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

May 20, 2010

SUBJECT: Tronox LLC Facility,2010 Parcels, Henderson, Nevada,
Data Validation

Dear Ms. Arnold,

Enclosed are the final validation reports for the fractions listed below. These SDGs were received on May 5, 2010. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 23104:

SDG #	Fraction
280-2143-1 280-2306-1	Polynuclear Aromatic Hydrocarbons, Arsenic

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

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

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

Sincerely,

ERauto

Erlinda T. Rauto
Operations Manager/Senior Chemist

Attachment 1

Stage 2B/4 **LDC #23104 (Tronox LLC-Northgate, Henderson NV / Tronox Parcels)**

LDC	SDG#	DATE REC'D	(3) DATE DUE	PAH (8270C)		As (6020)																															
Matrix:	Water/Soil			W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S
A	280-2143-1	05/05/10	05/26/10	2	2	2	2																														
B	280-2306-1	05/05/10	05/26/10	2	0	-	-																														
B	280-2306-1	05/05/10	05/26/10	0	1	-	-																														
Total	T/LR			4	3	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11

Shaded cells indicate Stage 4 validation (all other cells are Stage 2B validation). These sample counts do not include MS/MSD, and DUPs

EDD CHECKLIST

LDC #: 23104
SDG #: 280-143-1, 280-2306-1

Reviewer: JE
2nd Reviewer: BC

Tronox Northgate Henderson Worksheet

EDD Area	Yes	No	NA	Findings/Comments
I. Completeness				
Is there an EDD for the associated Tronox validation report?	X			
II. EDD Qualifier Population				
Were all qualifiers from the validation report populated into the EDD?	X			
III. EDD Lab Anomalies				
Were EDD anomalies identified?	X			
If yes, were they corrected or documented for the client?	X			See EDD_discrepancy_ form_LDC23104_051910.doc
IV. EDD Delivery				
Was the final EDD sent to the client?	X			

Tronox LLC Facility,2010 Parcels, Henderson, Nevada
Data Validation Reports
LDC #23104

Polynuclear Aromatic Hydrocarbons

LDC

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2010 Parcels, Henderson, Nevada

Collection Date: April 6, 2010

LDC Report Date: May 17, 2010

Matrix: Soil/Water

Parameters: Polynuclear Aromatic Hydrocarbons

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2143-1

Sample Identification

Q3-PF-3-1-0.0**
Q3-PF-3-1-0.0FD
FB-PARCELS-032910
EB-PARCELS-032910
Q3-PF-3-1-0.0MS
Q3-PF-3-1-0.0MSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 4 soil samples and 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Polynuclear Aromatic Hydrocarbons.

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).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

Samples indicated by a double asterisk on the front cover underwent a Stage 4 review. A Stage 2B review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Stage 2B criteria since this review is based on QC data.

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

Percent relative standard deviations (%RSD) were less than or equal to 30.0% for all compounds.

Average relative response factors (RRF) for all compounds were within method and validation criteria

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

Percent differences (%D) between the initial calibration RRF and the continuing calibration RRF were within the method criteria of less than or equal to 20.0% for calibration check compounds (CCCs) and 25.0% for all other compounds.

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

All of the continuing calibration relative response factors (RRF) were within method and validation criteria

V. Blanks

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

Sample EB-PARCELS-032910 was identified as an equipment blank. No polynuclear aromatic hydrocarbon contaminants were found in this blank.

Sample FB-PARCELS-032910 was identified as a field blank. No polynuclear aromatic hydrocarbon contaminants were found in this blank.

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

Sample	Internal Standards	Area (Limits)	Compound	Flag	A or P
Q3-PF-3-1-0.0**	Perylene-d12	374011 (820545-3282178)	Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A
Q3-PF-3-1-0.0FD	Perylene-d12	357940 (820545-3282178)	Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A

XI. Target Compound Identifications

All target compound identifications were within validation criteria for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

XII. Project Quantitation Limit

All project quantitation limits were within validation criteria for samples on which a Stage 4 review was performed.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2143-1	All compounds reported below the PQL.	J (all detects)	A

Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

XIII. Tentatively Identified Compounds (TICs)

Tentatively identified compounds were not reported by the laboratory.

