualification Summary - SDG R0906095

SDG	Sample	Analyte	Modified Final Concentration	A or P	Code
R0906095	M-141B	Ammonia as N	1.95J+ mg/L	Α	bp
R0906095	M-141009B	Ammonia as N	0.054J+ mg/L	A	bp
R0906095	M-139B	Ammonia as N Total organic carbon Nitrate as N	1.10J+ mg/L 1.0U mg/L 3.66J+ mg/L	A	bр
R0906095	M-145B	Ammonia as N Nitrate as N	0.191J+ mg/L 2.90J+ mg/L	A	bp
R0906095	M-148B	Ammonia as N Nitrate as N	0.050U mg/L 6.37J+ mg/L	A	bp
R0906095	M-144B	Ammonia as N Total phosphorus	0.050U mg/L 0.050U mg/L	A	bp
R0906095	M-146B	Total phosphorus	0.050U mg/L	А	bp

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Wet Chemistry - Filter Blank Data Qualification Summary - SDG R0906095

No Sample Data Qualified in this SDG

			Tror	nox Nort	thgate H	lenderson			- 12-70	<u>አ</u> -ለዋ
DC #:	22234L6	VAI		I COMP	LETEN	ESS WOR	KSHEET		Date: <u>ICC</u>	(0)
DG #:	R0906095			5	Stage 4				Page:	
bora	tory: Columbia Analytica	I Ser	<u>/ices</u>					2r	d Reviewer: \	-
METHOD: (Analyte) Alkalinity (SM2320B), Ammonia-N (EPA Method 350.1), Bromide, Chloride, Nitrate-N, Nitrite-N, Sulfate										
(EPA SW846 Method 9056), Chlorate (EPA Method 300.1), Conductivity (EPA Method 120.1), Cyanide (EPA SW846 Method										
12A)	, Dissolved Hexavalent (Chron	nium (EPA	Method 21	<u>8.6), Hex</u>	avalent Chroi	mium (EPA S)	1V846 Me	oborus (FPA Method	
V846	5 Method 9040B/ 9045D1	<u>, Sun</u> (SM2)	540D) TC	C (ani	GO N	inc a la a	100014.0), 10	7		
ne sa alidati	mples listed below were ion findings worksheets.	revie	wed for ea	ch of the fo	ollowing v	alidation area	as. Validation	findings a	are noted in attached	
	Validation	\rea					Commen	ts		
1	Technical holding times			SW	Sampling of	ates: 10/2	<u>3-10</u>	1301	01	
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	Dianka			Sul						
<u>III.</u> N/	Blanks Surrogate Spikes			A						
v	Matrix Spike/Matrix Spike Duplicates A msiD									
VI.	Duplicates			A	04					
VII.	Laboratory control samples			SN	1cs1	P				
VIII.	Sample result verification			A						
IX.	Overall assessment of data			SW/			.			
X .	Field duplicates			SW	(1,2	<u>امر (8) (</u>		1000	Orenvo C. IGa	00.
XI	Field blanks			152	LB=10	D. Pum	piblank=)	FBFF	100501076W (506)	KOD
ote:	A = Acceptable N = Not provided/applicable SW = See worksheet	•	ND = N R = Rir FB = F	lo compound isate ield blank	FifeL is detected	D = Di D = Di TB = T EB = E	iplicate 5964 rip blank Equipment blank	Corsse	(See beb	о ѕчы ~)
lidate	ed Samples:						T			1
	M-141B	11	M-137B		21	PBW)	31		
	M-141009B	12	EB103009-G	WA4	22			32	er	
	PB102309-A3	13	EB103009-G	WA4RE	23	<u> </u>		33		
	M-139B	14	PB102309-A	3MS	24			34		
	M-145B	15	PB102309-A	3MSD	25			35		
	M-144B	16	PB102309-A	3DUP	26			36		
	M-146B	17			27	<u> </u>		37		
	M-138B	18			28	<u> </u>		38		
	M-138009B	19	<u> </u>		29		:	39		-
0	M-148B	20			30			40		J
otes:_	Pump Blank =	(B)	00209-	AZ C	SOGNE A	0906636	<u>}</u>			

