



EMS Laboratories
117 W. Bellevue Drive
Pasadena, CA 91105

NARRATIVE

July 8, 2010

Derrick Willis
Tronox LLC-Henderson
560 West Lake Mead
Henderson, NV 89015

SDG/EMS# 137822
Project: 2027.001, Tronox LLC Henderson,
560 West Lake Mead Drive, Henderson, NV
Client COC ID: 02027.01.2127

REFERENCE:	DAS Case No. 0769F	TDD No.: 07-10-0012
	Task No. 0361	P. O. No.: 0063941
	Tronox Project# 10203.01.02	NGE Tracking# 03
	AUI Task# 6	

EMS REPORT NO.: 137822

The elutriator that is used in this task was constructed at EMS Laboratories and has a nominal 4 inch diameter stainless steel tube for the body of the elutriator. The drawing of the elutriator in the document EPA/540/R97/028 assumes an inner diameter of 4 inches for the calculation of the desired flow rate in the elutriator but the EMS elutriator has an inner diameter of about one eighth inch less than that. The EMS elutriator uses a basic flow rate of 1460 ml per minute instead of the 1560 ml per minute to adjust for the difference in diameter.

Two serious interferences were observed when the Tronox soil samples were subjected to the elutriation and in the subsequent preparation of the grids used for transmission electron microscope (TEM) viewing. The first interference manifested itself as a very low rate of dust collection of material on the filter that was to be used for TEM examination. The second problem was that it was very difficult to prepare good quality grids because of breakage in the carbon film.

The top of the elutriator contains two filters that connect to the pump that pulls the air through the vertical elutriator. Both filters are nominally 25 millimeters. One takes the major flow of the air and dust through the tube and the other is used to prepare a filter for examination in the TEM. This filter that is termed the IST filter is collected from a tube that extends down from the top openings to the level where the body of the elutriator has the nominal 4 inch diameter. The purpose of this tube is to collect a sample on a 25 mm diameter filter that represents the particle size distribution at the top of the uniform column before it is disturbed by the reduction of the cross sectional area that occurs at the top of the elutriator. The other takes the majority of the flow of air and collects the dust also on a 25 millimeter filter. There are two filters of each type so that one filter of each is always in place when the filters are changed.





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The flow velocity in the IST tube has to be at least that in body of the elutriator to carry the particles upward. A flow rate higher than the minimum will not have a significant effect since the size of the particles going up the elutriator is already determined before the airstream reaches the IST tube. However, if some force other than gravity acts on the particles there can be a problem. It is found in the EMS elutriator that the IST filters have a significant static charge after the sample is collected. It is also found that an air flow velocity in excess of the velocity in the body of the elutriator is necessary to get a deposit on the IST filter that weighs nearly what is expected. The additional force exerted by the static electricity on particles of the same charge would prevent them from reaching the surface of the filter. They cannot just build

up in the region near the surface but instead one would expect them to form aggregates and drop back down the tube.

The weight of the deposit on each filter should divide according to the total airflow through each, i.e., if 90% of the air goes through one filter and 10% through the other then in the same time period one would expect to have nine times the weight of the other. In actuality this is generally not the case. In the original draft of the method in 2003 it is noted that a significantly higher flow velocity is required in the IST tube to get the weight predicted by the formula relating the weight to each airflow. There appear to be several reasons for this. One that was suggested in draft of the modified elutriator method is that leaks which are small compared to 1400 or 1500 ml per minute are not small in the IST tube that carries only 5% of the total flow. Accordingly, the original draft suggested using airflow somewhat higher than the air velocity in the body. The air leaks have been minimized and do not appear to be a major cause of the fact that the airflow must be significantly higher in the IST tube in order to get satisfactory deposits on the IST filter. The factors which appear to be important with respect to getting a good filter are the soil chemistry and also the static charge that builds up on the filters.

.The particles in the air stream move upward because the airflow creates an upward force that is balanced by gravity. If there is a force other than gravity such as a repulsive static electrical force as the particle approaches the filter, then the larger particles may not reach the surface of the filter. The particles that do not reach the filter must sooner or later go back down the tube or collect on the sides. The apparent fate is that they collect other particles and the aggregates fall down the tube undergoing additional aggregation as they fall. There are numerous observations that support this hypothesis.

The problem also appears to be enhanced by soil chemistry. EMS has experienced problems in the past when elutriating alkaline materials. Alkaline materials are particularly bad when collecting the sample on polycarbonate filters. Apparently alkalinity somehow interferes with the particles sticking to the surface. MCE filters under the same conditions are less affected as far as particle sticking is concerned as evidenced by experiments where dust was collected alternately on MCE and polycarbonate filters. The EMS chemistry department was given a few randomly chosen Tronox samples for determination of pH and found alkalinity in some as high as the 10 to 11 range.



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Alkaline dust also is a problem at the stage in the process in which samples on the polycarbonate filters were transferred to a carbon film on a grid for examination in the TEM. The grids prepared from alkaline dust samples when viewed in the TEM often show loss of particles and cracking of the film when polycarbonate filters are used.

