



**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

June 30, 2010

SUBJECT: Tronox LLC Facility, PCS, Henderson, Nevada,  
Data Validation

Dear Ms. Arnold,

Enclosed is the final validation report for the fraction listed below. This SDG was received on June 25, 2010. Attachment 1 is a summary of the samples that were reviewed for each analysis.

**LDC Project # 23453:**

<b><u>SDG #</u></b>	<b><u>Fraction</u></b>
091003729	Asbestos

The data validation was performed under Stage 2B 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 Inorganic Data Review, October 2004

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

Sincerely,

Erlinda T. Rauto  
Operations Manager/Senior Chemist

**EDD Stage 2B/4 LDC #23453 (Tronox LLC-Northgate, Henderson NV / Tronox PCS)**

LDC	SDG#	DATE REC'D	(3) DATE DUE	Asb. (540-R-97-028)	Week 1																														
					W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	
Matrix: Water/Soil																																			
A	091003729	06/25/10	07/02/10	0 4																															
<b>Total</b>	<b>T/LR</b>				0	4	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	4		

EDD CHECKLIST

LDC #: 23453  
 SDG #: 091003729

Page: 1 of 1  
 Reviewer: JE  
 2nd Reviewer: BC

Tronox Northgate Henderson Worksheet

EDD Area	Yes	No	NA	Findings/Comments
<b>I. Completeness</b>				
Is there an EDD for the associated Tronox validation report?	X			
<b>II. EDD Qualifier Population</b>				
Were all qualifiers from the validation report populated into the EDD?	X			
<b>III. EDD Lab Anomalies</b>				
Were EDD anomalies identified?	X			
If yes, were they corrected or documented for the client?	X			See EDD_discrepancy_form_LDC23453_062910.doc
<b>IV. EDD Delivery</b>				
Was the final EDD sent to the client?	X			

**Tronox LLC Facility, PCS, Henderson, Nevada  
Data Validation Reports  
LDC #23453**

Asbestos

**LDC**

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

**Project/Site Name:** Tronox LLC Facility, PCS, Henderson, Nevada  
**Collection Date:** April 20, 2010  
**LDC Report Date:** June 28, 2010  
**Matrix:** Soil  
**Parameters:** Asbestos  
**Validation Level:** Stage 2B  
**Laboratory:** EMSL Analytical, Inc.  
**Sample Delivery Group (SDG):** 091003729

**Sample Identification**

SA77-0.33BPC  
SA77-0.33BPC\_FD  
SSAO5-01-0.00BPC\_FD  
SSAO5-01-0.00BPC

## Introduction

This data review covers 4 soil samples listed on the cover sheet. The analyses were per EPA Method 540-R-97-028 for Asbestos.

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.

Blank results are summarized in Section III.

Field duplicates are summarized in Section VII.

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

The following are definitions of the data qualifiers:

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

## I. Technical Holding Times

No holding time requirement is specified for asbestos.

No cooler temperature requirement is specified for asbestos.

## II. Calibration

A NIST standard reference material containing Chrysotile, Amosite, and Crocidolite asbestos was analyzed. The calibration identified the proper constituents.

## III. Blanks

The blank analyses showed no asbestos contamination.

No field blanks were identified in this SDG.

## IV. Duplicates

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

## V. Sample Result Verification

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 091003729	All analytes reported below the PQL.	J (all detects)	A

## VI. Overall Assessment

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

## VII. Field Duplicates

Samples SA77-0.33BPC and SA77-0.33BPC\_FD and samples SSAO5-01-0.00BPC\_FD and SSAO5-01-0.00BPC were identified as field duplicates. No asbestos was detected in any of the samples.



**Tronox LLC Facility, PCS, Henderson, Nevada  
Asbestos - Data Qualification Summary - SDG 091003729**

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
091003729	SA77-0.33BPC SA77-0.33BPC_FD SSAO5-01-0.00BPC_FD SSAO5-01-0.00BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (sp)

**Tronox LLC Facility, PCS, Henderson, Nevada  
Asbestos - Laboratory Blank Data Qualification Summary - SDG 091003729**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada  
Asbestos - Field Blank Data Qualification Summary - SDG 091003729**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23453A6  
 SDG #: 091003729  
 Laboratory: EMSL Analytical, Inc.

Date: 6/28/10  
 Page: 1 of 1  
 Reviewer: [Signature]  
 2nd Reviewer: [Signature]

METHOD: Asbestos (Draft Modified Elutriator Method adopted from EPA Method 540-R-97-028)

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: 4/20/10
II.	Calibration verification	A	
III.	Blanks	A	filter blank, TB
IV.	Matrix Duplicates	N	client specified.
V.	Sample result verification	N	
VI.	Overall assessment of data	A	
VII.	Field duplicates	ND	(1,2) (3,4)
VIII.	Field blanks	N	

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

Validated Samples: 501

1	SA77-0.33BPC	11		21		31	
2	SA77-0.33BPC_FD	12		22		32	
3	SSAO5-01-0.00BPC_FD	13		23		33	
4	SSAO5-01-0.00BPC	14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: \_\_\_\_\_  
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