1. S. S. S.

7779 LDC #:__ SDG #:_ See

VALIDATION FINDINGS CHECKLIST

Page of Z Reviewer: CIZ 2nd Reviewer:

Validation Area	Ye	s No	N/	Findings/Comments
Trachrical holloganese Sec.				
All technical holding times were met.		1-	T	
Coolar temperature criteria was met.	レ	\vdash		
IT Collection				
Were all instruments calibrated daily, each set-up time?	\leq	1		-
Were the proper number of standards used?	1	1		
Were all initial calibration correlation coefficients > 0.995?	1	Ľ		
Were all initial and continuing calibration verification %Rs within the 90-110% QC limits?	~	Ł		
Were titrant checks performed as required? (Level IV only)	-	L		
Were balance checks performed as required? (Level IV only)	1	1		
				ren de la company de la com
Was a method blank associated with every sample in this SDG?	1			·
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.	-	\vdash		
Were a matrix spike (MS) and duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD or MS/DUP. Soil / Water.	~			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the 75-125 QC limits? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.	V	~		
Were the MS/MSD or duplicate relative percent differences (RPD) \leq 20% for waters and \leq 35% for soil samples? A control limit of \leq CRDL(\leq 2X CRDL for soil) was used for samples that were \leq 5X the CRDL, including when only one of the duplicate sample values were \leq 5X the CRDL.	7			
Was an LCS anayized for this SDG?	7		Π	
Was an LCS analyzed per extraction batch?	1			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the 80-120% (85-115% for Method 300.0) QC limits?		4		
VI Regional Quality Assurance and Quality Control - 6.4				
Were performance evaluation (PE) samples performed?		1	\mathbb{T}	_
Nere the performance evaluation (PE) samples within the accentance limits?			1	

Method: Inorganics (EPA Method Second)

WETC-EPA.IV version 1.0



VALIDATION FINDINGS CHECKLIST

· .	Page:	ZotZ
	Reviewer:	ge
2nd	Reviewer ;	

Validation Area	Yes	No	NA	Findings/Commerits
VII Seraple Result Ventionion				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	/			
Were detection limits < RL?				
Mill, Ckerningsbergenera of data				
Overall assessment of data was found to be acceptable.	/			
X. Fueld displication				
Field duplicate pairs were identified in this SDG.	/	-		· ·
Target analytes were detected in the field duplicates.	7			
X. Fieldsheren				
Field blanks were identified in this SDG.	1	\geq		
Target analytes were detected in the field blanks.	_1			

WETC-EPA.IV version 1.0



All circled methods are applicable to each sample.

Sample ID	Matrix	Parameter
1-12	water	Alk pH Br CI NO3 NO2 SO4 NH3 TOC CN Cr6+ T-P MBAS TDS TSS Cond CIO3 CH2
B		Alk pH Br CI NO3 (NO2) SO4 NH3 TOC CN Cr6+ T-P MBAS TDS TSS Cond CIO3 CIO4
		Alk pH Br CI NO3 NO2 SO4 NH3 TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO3 ClO4
QC: M-16		Alk pH Br CI NO3 NO2 SO4 NH3 TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond CIO2 CIO4
		Alk pH Br CI NO3 NO2 SO4 NH3 TOC CN Cr6+ T-P MBAS TDS TSS Cond CIO3 CIO4
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
	_	Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁵⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁵⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr^{6+} T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁸⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr^{6+} T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO $_3$ NO $_2$ SO $_4$ NH $_3$ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO $_3$ ClO $_4$
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁵⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr^{6+} T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr^{6+} T-P MBAS TDS TSS Cond ClO ₃ ClO ₄
		Alk pH Br CI NO $_3$ NO $_2$ SO $_4$ NH $_3$ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO $_3$ ClO $_4$
		Alk pH Br CI NO ₃ NO ₂ SO ₄ NH ₃ TOC CN Cr ⁶⁺ T-P MBAS TDS TSS Cond ClO ₃ ClO ₄

Comments:____

TronoxWetChem.wpd



VALIDATION FINDINGS WORKSHEET Technical Holding Times



 All circled dates have exceeded the technical holding time.

 Y
 N/A

 Y
 N/A

 Were all samples preserved as applicable to each method ?

 Y
 N/A

 Were all cooler temperatures within validation criteria?