The alkaline dust problem is not new and EMS has in its elutriator SOP a suggestion for using MCE filters for dealing with this interference. Accordingly, EMS prepared a few of the NGEM samples on MCE filters to show that it corrected the problem. The tradeoff is that the

MCE filters do not have the good humidity stability that the polycarbonate has so precautions must be taken to get the correct weight of deposit. On June 11th EMS was informed that NGEM did not want to use MCE filters. These samples were already prepared and analyzed prior to this decision. Use of MCE filters for samples was terminated.

The only solution for the static problem that has been successful is using increased flow rates in the IST tube, up to 130 ml/min and occasionally 138 as contrasted with a theoretical flow rate in the mid-seventies. In the past EMS has found a flow rate of 90 ml/minute to be appropriate for soil samples.

When the samples are analyzed in the TEM the recorded data includes the dimensions of the respirable fibers of the regulated asbestos types, namely, chrysotile, Amosite (cummingtonite/grunerite), tremolite, actinolite, crocidolite, and anthophyllite. The fibers of importance are those included in the protocol fiber classification. The width of the protocol fibers is <0.4 μm and the length is divided into two groups, 5 to 10 μm and long fibers >10 μm . The 95% Poisson Confidence interval for the observed concentration of fibers is also calculated.

Other asbestos fibers and non-asbestos fibers with protocol dimensions are noted in the counting sheets.



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 PO Box 55
 Henderson, NV 89009

Phone: (947) 375-7004

Project: Tronox LLX Henderson, 560 W. Lake Mead Dr.,
 Henderson, NV/2027.001

Customer ID: TRNX26
 Customer PO: 2027.001
 Received: 5/19/2010 09:13AM
 EMS LAB No: 137822
 Date Prepared: 6/9/2010 2:30PM
 Analysis Date: 6/10/2010 8:30AM

Report Date: July 7, 2010

Date Sampled: 5/13/2010 10:35

NIOSH 7402/ISO

DRAFT, MODIFIED ELUTRIATOR METHOD FOR THE DETERMINATION OF ASBESTOS IN SOILS AND BULK MATERIAL METHOD

EMS Laboratory Number: 137822	Mass of Respirable Dust on Fiber: 169
Customer Sample Number: SSAR6-01-0.00BPC	Area of collection filter: 385 mm ²
Minimum Level of Analysis (chrysotile): CD	Grid openings area: 0.0094 mm ²
Minimum Level of Analysis (amphibole): ADX	Grid Openings Analyzed: 94
Magnification used for fiber counting: 9,200 x	Min. Str. Length/Max Str. Diameter: >5/<0.4 microns
Aspect ratio for fiber definition: 3:1	Analyst(s): Radha Singh
Dust Generator - Total Dried Sample Weight	Soil % Moisture 9.5 %
Not Used	Air Flow Rate Through ME Opening of Dust Generator: 1370
Used in Tumbler	Air Flow Rate Through IST Opening of Dust Generator: 130
	Estimate Total Air Flow Through Elutriator: 1500

Analytical Sensitivity: 2.58E+06 Structure /g PM 10 Limit of Detection: 7.72E+06 Structure /g PM 10

(Note: Amended report per client request to reflect the EPA definition of greater than 10um and less than 0.4um)

Test For Uniformity (Chi-Square results)

Structure Class	Min ID Level Required	Counts		Density Str/mm ²	Conc. Str/g PM10	Poisson 95% Confidence Interval	
		Primary Str.	Total Str.			Lower Limit Str/g PM10	Upper Limit Str/g PM10
Asbestos Structures >5um, ≤10um	ADX/CD	0	0	0	0	0	7.72E+06
Asbestos Structures >5um, ≤10um (Chrys)	CD	0	0	0	0	0	7.72E+06
Asbestos Structures >5um, ≤10um (Amph)	ADX	0	0	0	0	0	7.72E+06
Asbestos Structure >10um (Long)	ADX/CD	0	0	0	0	0	7.72E+06
Asbestos Structure >10um (Chrys)	CD	0	0	0	0	0	7.72E+06
Asbestos Structure >10um (Amph)	ADX	0	0	0	0	0	7.72E+06
Total Protocol Asbestos Structures	ADX/CD	0	0	0	0	0	7.72E+06
Protocol Asbestos Structures (Chrys)	CD	0	0	0	0	0	7.72E+06
Protocol Asbestos Structures (Amph)	ADX	0	0	0	0	0	7.72E+06
Total Protocol Non Asbestos Structures	NAM	0	0	0	0	0	7.72E+06


 Approved by Technical Director

Copy

85

Count (Page of) NIOSH 7402/ISO

Report number : 137822
Sample number: SSAPC-01-0.00BPC
File name: Northgate
Sample Description: 169 mg

Filter Type: MCE 385 mm2
Date Sample was Run: 6/9/10

Magnification: 9,200 X

start prep: 1200 pm
Stop prep: 230 pm

Preparation date: 6/9/10 By JAP
Analysis date: 6/10/10 By RJ
(A): ADX, ADQ

Grid opening dimension: 0.0094 mm²
Level of Analysis: (C): CD, CDX

Grid loading moderate to heavy Condition of Grid fine

Analysis - 6:30 ~ 8:30

Grid	Grid Opening	Number of structures Primary	Number of structures Total	Class	Type of Structure	Width mm	Length mm	Comments
1A	C2-3							
	C2-6							
	E23							
	E26							
	K23							
	E3-1							
	E3-4							
	F34							
	F34							
	G3-1							
	G34							
	H3-1							
	H3-4							
	K4-1							
	K4-4							
	L4-1							
	E5-1							
	E5-4							
	E5-1							
1B	C3-3							
	C3-6							
	E3-3							
	E3-6							
	F3-1							
	F3-4							
	G3-1							
	G3-4							
	H3-1							
	H3-4							
	K3-3							
	K3-6							