XIV. System Performance

The system performance was acceptable for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

XV. Overall Assessment

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

XVI. Field Duplicates

Samples Q3-PF-3-1-0.0** and Q3-PF-3-1-0.0FD were identified as field duplicates. No polynuclear aromatic hydrocarbons were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	Q3-PF-3-1-0.0**	Q3-PF-3-1-0.0FD				
Phenanthrene	370U	18	-	352 (≤370)	-	-
Pyrene	15	34	-	19 (≤370)	-	-
Benzo(b)fluoranthene	370U	110	-	260 (≤370)	-	-
Chrysene	370U	29	-	341 (≤370)	-	-
Fluoranthene	370U	49	-	321 (≤370)	-	-

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Polynuclear Aromatic Hydrocarbons - Data Qualification Summary - SDG 280-2143-1

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2143-1	Q3-PF-3-1-0.0** Q3-PF-3-1-0.0FD	Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) R (all non-detects)	A	Internal standards (area) (i)
280-2143-1	Q3-PF-3-1-0.0** Q3-PF-3-1-0.0FD FB-PARCELS-032910 EB-PARCELS-032910	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Polynuclear Aromatic Hydrocarbons - Laboratory Blank Data Qualification Summary - SDG 280-2143-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Polynuclear Aromatic Hydrocarbons - Equipment Blank Data Qualification Summary - SDG 280-2143-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Polynuclear Aromatic Hydrocarbons - Field Blank Data Qualification Summary - SDG 280-2143-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B/4

LDC #: 23104A2b
SDG #: 280-2143-1
Laboratory: Test America

Date: 5/13/10
Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [signature]

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/06/10
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	%RSD
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 25%
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	A	LCS
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	SW	
XI.	Target compound identification	A	Not reviewed for Stage 2B validation.
XII.	Compound quantitation/CRQLs	A	Not reviewed for Stage 2B validation.
XIII.	Tentatively identified compounds (TICs)	N	Not reviewed for Stage 2B validation.
XIV.	System performance	A	Not reviewed for Stage 2B validation.
XV.	Overall assessment of data	A	
XVI.	Field duplicates	SW	D = 1, 2
XVII.	Field blanks	ND	FB = 3 EB = 4

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: ** Indicates sample underwent State 4 validation

1	Q3-PF-3-1-0.0** S	11	MB280-10254/1-A	21		31	
2	Q3-PF-3-1-0.0FD	12	MB280-10253/1-A	22		32	
3	FB-PARCELS-032910 W	13		23		33	
4	EB-PARCELS-032910	14		24		34	
5	Q3-PF-3-1-0.0MS S	15		25		35	
6	Q3-PF-3-1-0.0MSD	16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

LDC #: 23104 A26
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVG
2nd Reviewer: ~

Method: Semivolatiles (EPA SW 846 Method 8270C)

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

LDC #: 23104A2b
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JV6
2nd Reviewer: V

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

VALIDATION FINDINGS WORKSHEET

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

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

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

COMPNDL

LDC #: 23104 A2b
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Recovery

Reviewer: JVG
2nd Reviewer: [illegible]

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

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

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

#	Date	Sample ID	Surrogate	%R (Limits)	Qualifications
		2	NBZ	42 (50-120)	No qual (only 1 out)
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
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				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

* QC limits are advisory

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

LDC #: 23104A26
SDG #: Su Cmp

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: JVG
2nd Reviewer:

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

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

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

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		5/6	GGG	397 (52-120)	447 (52-120)	( )	1	No qual (LCS in)
			HHH	320 (54-120)	363 (54-120)	( )		
			LLL	157 (52-120)	191 (52-120)	( )		
			KKK	256 (55-120)	289 (55-120)	( )		
			JJJ	46 (54-120)	( )	( )		(MSD in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

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

LDC #: 23104 A 26
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Internal Standards

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

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

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

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

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

#	Date	Sample ID	Internal Standard	Area (Limits)	RT (Limits)	Qualifications
>2%		1	PRY	374011 (820545 - 3282178)		J/R/A (i)
>2%		2		357940		
						(qual GGG, HHH, III, JJJ, KKK, LLL)
		5	PRY	292305		No qual (QC)
		6		298156		

* QC limits are advisory

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

LDC#: 23104A2b
SDG#: See cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: JV6
2nd Reviewer:

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

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

Compound Name	Conc (ug/Kg)		RPD (≤ 50%)	Diff	Diff Limits	Quals (Parent Only)
	1	2				
Phenanthrene	370U	18		352	≤370	
Pyrene	15	34		19	≤370	
Benzo(b)fluoranthene	370U	110		260	≤370	
Chrysene	370U	29		341	≤370	
Fluoranthene	370U	49		321	≤370	

LDC #: 23104 A26
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: NB
2nd Reviewer: [illegible]