		2000	aval	110				
Method:		1144	L18.6	MZ-N				
Parameters:		Crbt	Cr6+	551.2				
Technical holding t	me:	ayhrs	=24103	48265			<u> </u>	
	Sampling	Analysis	Analysia	Analysis	Analysis	Analysis		
Sample ID	date	date	date	date	date	date	Qualifier	
12	1013009	1031109	(25ks)				J-1w1p	(h)
J		1 12:26	(25.25Ks					
13	V			1113/09	(105hrs)		J-IR/A	
	10/23/09		15:05	(Zghas)			J-105/P	
X	10.00							
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* Reanlysis

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SDG #: See Cover LDC #: 22234L6

VALIDATION FINDINGS WORKSHEET **Blanks**



METHOD: Inorganics, Method See Cover

Reason Code: bl

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". <u>V N N/A</u> Were all samples associated with a given method blank? <u>V N N/A</u> Were any inorganic contaminants detected above the reporting limit in the method blanks? If yes, please see qualifications below.

Sample Identification 1-7 Associated Samples: 9/10 ო Blank Action Limit Maximum ICB/CCB (mg/L) Blank ID Conc. units: mg/L PB (mg/L) φ Analyte TDS

Sample Identification 2-10 **Associated Samples:** No Qualifiers Blank Action Limit Maximum ICB/CCB (mg/L) Blank ID mg/L PB (mg/L) 0.13 Conc. units: Analyte **S04**

Associated Samples: 3	Blank Sample Identification	Action Limit 3	0.9/2.0	1.5/2.0
	Blank	Action Limit	0	
<u>9/L</u>	k ID Maximum	ICB/CCB (mg/L)	060.0	0.192
Conc. units: mg	Analyte Blank	8d /bm)	CI 0.0	SO4

		_	
Associated Samples: 1 Associated Samples: 1	Sample Identification	o Qualifiers	
		l No Qua	
	Blank	Action Limi	
	Maximum	ICB/CCB (mg/L)	0.127
: mg/L	Blank ID	PB (mg/L)	
conc. units	Analvte		SO4

22234L6.wpd

мс.,

SDG #: See Cover LDC #: 22234L6

VALIDATION FINDINGS WORKSHEET

Blanks

Reason Code: bl

Page: of C Reviewer: 2nd Reviewer.

METHOD: Inorganics, Method See Cover

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". <u>V N N/A</u> Were all samples associated with a given method blank? <u>V N N/A</u> Were any inorganic contaminants detected above the reporting limit in the method blanks? If yes, please see qualifications below.

Sample Identification 2, 4-10 Associated Samples: No Qualifiers Blank Action Limit Maximum ICB/CCB (mg/L) 0.128 Blank ID Conc. units: mg/L PB (mg/L) Analyte S04

	le Identification		
	Identification		
11	Sample		
amples:			
sociated S			
As			
		No Qualifiers	
	Blank	Action Limit	
	Maximum	ICB/CCB (mg/L)	0.126
: mg/L	Blank ID	PB (mg/L)	
Conc. units	Analyte		S04

22234L6.wpd

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LDC #: 22234L6 SDG #: See Cover

VALIDATION FINDINGS WORKSHEET



METHOD: Inorganics, MethodSee CoverYN N/AWere field blanks identified in this SDG?Wore target analytes detected in the field blanks?Wore target analytes detected in the field blanks?Blank units: mg/LAssociated sample units: mg/LSampling date:10/30/09Soil factor appliedField blank type: (circle one) Field Blank / Rinsate / Other

Associated Samples: 11

Reason Code: be

cation												
Sample Identifi												
	11			0.038 / 0.050			2-108-1-1-	3.45 J+				
	Action Level			3.48			10.9	6.7				
Blank ID	12	1.5	1.5	0.348	0.2	0.8	1.09	0.67	7 GR	0.013	2.2.2	
Analyte		Total Alkalinity	Bicarbonate Alkalinity	Ammonia as N	TOC (average)	Chloride	Conductivity (umhos/cm)	Nitrate as Nitroden	nH (nH I Inite)	Surfactants		L