TEM Asbestos Structure Count (Page of)

Report number: 137822 SAMPLE NO: SSAP6-01-0.00BPC X 9,200

Grid	Grid Opening	Number of structures primary	Number of structures Total	Class	Type of Structure	Width Mm	Length Mm	Comments
1B	CU-1							
	CU-4							
	EU-1							
	EU-4							
	FU-1							
	WF							
	W-4							
	HS-1							
	HS-4							
1C	C2-3							
	E2-6							
	F2-3							
	H2-6							
	F2-3							
	I2-6							
	G2-3							
	F2-1							
	F2-4							
	G2-4							
	W3-4							
	CU-4							
	EU-1							
	EU-4							
	E4-1							
	FE4-4							
	W4-3							
	W4-6							
HS-1								
HS-4								
1D	C3-1							
	C3-4							
	E3-1							
	E3-4							
	F3-1							

Elutriator Data

Lab #: 137822

Sample ID: SSAPC-01-0.00PPC

Time air flow started: 6:00

IST Flowmeter (mL/min): 130

Date: 6-9-10

Client: Northgate

Sample weight (g): 78.3

Tumbler rpm: 45

ME Flowmeter (mL/min): 1370

Filter No.	Start Time	Tested flow rate (mL/min)	Final Filter Wt (mg)	Initial Filter Wt (mg)	Dust Weight (mg)	Time Value (min)	Avg. rate of deposition (ug/min)	Optimal time (min)
1	8:00	137	0.03430	0.02453	9.77	30	326	
2	8:30		0.03157	0.02450	7.07	15	471	
3	8:45		0.03182	0.02448	7.44	20	371	
4	9:05		0.03122	0.02477	6.45	20	323	
5	9:25		0.03083	0.02490	5.93	20	297	
6	9:45		0.02848	0.02500	3.48	20	174	
7	10:05		0.03304	0.02490	8.14	30	271	
8	10:35							
Time	8:57	9:01					Dep. Rate $\frac{mg}{min}$	Estimate
MCE-1	9:13	9:19 1/2	24.492	24.444	0.048	4	12	
-2	9:33	9:39 1/2	24.873	24.104	0.169	6 1/2	26	26
-3	9:53	10:01	24.327	24.210	0.111	6 1/2	17	25
PC-4	10:14	10:20	4.517	4.409	0.648	8	6	
MCE-5			24.434	24.250	0.154	12	13	23

prep: 6/9/10

A

138029

Moisture content

42

6-8-10

#SA111-1.00BPC Rush

dish wt. 19.23 g

samp. wt 119.81 - 19.23 = 100.58 g (initial wt.)

6:15-7:15 112.32 - 19.23 = 93.09 g

8:05-9:05 112.29 - 19.23 = 93.06 g (Final wt.)

$$\% \text{ moist.} \rightarrow 100 \times \frac{100.58 - 93.06}{93.06} = 8.08\%$$

#137822 - #SA05-0.33BPC Rush

dish wt. 31.48 g

samp. wt. 131.30 - 31.48 = 99.82 (initial wt.)

6:15-7:15 123.48 - 31.48 = 92.00

8:05-9:05 123.44 - 31.48 = 91.96 (Final wt.)

$$\% \text{ moist.} \rightarrow 100 \times \frac{99.82 - 91.96}{91.96} = 8.55\%$$

#137822 - #SSAR6-01-00BPC Rush

dish wt. 31.45 g

samp. wt. 131.28 - 31.45 = 99.83 g (initial wt.)

6:15-7:15 122.65 - 31.45 = 91.20 g

8:05 122.61 - 31.45 = 91.16 g (Final wt.)

$$\% \text{ moist.} \rightarrow 100 \times \frac{99.83 - 91.16}{91.16} = 9.51\%$$

BP



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 PO Box 55
 Henderson, NV 89009

Phone: (947) 375-7004

Project: Tronox LLX Henderson, 560 W. Lake Mead Dr.,
 Henderson, NV/2027.001

Customer ID: TRNX26
 Customer PO: 2027.001
 Received: 5/19/2010 10:05AM
 EMS LAB No: 137822
 Date Prepared: 6/8/2010 11:07AM
 Analysis Date: 6/9/2010 10AM

Report Date: July 7, 2010

Date Sampled: 5/13/2010 10:20

NIOSH 7402/ISO

DRAFT, MODIFIED ELUTRIATOR METHOD FOR THE DETERMINATION OF ASBESTOS IN SOILS AND BULK MATERIAL METHOD

EMS Laboratory Number:	137822	Mass of Respirable Dust on Fiber:	142
Customer Sample Number:	SA05-0.33BPC	Area of collection filter:	385 mm ²
Minimum Level of Analysis (chrysotile):	CD	Grid openings area:	0.0094 mm ²
Minimum Level of Analysis (amphibole):	ADX	Grid Openings Analyzed:	104
Magnification used for fiber counting:	9,200 x	Min. Str. Length/Max Str. Diameter:	>5/<0.4 microns
Aspect ratio for fiber definition:	3:1		