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

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

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

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

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

#	Standard ID	Calibration Date	Compound (Internal Standard)	Reported RRF (50 std)	Recalculated RRF (50 std)	Reported Average RRF (Initial)	Recalculated Average RRF (Initial)	Reported %RSD	Recalculated %RSD
1	ICAL	3/18/10	Naphthalene (IS2)	1.1221	1.1221	1.1134	1.1134	3.0	3.0
	MSSD		Fluorene (IS3)	1.3445	1.3445	1.3225	1.3225	5.0	5.0
			Phenanthrene (IS4)	1.1670	1.1670	1.1292	1.1292	6.7	6.7
			Chrysene (IS5)	1.0697	1.0697	1.0065	1.0065	8.2	8.2
			Benzo(a)pyrene (IS6)	1.1044	1.1044	1.0885	1.0885	6.7	6.7

Conc IS/Cpd	Area cpd	Area IS
40/50	1966829	1402196
40/50	1609531	957696
40/50	2338313	1602894
40/50	2492854	1864283
40/50	2472315	1790944

Conc	Naphthalene	Fluorene	Phenanth	Chrysene	Benzo(a)py
4.00	1.1382	1.2049	1.2145	1.0249	0.9762
10.00	1.1444	1.2482	1.1130	1.0017	1.0038
20.00	1.1266	1.2972	1.1499	1.0484	1.0453
50.00	**1.1221**	**1.3445**	**1.1670**	**1.0697**	**1.1044**
80.00	1.0774	1.3440	1.1699	1.0741	1.1019
120.00	1.1406	1.3805	1.1804	1.0559	1.1505
160.00	1.1068	1.3878	1.0504	0.9457	1.1705
200.00	1.0507	1.3725	0.9882	0.8319	1.1554
X =	1.1134	1.3225	1.1292	1.0065	1.0885
S =	0.0335	0.0666	0.0754	0.0822	0.0728

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 # 23104A26
SDG # See Cover

VALIDATION FINDINGS WORSHEET
Continuing Calibration Results Verification

Reviewer: MK
2nd Reviewer: W

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

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

% Difference = 100 * (ave. RRF - RRF)/ave. RRF
RRF = (Ax)(Cis)/(Ais)(Cx)

Where:
ave. RRF = initial calibration average RRF
RRF = continuing calibration RRF
Ax = Area of compound
Cx = Concentration of compound
Ais = Area of associated internal standard
Cis = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Ref IS)	Average RRF (Initial RRF)	Reported (CC RRF)	Recalculated (CC RRF)	Reported %D	Recalculated %D
1	D3873	4/12/10	Naphthalene (IS2)	1.113	1.176	1.176	5.6	5.6
			Fluorene (IS3)	1.323	1.380	1.380	4.3	4.3
			Phenanthrene (IS4)	1.129	1.184	1.184	4.8	4.8
			Chrysene (IS5)	1.007	1.089	1.089	8.2	8.2
			Benzo(a)pyrene (IS6)	1.089	1.178	1.178	8.2	8.2
2								
3								

	CCV1		CCV2		CCV3	
Compound	Area Cpd	Area IS	Area Cpd	Area IS	Area Cpd	Area IS
Naphthalene	3148673	1338693				
Fluorene	2644619	958332				
Phenanthrene	3836885	1620877				
Chrysene	4002705	1837231				
Benzo(a)pyrene	3866113	1641089				

LDC #: 23104 A2b
SDG #: Sre Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Reviewer: JVL
2nd reviewer: [illegible]

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

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

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: #1

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Nitrobenzene-d5	100	52.6	53	53	0
2-Fluorobiphenyl	↓	64.6	65	65	↓
Terphenyl-d14	↓	89.0	89	89	↓
Phenol-d5					
2-Fluorophenol					
2,4,6-Tribromophenol					
2-Chlorophenol-d4					
1,2-Dichlorobenzene-d4					

Sample ID: _____

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

Sample ID: _____

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

LDC #: 23104A26
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: JV6
2nd Reviewer: [signature]

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

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

% Recovery = 100 * (SSC - SC)/SA

Where: SSC = Spiked sample concentration; SA = Spike added; SC = Sample concentation

RPD = I MSC - MSC I * 2/(MSC + MSDC)

MSC = Matrix spike concentration; MSDC = Matrix spike duplicate concentration

MS/MSD samples: 5/6

Compound	Spike Added (ug/kg)		Sample Concentration (ug/kg)	Spiked Sample Concentration (ug/kg)		Matrix Spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	-------	MS	MSD	Reported	Recalc	Reported	Recalc	Reported	Recalculated
Phenol											
N-Nitroso-di-n-propylamine											
4-Chloro-3-methylphenol											
Acenaphthene	3000	3010	0	1950	2260	65	65	75	75	15	15
Pentachlorophenol											
Pyrene	3000	3010	15	2680	3010	89	89	99	99	12	12