22234L6eb.wpd

LDC #: 22234L6 SDG #: See Cover

VALIDATION FINDINGS WORKSHEET Field Blanks

Page:<u>of</u> Reviewer:<u>CC</u> 2nd Reviewer: <u>L</u>

METHOD: Inorganics, Method See CoverN N/AWere field blanks identified in this SDG?V N N/AWere target analytes detected in the field blanks?Blank units: mg/LAssociated sample units: mg/LSampling date:8/4/09Soil fgctor appliedNAField blank type: (circle one) Field Blank / Rinsate / Other. FB

Reason Code: bf

Associated Samples: 6, 7

Analvta	Blank ID				Sample Identi	fication		
	FB080409-GW (SDG#: R0904290)	Action Level	9	7				
Total Alkalinity	1.9							
Bicarbonate Alkalinity	1.9							
Ammonia as N	0.035		0.021 / 0.050					
TOC (average)	0.2		0.8/1.0	0.8 / 1.0				
Chloride	1.3							
pH (pH Units)	5.89							
Total Phosphorus	0.014		0.023 / 0.050	0.039 / 0.050				
Sulfate	0.9							

22234B6area2fb.wpd

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SDG #: See Cover LDC #: 22234L6

VALIDATION FINDINGS WORKSHEET **Field Blanks**



Y)NN/AWere target analytes detected in the field blanks?Blank units:mg/LAssociated sample units:mg/LSampling date:10/23/09Soil factor appliedNAField blank type:(circle one)Field Blank / Rinsate / Other:Pump Blank METHOD: Inorganics, Method See Cover X N N/A Were field blanks identified in this SDG? YN N/A

1, 2, 4, 5, 10 Associated Samples:

Reason Code: bp

Analyte	Blank ID					Sample Identii	ication		
	Э	Action Level	-	7	4	£	10		
Total Alkalinity	1.1								
Bicarbonate Alkalinity	1.1								
Ammonia as N	2.60	26.0	1.95 J+	0.054 J+	1.10 J+	0.191 J+	0.011 / 0.050		
TOC (average)	0.2				0.5 / 1.0				
Chloride	6.0								
Conductivity (Imbos/cm)	3.83	38.3							
Nitrata as Nitroden	0.69	69			3.66 J+	2.90 J+	6.37 J+		
nuace as mused	5.79								
TDS	6								
S04	1.5								
C103(110/17)	23	230							

22234L6Area3Pb.wpd

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LDC #: 22234L6 SDG #: See Cover

VALIDATION FINDINGS WORKSHEET Field <u>Blanks</u>

Page: of Reviewer: CA

METHOD: Inorganics, Method See CoverN N/AWere field blanks identified in this SDG?VN N/AWere target analytes detected in the field blanks?Blank units: mg/LAssociated sample units: mg/LSampling date: 10/2/09Soil factor appliedField blank type: (circle one) Field Blank / Rinsate / Other Pump Blan

Associated Samples: 6,7

Reason Code: bp

							-			
cation										
Sample Identific										A CONTRACTOR OF A CONTRACTOR A
	7							0.039 / 0.050		
	ω			0.021 / 0.050				0.023 / 0.050		-
	Action Level					18.4				-
Blank ID	PB100209-A2 (SDG#R0905636)	1.1	1.1	0.025	σc	1.84	6.49	0.007		
Analyte		Total Alkalinity	Bicarbonate Alkalinity	Ammonia as N	Chloride	Conductivity (umbos/cm)	DH (DH Units)	Total Phosphorus		

Area2PumpBlank.wpd

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spg #: See Cared 1HE2222 # 2011

VALIDATION FINDINGS WORKSHEET Laboratory Control Samples (LCS)

Page: Reviewer: 2nd Reviewer:

METHOD: Inorganics, Method See Could

Prease see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". V N N/A Were all LCS percent recoveries (%F) within the control limits of 80-120% (85-115% for Method 300.0)?

Were recalculated results acceptable? See Level IV Recalculation Worksheet for recalculations. Y N NA WEY:

).					
4	17610	Matrix	Analyte	%R (limits)	Associated Samples	Qualifications
*	571	Joran	N-20N	R7 (90-110)	77	7-10712 (X)
)					
L						
				an a	a su a contra a su a contra a contra a contra a su a contra a contra a contra a contra a contra a contra a cont	
Cor	ments:					

LCS.6

Do #: 22234L6

VALIDATION FINDINGS WORKSHEET Overall Assessment of Data

J J g Page: Reviewer: ______ 2nd Reviewer: ______

7,435

METHOD: Inorganics, Method _

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

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

NNA Was the overall quality and usability of the data acceptable?