Analyst(s): Radha Singh

Dust Generator - Total Dried Sample Weight	Soil % Moisture	8.6 %
Not Used	Air Flow Rate Through ME Opening of Dust Generator:	1370
Used in Tumbler	Air Flow Rate Through IST Opening of Dust Generator:	130
	Estimate Total Air Flow Through Elutriator:	1500

Analytical Sensitivity: 2.77E+06 Structure /g PM 10 Limit of Detection: 8.31E+06 Structure /g PM 10

(Note: Amended report per client request to reflect the EPA definition of greater than 10um and less than 0.4um)

Test For Uniformity (Chi-Square results)

Structure Class	Min ID Level Required	Counts		Density Str/mm ²	Conc. Str/g PM10	Poisson 95% Confidence Interval	
		Primary Str.	Total Str.			Lower Limit Str/g PM10	Upper Limit Str/g PM10
Asbestos Structures >5um, ≤10um	ADX/CD	0	0	0	0	0	8.31E+06
Asbestos Structures >5um, ≤10um (Chrys)	CD	0	0	0	0	0	8.31E+06
Asbestos Structures >5um, ≤10um (Amph)	ADX	0	0	0	0	0	8.31E+06
Asbestos Structure >10um (Long)	ADX/CD	0	0	0	0	0	8.31E+06
Asbestos Structure >10um (Chrys)	CD	0	0	0	0	0	8.31E+06
Asbestos Structure >10um (Amph)	ADX	0	0	0	0	0	8.31E+06
Total Protocol Asbestos Structures	ADX/CD	0	0	0	0	0	8.31E+06
Protocol Asbestos Structures (Chrys)	CD	0	0	0	0	0	8.31E+06
Protocol Asbestos Structures (Amph)	ADX	0	0	0	0	0	8.31E+06
Total Protocol Non Asbestos Structures	NAM	1	1	1	2.80E+06	0.07E+06	15.4E+06


 Approved by Technical Director

TEM Asbestos Structure Count (Page of)

Report number: 137822

SAMPLE NO: SA05-0.33 BPC

X 9,200

Grid	Grid Opening	Number of structures primary	Number of structures Total	Class	Type of Structure	Width Mm	Length Mm	Comments
1B	F4-6							
	h43							
	h46							
	F5-1							
	F5-4							
	G5-4				E	1	82	Non asb
	C7-6							
	E7-3							
	F7-2							
	I7-3							
	K5-6							
21	F6-1							
	F6-4							
1C	F2-3							
	F3-3							
	F3-6							
	G2-2							
	G2-6							
	H2-3							
	C3-4							
	E2-1							
	F3-4							
	F3-1							
	h3-3							
	h3-6							
	C4-1							
	C4-4							
	E4-1							
	C5-1							
	C5-4							
	E5-1							
	F5-1							
	K5-4							
21	F5-4							
1D	C2-6							
	E2-3							

TEM Asbestos Structure Count (Page of)

Report number: 137822

SAMPLE NO: SA05-0.33 BPC

X 9,200

Grid	Grid Opening	Number of structures primary	Number of structures Total	Class	Type of Structure	Width Mm	Length Mm	Comments
1D	E26							
	F23							
	F26							
	G23							
	G26							
	E24							
	F34							
	G34							
	F33							
	E36							
	E33							
	F36							
	G36							
	H34							
	H44							
	H46							
Q	H51							
1E	F23							
	E26							
	F23							
	F26							
	G23							
	E24							
	F34							
	E36							
	F34							
	G41							
	G44							
	E44							
	F44							
	G44							
	E41							
	E44							
	F41							
	F44							
	G43							
	G56							

20

Elutriator Data

Date: 6-8-10

Client: Nortongate

Lab #: 137822

Sample ID: SA05-0.33 RPL

Sample weight (g): 68

Time air flow started: 7:30

Tumbler rpm: 45

IST Flowmeter (mL/min): 130

ME Flowmeter (mL/min): 1370

Filter No.	Start Time	Tested flow rate (mL/min)	Final Filter Wt (mg)	Initial Filter Wt (mg)	Dust Weight (mg)	Time Value (min)	Avg. rate of deposition (ug/min)	Optimal time (min)
1	9:30	140	0.04699	0.02424	22.75	30		
2	10:00		0.04151	0.02418	17.33	20	867	
3	10:20		0.04323	0.02451	18.72	20	936	
4	10:40		0.04188	0.02443	17.45	20	872	
5	11:00		0.04224	0.02449	17.75	30	592.7	
6	11:30							
7								
8								
Time							Dep. Rate $\frac{149}{min}$	Estimate
1	10:27	10:31	24.890	24.520	370	4	93	
2	10:49	10:52	24.660	24.434	226	3	75	72
3	11:07	11:09.15	24.515	24.373	142	2.15	65	
4	11:20	11:22.30	24.368	24.390	178	2.30	71	72
5	11:38	11:40.25	24.540	24.370	170	2.25	70	

6-8-10

* SHUT DOWN @ 1144

138029

Moisture content

42

6-8-10

#SA111-1.00BPC Rush

dish wt. 19.23 g

Samp. wt. 119.81 - 19.23 = 100.58 g (initial wt.)