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

LDC #: 23104A26
SDG #: See Cover

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

Page: 1 of 1
Reviewer: MC
2nd Reviewer:

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

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

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

RPD = | LCSC - LCSDC | * 2/(LCSC + LCSDC) LCSC = Laboraotry control sample concentration LCSDC = Laboratory control sample duplicate concentration

LCS/LCSD samples: LCS 280-102547/2-A

Compound	Spike Added (ug/kg)		Spike Concentration (ug/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc	Reported	Recalc	Reported	Recalculated
Phenol										
N-Nitroso-di-n-propylamine										
4-Chloro-3-methylphenol										
Acenaphthene	2650	NA	1970	NA	74	74				
Pentachlorophenol										
Pyrene	2650		2600		98	98				

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

LDC #: 23044 A26
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
Reviewer: MG
2nd reviewer: ~

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

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

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

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

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

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

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

V_i = Volume of extract injected in microliters (ul)

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

Df = Dilution Factor.

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

2.0 = Factor of 2 to account for GPC cleanup

Example:

Sample I.D. 2, UU

Conc. = $\frac{(19937)(40)(1)(1000)(\quad)}{(1357121)(1.1292)(30.2\,g)(0.93)(\quad)}$

= 18.5 ug/kg

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

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2010 Parcels, Henderson, Nevada

Collection Date: April 8, 2010

LDC Report Date: May 17, 2010

Matrix: Soil/Water

Parameters: Polynuclear Aromatic Hydrocarbons

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2306-1

Sample Identification

S3-PG-2-0.0**
FB-PARCELS_032910
EB-04082010-PARCELG
S3-PG-2-0.0MS
S3-PG-2-0.0MSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 3 soil samples and 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Polynuclear Aromatic Hydrocarbons.

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).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

Samples indicated by a double asterisk on the front cover underwent a Stage 4 review. A Stage 2B review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Stage 2B criteria since this review is based on QC data.

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

Percent relative standard deviations (%RSD) were less than or equal to 30.0% for all compounds.

Average relative response factors (RRF) for all compounds were within method and validation criteria

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

Percent differences (%D) between the initial calibration RRF and the continuing calibration RRF were within the method criteria of less than or equal to 20.0% for calibration check compounds (CCCs) and 25.0% for all other compounds.

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

All of the continuing calibration relative response factors (RRF) were within method and validation criteria

V. Blanks

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

Sample EB-04082010-PARCELG was identified as an equipment blank. No polynuclear aromatic hydrocarbon contaminants were found in this blank.

Sample FB-PARCELS_032910 was identified as a field blank. No polynuclear aromatic hydrocarbon contaminants were found in this blank.

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

All target compound identifications were within validation criteria for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

XII. Project Quantitation Limit

All project quantitation limits were within validation criteria for samples on which a Stage 4 review was performed.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2306-1	All compounds reported below the PQL.	J (all detects)	A

Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

XIII. Tentatively Identified Compounds (TICs)

Tentatively identified compounds were not reported by the laboratory.

XIV. System Performance

The system performance was acceptable for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

XV. Overall Assessment

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

XVI. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Polynuclear Aromatic Hydrocarbons - Data Qualification Summary - SDG 280-2306-1

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2306-1	S3-PG-2-0.0** FB-PARCELS_032910 EB-04082010-PARCELG	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Polynuclear Aromatic Hydrocarbons - Laboratory Blank Data Qualification Summary - SDG 280-2306-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Polynuclear Aromatic Hydrocarbons - Equipment Blank Data Qualification Summary - SDG 280-2306-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Polynuclear Aromatic Hydrocarbons - Field Blank Data Qualification Summary - SDG 280-2306-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B/4

LDC #: 23104B2a b
SDG #: 280-2306-1
Laboratory: Test America

Date: 5/13/10
Page: 1 of 1
Reviewer: JV
2nd Reviewer: ~

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/08/10
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	2 RSD
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 25%
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	A	
VIII.	Laboratory control samples	A	LCS
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	A	Not reviewed for Stage 2B validation.
XII.	Compound quantitation/CRQLs	A	Not reviewed for Stage 2B validation.
XIII.	Tentatively identified compounds (TICs)	N	Not reviewed for Stage 2B validation.
XIV.	System performance	A	Not reviewed for Stage 2B validation.
XV.	Overall assessment of data	A	
XVI.	Field duplicates	N	
XVII.	Field blanks	ND	FB = 2 EB = 3