		Samula ()	Finding	Associated Samples	Qualifications
*		61	NO2-N		\$ X (o) /A
)			
ŀ					
Comn	nents:				

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VALIDATION FINDINGS WORKSHEET Field Duplicates



Inorganics, Method See Cover

YN NA YN NA

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

	Concentra	tion (mg/L)				Qualification
Analyte	1	2	RPD (≤30)	Difference	Limits	(Parent only)
Ammonia as N	1.95	0.054		1.896	(≤0.050)	Jdet/A (fd)
Total Alkalinity	260	260	0			
Bicarbonate Alkalinity	260	260	0			
Bromide	2.5	2.6		0.1	(≤1.0)	
Chloride	999	994	1			
Conductivity (umhos/cm)	9500	9620	1			
Hexavalent Chromium	11.0	11.1	1			
Nitrate as N	31.1	30.8	1			
Nitrite as N	0.155	0.159	3			
pH (pH Units)	6.99	7.04	1			
Sulfate	2210	2600	16			
Surfactants	0.014	0.016		0.002	(≤0.020)	
TDS	9560	9480	1			
TOC, Average	3.2	3.3		0.1	(≤1.0)	
Total Phosphorus	0.027	0.026		0.001	(≤0.050)	
Chlorate (ug/L)	2330000	2270000	3			

V:\FIELD DUPLICATES\FD_inorganic\22234L6.wpd

VALIDATION FINDINGS WORKSHEET Field Duplicates

Page: of Reviewer: 2nd Reviewer:

Inorganics, Method See Cover

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

	Concentrati	on (mg/L)				Qualification
Analyte	8	9	RPD (≤30)	Difference	Limits	(Parent only)
Ammonia as N	0.007U	0.073		0.066	(≤0.050)	J/UJ/A (fd)
Total Alkalinity	347	342	1			
Bicarbonate Alkalinity	347	342	1			
Chloride	146	148	1			
Conductivity (umhos/cm)	3500	3490	0			
Hexavalent Chromium	0.050	0.050	0			
Nitrate as N	2.20	2.16	2			
Nitrite as N	0.008	0.007U		0.001	(≤0.010)	
pH (pH Units)	7.48	7.49	0			
Sulfate	1400	1380	1			
Surfactants	0.005	0.007		0.002	(≤0.020)	
TDS	2810	2850	1			
TOC, Average	1.5	1.6		0.1	(≤1.0)	
Total Phosphorus	0.031	0.030		0.001	(≤0.050)	
TSS	6.3	7.1	12			
Chlorate (ug/L)	16800	16800	0			

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Validatin Findings Worksheet Initial and Continuing Calibration Calculation Verification

5 2nd Reviewer: Reviewer:__ Page:

2 The correlation coefficient (r) for the calibration of \overline{NHSM} was recalculated.Calibration date: \overline{M} Method: Inorganics, Method Sel Could

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

%R = <u>Found X 100</u> True

Where,

Found = concentration of each analyte <u>measured</u> in the analysis of the ICV or CCV solution True = concentration of each analyte in the ICV or CCV source

					Barakulatari	Renorted	Acceptable
					Nevalvulated		
Tyme of analysis	Analvte	Standard	Conc. (ug/l)	Area	r or r ²	r or r ²	(V/N)
Initial calibration		s1	0	11542		· · · · · · · · · · · · · · · · · · ·	
		s2	0.01	103066			
		s3	0.02	218582			
	NACN	s4	0.05	478010	1.0000	0.9999)-
	>	s5	0.1	938886			
		s6	0.2	1766170			-
		s7	0.5	4174432			_
		88 88	1	8288506	,		
		s9	2	16582717			
Calibration verification	Jol	BC	5	1221.21	101]	
	C 67	CCV	C, O	386 h' O	001	l	
	4-4	SS	0,45	P1572	96	1	\bigwedge
Calibration verification							