6:15-7:15 112.32 - 19.23 = 93.09 g

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$$\% \text{ moist.} \rightarrow 100 \times \frac{100.58 - 93.06}{93.06} = 8.08\%$$

#137822 - #SA05-0.33BPC Rush

dish wt. 31.48 g

Samp. wt. 131.30 - 31.48 = 99.82 (initial wt.)

6:15-7:15 123.48 - 31.48 = 92.00

8:05-9:05 123.44 - 31.48 = 91.96 (Final wt.)

$$\% \text{ moist.} \rightarrow 100 \times \frac{99.82 - 91.96}{91.96} = 8.55\%$$

#137822 - #SSAR6-01-00BPC Rush

dish wt. 31.45 g

Samp. wt. 131.28 - 31.45 = 99.83 g (initial wt.)

6:15-7:15 122.65 - 31.45 = 91.20 g

8:05 122.61 - 31.45 = 91.16 g (Final wt.)

$$\% \text{ moist.} \rightarrow 100 \times \frac{99.83 - 91.16}{91.16} = 9.51\%$$

BP

Spot Size Measurements

Scope: #60B
Date: May 2010
Name: R

Conditions of Measurements

High Voltage: 100K
Beam Current: 10 μ A
Magnification: 19,200
Condenser Aperture Size: #2

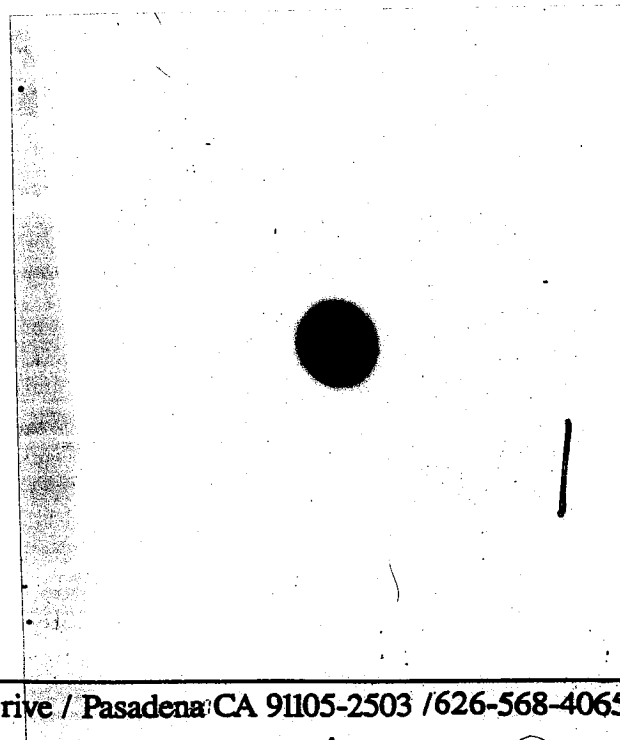
Measurements from a photo 8.5

Shortest diameter: 8.5 mm
Longest diameter: 9 mm
Average: 8.75 mm

Spot Size Calculation

Spot size in μ m = $\frac{(\text{average spot size in mm}) \times 1000 \mu\text{m} \times 0.4125}{\text{Magnification}}$ 188

Note: $1.65/4 = 0.4125$ (see the Hitachi Fax)



TEM CAMERA CONSTANT DETERMINATION

TEM H600B

Measured and Calculated by LS Date May 2010

Camera Constant (mm A) = D (mm) X 1/2 X d (A)

where D (mm) is the diameter of a gold ring and

d (A) is the d-spacing in Angstroms for a particular reflection

CC (1*) = (24.1 mm) X 1/2 x 2.355 = 28.34

CC (2*) = (27.8 mm) X 1/2 x 2.039 = 28.34

CC (3*) = (39.3 mm) X 1/2 x 1.442 = 28.34

CC (4*) = (45.9 mm) X 1/2 x 1.230 = 28.33

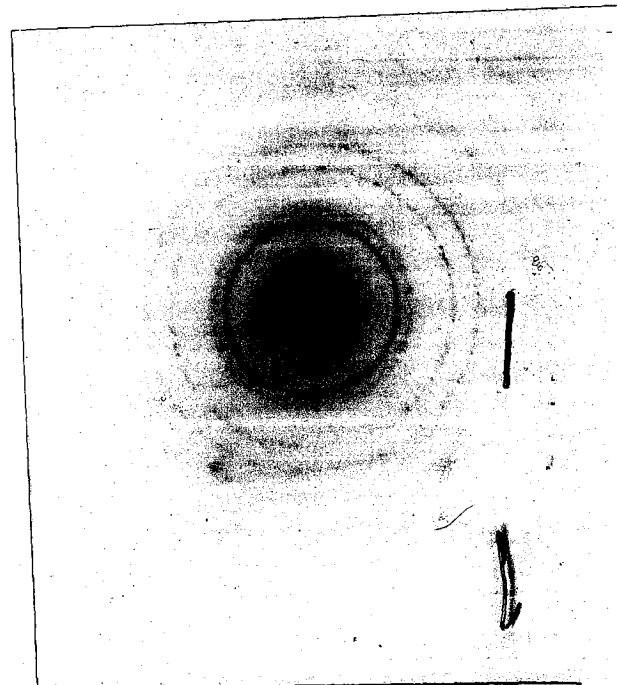
Average Camera Constant = $\sqrt{28.3}$

* 1 is the first largest diameter ring. 2 the second, etc.