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: ** Indicates sample underwent State 4 validation

Soil + Water

1	S3-PB-2-0.0**	S	11	MB 280-10851/1-A	21		31		
2	FB-PARCELS_032910	W	12	MB 280-10934/2-A	22		32		
3	EB-04082010-PARCELG		13		23		33		
4	S3-PB-2-0.0MS	S	14		24		34		
5	S3-PB-2-0.0MSD		15		25		35		
6			16		26		36		
7			17		27		37		
8			18		28		38		
9			19		29		39		
10			20		30		40		

LDC #: 27104 B26
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: MG
2nd Reviewer: VV

Method: Semivolatiles (EPA SW 846 Method 8270C)

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

LDC #: 23164 B26
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: MV
2nd Reviewer: W

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

VALIDATION FINDINGS WORKSHEET

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

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

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

LDC #: 73104B26
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: MG
2nd Reviewer: [signature]

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

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

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

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

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

#	Standard ID	Calibration Date	Compound (Internal Standard)	Reported RRF (50 std)	Recalculated RRF (50 std)	Reported Average RRF (Initial)	Recalculated Average RRF (Initial)	Reported %RSD	Recalculated %RSD
1	ICAL	4/13/10	Naphthalene (IS2)	1.0312	1.0312	0.9822	0.9822	11.7	11.7
	MSSK		Fluorene (IS3)	1.3050	1.3050	1.2461	1.2462	11.2	11.2
			Phenanthrene (IS4)	1.0729	1.0729	1.0336	1.0336	13.4	13.4
			Chrysene (IS5)	1.0610	1.0610	1.0410	1.0410	10.7	10.7
			Benzo(a)pyrene (IS6)	1.1036	1.1036	1.0281	1.0281	5.7	5.7

Conc IS/Cpd	Area cpd	Area IS
40/50	1021070	792159
40/50	789238	483840
40/50	1134473	845901
40/50	1301240	981110
40/50	1376307	997687

Conc	Naphthalene	Fluorene	Phenanth	Chrysene	Benzo(a)py
4.00	1.1409	1.3747	1.2180	1.1807	0.9292
10.00	1.0702	1.3919	1.1707	1.1392	1.0099
20.00	1.0728	1.3882	1.1386	1.1556	1.0972
50.00	**1.0312**	**1.3050**	**1.0729**	**1.0610**	**1.1036**
80.00	0.9598	1.2199	1.0070	1.0154	1.0631
120.00	0.9097	1.1599	0.9388	0.9617	1.0333
160.00	0.8529	1.0870	0.8778	0.9268	0.9979
200.00	0.8202	1.0426	0.8449	0.8874	0.9906
X =	0.9822	1.2462	1.0336	1.0410	1.0281
S =	0.1148	0.1395	0.1388	0.1110	0.0587

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 # 23104 B2b
SDG # See Cover

VALIDATION FINDINGS WORSHEET
Continuing Calibration Results Verification

Reviewer: JV6
2nd Reviewer:

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

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

% Difference = 100 * (ave. RRF - RRF)/ave. RRF
RRF = (Ax)(Cis)/(Ais)(Cx)

Where:
ave. RRF = initial calibration average RRF
RRF = continuing calibration RRF
Ax = Area of compound
Cx = Concentration of compound
Ais = Area of associated internal standard
Cis = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Ref IS)	Average RRF (Initial RRF)	Reported (CC RRF)	Recalculated (CC RRF)	Reported %D	Recalculated %D
1	K2738	4/15/10	Naphthalene (IS2)	0.982	0.956	0.956	2.6	2.6
			Fluorene (IS3)	1.246	1.233	1.233	1.1	1.1
			Phenanthrene (IS4)	1.034	1.013	1.013	2.0	2.0
			Chrysene (IS5)	1.041	1.029	1.029	1.1	1.1
			Benzo(a)pyrene (IS6)	1.028	1.047	1.047	1.9	1.9
2								
3								

	CCV1		CCV2		CCV3	
Compound	Area Cpd	Area IS	Area Cpd	Area IS	Area Cpd	Area IS
Naphthalene	1474236	770758				
Fluorene	1162445	471515				
Phenanthrene	1685735	831764				
Chrysene	2026913	984781				
Benzo(a)pyrene	2337667	1116096				

LDC #: 23104 B26
SDG #: Sre Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

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

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

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

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: #1

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Nitrobenzene-d5	100	86.3	86	86	0
2-Fluorobiphenyl	↓	84.2	84	84	↓
Terphenyl-d14	↓	86.0	86	86	↓
Phenol-d5					
2-Fluorophenol					
2,4,6-Tribromophenol					
2-Chlorophenol-d4					
1,2-Dichlorobenzene-d4					