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

LDC #: 50200 SDG #: 50200	340	UL VAL	JDATION FINDIN evel IV Recalcula	VGS WORKSHE		2 Znd H	Page: 01 leviewer: C15
METHOD: Inorgan Percent recoveries	ilcs, Method SelCO (%FI) for a laboratory cor		e matrix spike semu	la Wate Fenelmiteted	tioning the following		
%R = <u>Found</u> x 10 True	io Where, Fou Trus	nd =	centration of each an nd = SSR (spiked sa centration of each an	able measured in t mple result) - SR (s alyte in the source.	the analysis of the si ample result).	ample. For the matri	x spike calculation,
A sample and dup	licate relative percent diff	erence (RPD) wa	is recalculated using	the following formul		·	
RPD = <u>1S-D1</u> × (S+D)/2	100 Where, S = D =	Orig	inal sample concentr licate sample concer	ation itration		· · ·	
Sample ID	Type of Analysis	Element	Found / S (unlts)	True / D (unite)	Recalculated %R / RPD	Reported %R / Rph	Acceptable XXXX
577	Laboratory control sample	4.4	0.601	0,800	101	1 Q1)
1-1	Matric spike sample	C103	(rssn.en) IQH	100	μ	97	
91	Duplicate sample	\rightarrow	52	172	6	d	
Comments: Refer results.	to appropriate workshee	t for list of qualif	cations and associat	ed samples when re	ported results do nc	t agree within 10.0%	of the recelculated
TOTCLC.6							
			•				

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LDC SDG #: <

ALIDATION FINDINGS WORKSHEET Sample Calculation Verification

Page Reviewer 2nd reviewer

SECON METHOD: Inorganics, Method

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". Have results been reported and calculated correctly?

Y N N/A मे N N/A YN NA

Are results within the calibrated range of the instruments? Are all detection limits below the CRQL?

AIK

Recalculation:

Concentration = Alk= Vritrant X Nritrant X50,000 Vsample

(0.00N)(50,000) 20ml = 113mg/k AIK=

reported with a positive detect were

#	Sample ID	Analyte	Reported Concentration (\NS[(Calculated Concentration (Mg ()	Acceptable (Y/N)
	Ц	Alk, Total	113	113	LY_
		AIK Brad	113	113	
		NHZ-N	1.10	1.10	
		BC	0.8	0.8	
		TÔC	<u>05</u>	0.5	ļ
		Cl	312	312	<u> </u>
		Cr6t	0.0010	0090	
		Cond (unhasicm)	3680	3680	
		@NO3-N	3.66	3.66	
		PH (pHUNits)	7.44	7.44	
 		T-P	0.024	0024	
		TOS	288	288	<u> </u>
		Tgs	125	125	<u> </u>
		Say	1150	1150	<u> </u>
		CIO3 (ugl)	15700	15700	1 U
		0,			<u> </u>
—				· ·	<u></u>
					<u> </u>
		•		<u></u>	L

Note:

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ЪС SDG

VALIDATION FINDINGS WORKSHEET Sample Calculation Verification

Pan Reviewer 2nd reviewer:

= 177mg/L

Secar METHOD: inorganics, Method

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". χ N/A Have results been reported and calculated correctly?

<u>N N/A</u> Y N N/A Y) N N/A

Are results within the calibrated range of the instruments? Are all detection limits below the CRQL?

______reported with a positive detect were

C|= 6.0262707(Area)+0.080741

Recalculation: ₩0 (0.0262707 (165.558) +0.08074])

	Samala ID	Anziytə	Reported Concentration (Mg (Calculated Concentration (MS/L)	Acceptable (Y/N)
#	Sample in	Alk Total	150	150	7
		Alk Bicach	150	150	
		NHZ	0.19	0.191	·
		TOC	2,4	2.4	
 		CL	177	177	
 		C(6+	0,009	0.009	
 		Cond (unhos cm)	1820	1820	<u> </u>
 		NOSN	2.90	2.90	<u> </u>
		NOL-N	0.033	0.033	
		pit (pitunits)	7.44	7.44	<u> </u>
		T-P	0.041	0.04	<u> </u>
		TOS	1350	1350	<u> </u>
		<u> </u>	3.7	3.7	<u>↓ </u>
		SOy	526	526	
		CIOY (ugl)	1 1215	713	
					<u> </u>
				<u> </u>	
	1		<u> </u>		+
H				1 ·	

Note:

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