Average Camera Constant = $(CC<1> + \dots + CC<n>) \times 1/n$

For gold:

d(A)	nk1
2.355	(111)
2.039	(200)
1.442	(220)
1.230	(311)
1.1774	(222)



08/07/01
csl

DATE: May 2010
 WEEKLY CALIBRATION 3m
 MONTHLY CALIBRATION 3m
 AFTER SERVICE CALIBRATION _____

A-600/B-600/C-600

BY: R

Measurement	Number of Spacing Flourescent Screen Magnification	Distance (mm)	Number of Spacing Film Magnification
1	<u>25,600x</u> 53.5/6 = 19,260	<u>12,000x</u> 51/12 = 9,180	
2	53.5/6 = 19,260	51.5/12 = 9,270	
3	53/6 = 19,080	51.5/12 = 9,270	
4	53/6 = 19,180	51/12 = 9,180	
5	53.5/6 = 19,260	51/12 = 9,180	
6		51/12 = 9,180	
7	ave 19,200		
8		ave 9,200	
9			
10			
AVERAGE:			

OPERATING VOLTAGE 100 KV

- 54, 864 lines/inch or 2,160 lines/mm or 0.463µm/line
- 28, 800 lines/inch or 1,134 lines/mm or 0.882µm/line
- 15, 240 lines/inch or 600 lines/mm or 1.67µm/line
- 16.94 µm for one bar and one opening for Ni screen on



EM CALIBRATION 2
 92)

SCOPE B

K = [Cn/C(Si)] / [In/(Si)]
 C(Si) = 18.74

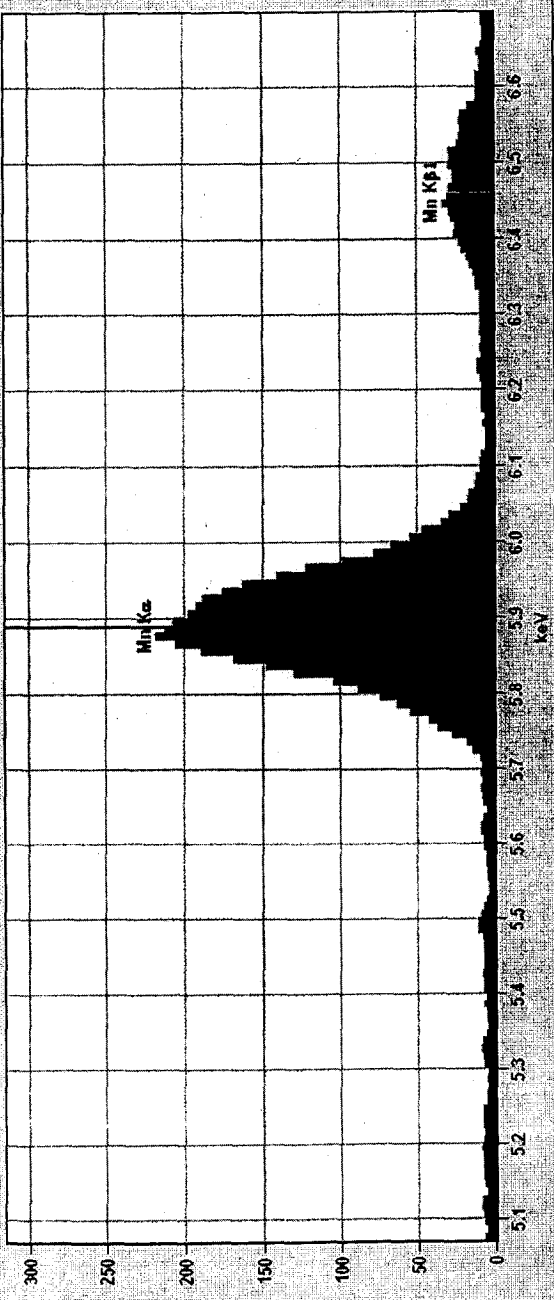
n	Cn	RUN 1		RUN 2		RUN 3		RUN 4		RUN 5		RUN 6	
		I(Si)=	In	I(Si)=	In	I(Si)=	In	I(Si)=	In	I(Si)=	In	I(Si)=	In
Na	1.81	1694	1.3034	1095	1.0674	986	1.5627	1133	1.4112	1004	1.5587	395	1.8251
Mg	7.57	6992	1.3207	3738	1.3077	4447	1.4491	4902	1.3641	4714	1.3885	1983	1.5205
Al	6.54	7768	1.027	4152	1.0171	5455	1.0206	5761	1.0028	5708	0.9906	2576	1.0112
Si	18.74	22860	1	12101	1	15953	1	16554	1	16203	1	7464	1
K	0.97	1453	0.8144	827	0.7574	1311	0.6299	1333	0.6428	1195	0.7018	584	0.6615
Ca	8.26	6570	1.5336	3406	1.566	5845	1.203	5222	1.3973	4998	1.4289	2852	1.1535
Ti	3.02	2235	1.6483	1170	1.6668	1821	1.4118	1867	1.4289	1753	1.4895	928	1.2962
Mn	0.14	10	17.078	22	4.1092	12	9.9316	29	4.2645	2	60.523	22	2.5346
Fe	9.51	5898	1.9669	2935	2.0923	4934	1.6408	4856	1.73	4473	1.8383	2351	1.6111
O	43.83			7849	3.6059	7051	5.2917	10526	3.6783	9433	4.0174	3333	5.2377