Sample ID:

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

Sample ID:

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

LDC #: 23104 B2b
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

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

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

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

% Recovery = 100 * (SSC - SC)/SA

Where: SSC = Spiked sample concentration; SA = Spike added; SC = Sample concentation

RPD = I MSC - MSC I * 2/(MSC + MSDC)

MSC = Matrix spike concentration; MSDC = Matrix spike duplicate concentration

MS/MSD samples: 4/5

Compound	Spike Added (ug/kg)		Sample Concentration (ug/kg)	Spiked Sample Concentration (ug/kg)		Matrix Spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	------	MS	MSD	Reported	Recalc	Reported	Recalc	Reported	Recalculated
Phenol											
N-Nitroso-di-n-propylamine											
4-Chloro-3-methylphenol				2290							
Acenaphthene	2800	2790	0	~~2800~~	2390	87	87	86	86	5	4
Pentachlorophenol											
Pyrene	2800	2790	25	2390	2960	84	84	105	105	21	21

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

LDC #: 23164 B2b
SDG #: See Cover

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

Reviewer: JM
2nd Reviewer: [illegible]

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

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

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

RPD = | LCSC - LCSDC | * 2/(LCSC + LCSDC) LCSC = Laboratory control sample concentration LCSDC = Laboratory control sample duplicate concentration

LCS/LCSD samples: LCS 280-10451/2-A

Compound	Spike Added (ug/kg)		Spike Concentration (ug/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc	Reported	Recalc	Reported	Recalculated
Phenol										
N-Nitroso-di-n-propylamine										
4-Chloro-3-methylphenol										
Acenaphthene	2650	NA	2350	NA	89	89				
Pentachlorophenol										
Pyrene	2650	"	2480	"	94	94				

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

LDC #: 23104 B26
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

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

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

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

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

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

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

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

V_i = Volume of extract injected in microliters (ul)

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

Df = Dilution Factor.

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

2.0 = Factor of 2 to account for GPC cleanup

Example:

Sample I.D. #1, MW:

Conc. = $\frac{(14008)(40)(1)(1000)(\quad)}{(1.0336)(925187)(30.0g)(0.945)(\quad)}$

= 20.7

≈ 21 ug/kg

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

Tronox LLC Facility,2010 Parcels, Henderson, Nevada
Data Validation Reports
LDC #23104

Arsenic

LDC

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, 2010 Parcels, Henderson, Nevada

Collection Date: April 6, 2010

LDC Report Date: May 18, 2010

Matrix: Soil/Water

Parameters: Arsenic

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2143-1

Sample Identification

P3-PF-2-1-0.0**
P3-PF-2-1-0.0FD
FB-PARCELS-032910
EB-PARCELS-032910
P3-PF-2-1-0.0MS
P3-PF-2-1-0.0MSD
EB-PARCELS-032910MS
EB-PARCELS-032910MSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 4 soil samples and 4 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Methods 6020 for Arsenic.

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).

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.

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

Samples indicated by a double asterisk on the front cover underwent a Stage 4 review. A Stage 2B review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Stage 2B criteria since this review is based on QC data.

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. ICPMS Tune

The mass calibration was within 0.1 AMU and the percent relative standard deviation (%RSD) was less than or equal to 5% .

III. Calibration

An initial calibration was performed.

The frequency and analysis criteria of the initial calibration verification (ICV) and continuing calibration verification (CCV) were met.

IV. Blanks

Method blanks were reviewed for each matrix as applicable. No arsenic was found in the initial, continuing and preparation blanks.

Sample EB-PARCELS-032910 was identified as an equipment blank. No arsenic was found in this blank.

Sample FB-PARCELS-032910 was identified as a field blank. No arsenic was found in this blank.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. Matrix Spike Analysis

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.

VII. Duplicate Sample Analysis

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable.

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

All internal standard percent recoveries (%R) were within QC limits.

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met.

XII. Sample Result Verification and Project Quantitation Limit

All sample result verifications were acceptable for samples on which a Stage 4 review was performed.

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2143-1	All analytes reported below the PQL.	J (all detects)	A

Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

Samples P3-PF-2-1-0.0** and P3-PF-2-1-0.0FD were identified as field duplicates. No metals were detected in any of the samples with the following exceptions:

Compound	Concentration (mg/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	P3-PF-2-1-0.0**	P3-PF-2-1-0.0FD				
Arsenic	3.1	3.2	3 (≤50)	-	-	-

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Arsenic - Data Qualification Summary - SDG 280-2143-1

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2143-1	P3-PF-2-1-0.0** P3-PF-2-1-0.0FD FB-PARCELS-032910 EB-PARCELS-032910	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Arsenic - Laboratory Blank Data Qualification Summary - SDG 280-2143-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Arsenic - Equipment Blank Data Qualification Summary - SDG 280-2143-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2010 Parcels, Henderson, Nevada
Arsenic - Field Blank Data Qualification Summary - SDG 280-2143-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B/4

LDC #: 23104A4
SDG #: 280-2143-1
Laboratory: Test America

Date: 5-10-10
Page: 1 of 1
Reviewer: MG
2nd Reviewer: ✓

METHOD: Arsenic (EPA SW 846 Method 6020)

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: 4-6-10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	MS/MSD
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	not utilized
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	A	Not reviewed for Stage 2B validation.
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	SW	D= 1+2
XV	Field Blanks	ND	FB= 3 EB= 4

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: ** Indicates sample underwent State 4 validation

1	P3-PF-2-1-0.0** S	11		21		31		
2	P3-PF-2-1-0.0FD	12		22		32		
3	FB-PARCELS-032910 W	13		23		33		
4	EB-PARCELS-032910	14		24		34		
5	P3-PF-2-1-0.0MS S	15		25		35		
6	P3-PF-2-1-0.0MSD	16		26		36		
7	EB-PARCELS-032910MS W	17		27		37		
8	EB-PARCELS-032910MSD	18		28		38		
9	PBS	19		29		39		
10	PBW	20		30		40		

Notes: _____

LDC #: 23104A4
SDG #: 280-2143-1

VALIDATION FINDINGS CHECKLIST

Reviewer: MG
2nd Reviewer: ~

Method: Metals (EPA SW 846 Method 6010/7000/6020)

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Calibration				
Were all isotopes in the tuning solution mass resolution within 0.1 amu?	✓			
Were %RSD of isotopes in the tuning solution < 5%?	✓			
Were all instruments calibrated daily, each set-up time?	✓			
Were the proper number of standards used?	✓			
Were all initial and continuing calibration verification %Rs within the 90-110% (80-120% for mercury and 85-115% for cyanide) QC limits?	✓			
Were all initial calibration correlation coefficients > 0.995?	✓			
III. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
IV. ICP Interference Check Sample				
Were ICP interference check samples performed daily?	✓			
Were the AB solution percent recoveries (%R) with the 80-120% QC limits?	✓			
IV. Matrix spike/Matrix spike duplicates				
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.	✓			
Were the MS/MSD or duplicate relative percent differences (RPD) ≤ 20% for waters and ≤ 35% for soil samples? A control limit of +/- RL(+/-2X RL for soil) was used for samples that were ≤ 5X the RL, including when only one of the duplicate sample values were < 5X the RL.	✓			
V. Laboratory control samples				
Was an LCS anaylzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the 80-120% QC limits for water samples and laboratory established QC limits for soils?	✓			

LDC #: 23104A4
SDG #: 280-2143-1

VALIDATION FINDINGS CHECKLIST

Reviewer: MG
2nd Reviewer: ~

Validation Area	Yes	No	NA	Findings/Comments
VI. Furnace Atomic Absorption QC				
If MSA was performed, was the correlation coefficients > 0.995?			✓	
Do all applicable analysies have duplicate injections? (Level IV only)			✓	
For sample concentrations > RL, are applicable duplicate injection RSD values < 20%? (Level IV only)			✓	
Were analytical spike recoveries within the 85-115% QC limits?			✓	
VII. ICP Serial Dilution				
Was an ICP serial dilution analyzed if analyte concentrations were > 50X the IDL?	✓			
Were all percent differences (%Ds) < 10%?	✓			
Was there evidence of negative interference? If yes, professional judgement will be used to qualify the data.		✓		
VIII. Internal Standards (EPA SW846 Method 6020)				
Were all the percent recoveries (%R) within the 30-120% of the intensity of the internal standard in the associated initial calibration?	✓			
If the %Rs were outside the criteria, was a reanalysis performed?			✓	
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
X. Sample Result Verification				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
XI. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
XII. Field duplicates				
Field duplicate pairs were identified in this SDG.	✓			
Target analytes were detected in the field duplicates.	✓			
XIII. Field blanks				
Field blanks were identified in this SDG.	✓			
Target analytes were detected in the field blanks.		✓		

LDC#: 23104A4
SDG#: 280-2143-1

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

METHOD: Metals (EPA Method 6010B/6020/7000)