** NVLAP REQUIREMENTS **
 1.0 < K(Na) wrt Si < 4.0
 1.0 < K(Mg) & K(Fe) wrt Si < 2.0
 1.0 < K(Al) & K(Ca) wrt Si < 1.75

K(Mg)/K(Fe) < 1.5

stdev < 10% for Mg, Al, Si, Fe
 stdev < 20% for Na
 wrt mean value of k-factor wrt Si

Full scale counts: 303
 EDS RESOLUTION FOR M600B-5.19-10-RS(1)
 Cursor: 5.888 KeV
 213 Counts



Auto Manual FWHM Fe55 Bench Test

Elements

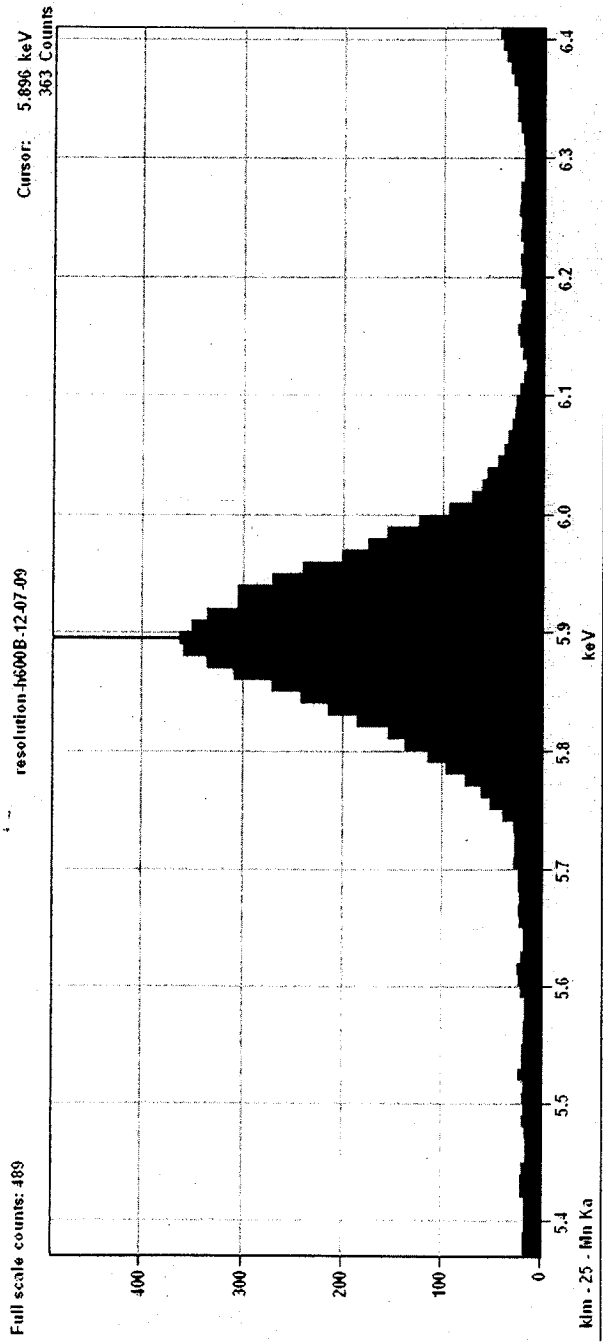
Atomic Symbol: Line:
 Atomic Symbol: Line:
 Ratio Peak

Additional Measurements
 Measure Zero Peak Measure FWHM and FWTM

Acquisition Criteria
 Lifetime (s) Max Time:
 Peak Count No. Trials:

Time Constant: (Slow)

Total #	MN Control...	Net Counts	FWHM (eV)	Avg. FWHM...
1	5.896	3991	148.79	148.79
2	5.895	3960	155.00	151.89
3	5.894	3178	155.83	153.21
4	5.892	3379	149.17	152.20
5	5.891	3438	155.40	152.84
	---	---	---	---
Avg:	5.893	3663	152.84	
Stdev:	0.002	368	3.54	
RMS:	0.0%	10.0%	2.3%	



Auto | Manual FWHM | Fe55 Bench Test

Elements

Atomic Symbol Mn Line K

Atomic Symbol Line K

Ratio Peaks

Additional Measurements

Measure Zero Peak Measure FWHM and PwTM

Acquisition Criteria

Livetime (s) Max Time: 50

Peak Count No. Trials: 5

Time Constant: 50 (Slow)