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

Analyte	Concentration (mg/kg) 1	Concentration (mg/kg) 2	(≤50) RPD	(mg/Kg) Difference	(mg/Kg) Limits	Qualifications (Parent Only)
Arsenic	3.1	3.2	3			

V:\FIELD DUPLICATES\FD_inorganic\263104A4.wpd

LDC #: 23104A4
SDG #: 280-2143-1

VALIDATION FINDINGS WORKSHEET
Initial and Continuing Calibration Calculation Verification

Reviewer: MG
2nd Reviewer:

METHOD: Trace Metals (EPA SW 846 Method 6010/6020/7000)

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

%R = Found x 100 / True

Where, Found = concentration (in ug/L) of each analyte measured in the analysis of the ICV or CCV solution
True = concentration (in ug/L) of each analyte in the ICV or CCV source

Standard ID	Type of Analysis	Element	Found (ug/L)	True (ug/L)	Recalculated %R	Reported %R	Acceptable (Y/N)
	ICP (Initial calibration)						
	GFAA (Initial calibration)						
	CVAA (Initial calibration)						
	ICP (Continuing calibration)						
	GFAA (Continuing calibration)						
	CVAA (Continuing calibration)						
1925 ICV	ICP/MS (Initial calibration)	As	40.57	40.0	101	101	Y
0144 CCV	ICP/MS (Continuing calibation)	As	51.89	50.0	104	104	↓

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 #: 23104A4
SDG #: 280-2143-1

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

Reviewer: MG
2nd Reviewer:

METHOD: Trace Metals (EPA SW 846 Method 6010/7000)

Percent recoveries (%R) for an ICP interference check sample, a laboratory control sample and a matrix spike sample were recalculated using the following formula:

$\%R = \frac{Found}{True} \times 100$ Where, Found = Concentration of each analyte measured in the analysis of the sample. For the matrix spike calculation, Found = SSR (spiked sample result) - SR (sample result).
True = Concentration of each analyte in the source.

A sample and duplicate relative percent difference (RPD) was recalculated using the following formula:

$RPD = \frac{|S-D|}{(S+D)/2} \times 100$ Where, S = Original sample concentration
D = Duplicate sample concentration

An ICP serial dilution percent difference (%D) was recalculated using the following formula:

$\%D = \frac{|I-SDR|}{I} \times 100$ Where, I = Initial Sample Result (mg/L)
SDR = Serial Dilution Result (mg/L) (Instrument Reading x 5)

Sample ID	Type of Analysis	Element	Found / S / I (units)	True / D / SDR (units)	Recalculated %R / RPD / %D	Reported %R / RPD / %D	Acceptable (Y/N)
1958 ICSAB	ICP Interference check	As	104.20 (ug/L)	100. (ug/L)	104	104	Y
0155 LCS	Laboratory control sample	As	19.63 (mg/kg)	20.0 (mg/kg)	98	98	
0207 5	Matrix spike	As	(SSR-SR) 18.23 (mg/kg)	18.5 (mg/kg)	99	98	
0207 / 0210 5/6	Duplicate	As	21.34 (mg/kg)	23.14 (mg/kg)	8	8	
0158 / 0201 1	ICP serial dilution	As	3.115 (mg/kg)	3.096 (mg/kg)	* 0.61	0.53	

Comments: Refer to appropriate worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.
* > 10%D; both in limit; no qual.

LDC #: 23104A4
SDG #: 280-2143-1

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer: MG
2nd reviewer: W

METHOD: Trace Metals (EPA SW 846 Method 6010/7000)

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

(Y) N N/A Have results been reported and calculated correctly?
(Y) N N/A Are results within the calibrated range of the instruments and within the linear range of the ICP?
(Y) N N/A Are all detection limits below the CRDL?

Detected analyte results for #1, As were recalculated and verified using the following equation:

Concentration = $\frac{(RD)(FV)(DIl)}{(In.\ Vol.)(\%S)}$

RD = Raw data concentration
FV = Final volume (ml)
In. Vol. = Initial volume (ml) or weight (G)
Dil = Dilution factor
%S = Decimal percent solids

Recalculation:

$$\frac{(6.79\ \mu g/L)(0.100\ L)(5)}{1.09\ g\ \text{wet weight}} = 3.115\ \frac{\mu g}{g}\ \text{or}\ \frac{mg}{kg}$$

Sample ID	Analyte	Reported Concentration (mg/kg)	Calculated Concentration (mg/kg)	Acceptable (Y/N)
1	As	3.1	3.1	Y