Trial #	Mn Centroid ...	Net Counts	FWHM (eV)	Avg. FWHM ...
1	5.896	1277	126.16	126.16
2	5.900	5295	151.73	138.95
3	5.897	6460	146.02	141.30
4	5.898	5560	146.26	142.54
5	5.899	5291	133.62	140.76

	Avg: 5.898	4776	140.76	
	Sigma: 0.001	2014	10.52	
	RMS: 0.0%	42.2%	7.5%	



Laboratory Submittal Form

137822

Date: _____ Time: _____ Relinquished by: _____
 Client: Northgate Date of Shipment: _____
 Address: 1100 Quail Street, Suite 102 Shipped from: _____ Carrier: _____
 Newport Beach, CA 92660 Client P.O. No: 2027.01
 Telephone: 949-260-9293 Client Project ID: COC# 02027.01.2127
 Contact: Derrick Willis TRONOX LLC. Henderson
 Results via: Fax No: _____ Email address: Derrick.Willis@ngem.com Verbal

(Complete written reports will follow all analyses, in addition to any prior verbal, fax, or email results)
 Turnaround Time: STD Sample Preservatives: _____
 Number of Samples: 9 (bea) Sampler's Name: _____
 Date & Time of Sample Collection: 5-13-10 Holding Times: _____ Signature: _____
 Type: Water Waste Water Soil Filter Impinger Sorbent Tube Other

EMS Only	Client Sample No.	Description/Location	Analysis	Volume/Weight
1	SSAL5-02.0.00BPC		Elutriator	
2	SSAL5-02.0.33BPC			
3	SA19-0.33BPC			
4	SA19-0.33BPC_FD			
5	SSAL5-01-0.00BPC			
6	SSAL5-01.033BPC			
7	SSAR6-01-0.00BPC	SEE ATTACHMENT		
8	SSAR6-01-0.33BPC			
9	SA05-0.33BPC			
10				
11	EPP: email: Frank.Hagar@ngem.com			
12				
13				
14				
15				
16				
17				

For EMS Only — 137822
 Laboratory Number: _____ Received by: [Signature] Time: 10:05
 Date of Package Delivery: 5/19/2010 Shipping Bill Retained? yes
 Condition of Package on Receipt: OK Condition of Custody Seal: NONE
 Number of Samples: 9 Chain of Custody Signature: [Signature]
 Disposition of Samples: EMS LABS Misc. Info: SF 7/06

1100 Quail Street, Suite 102
Newport Beach, CA 92660 (949) 260-9293

Required Project Information:

Lab Name: EMS Laboratories, Inc.
Address: 117 W Bellvue Dr
Pasadena, CA 91105
Lab PM: Tony Kolk
Phone/Fax: 626-588-4085
Lab PM email: tkolk@emslabs.com
Applicable Lab Quote #:

Required Invoice Information:

Site ID #: TRONOX LLC, HENDERSON
Project #: 2027.01
Site Address: 560 W Lake Mead Drive
City: Henderson State, ZIP: NV, 89015
Address: PO Box 55
City/State: Henderson, NV 89009 Phone #: (949) 260-9293
PO #:
Send EDD to: Frank.Hagar@ngem.com
Send Invoice to:
OC Hardcopy report to: PDF Electronic Version Only - FTP Upload
CC Hardcopy report to:

Required Ship to Lab:

COC # 02027.01.2127
Total # of Samples: 9
Event Completed?

ITEM #	SAMPLE ID SAMPLES IDS MUST BE UNIQUE	SAMPLE LOCATION	MATRIX CODE G=GRAB C=COMP	SAMPLE TYPE	SAMPLE DATE	SAMPLE TIME	#OF CONTAINERS	Comments/Lab Sample I.D.	Analysis	Preservative	Filtered	Regular	Rush	Mark One
1	SSAL5-02-0-00BPC	SSAL5-02	SO	C	05/13/2010	12:30	3		PhB-Asbestos	UNPRES	N			
2	SSAL5-02-0-33BPC	SSAL5-02	SO	C	05/13/2010	12:30	3							
3	SA19-0-33BPC	SA19	SO	C	05/13/2010	11:55	3							
4	SA19-0-33BPC_FD	SA19	SO	C	05/13/2010	11:55	3							
5	SSAL5-01-0-00BPC	SSAL5-01	SO	C	05/13/2010	11:30	3							
6	SSAL5-01-0-33BPC	SSAL5-01	SO	C	05/13/2010	11:30	3							
7	SSAR6-01-0-00BPC	SSAR6-01	SO	C	05/13/2010	10:35	3							
8	SSAR6-01-0-33BPC	SSAR6-01	SO	C	05/13/2010	10:35	3							
9	SA05-0-33BPC	SA05	SO	C	05/13/2010	10:20	3							

Additional Comments/Special Instructions:

RELINQUISHED BY / AFFILIATION: *James Brown*
DATE/TIME: *05/13/10 13:35*
ACCEPTED BY / AFFILIATION: *[Signature]*
DATE/TIME: *05/13/10 13:35*

SHIPPER'S INFO

Company: Francisco Barron
Tracking #: _____
Signature of Shipper: *[Signature]*
Date/Time: *05/13/10 13:35*
Temp in OC: _____
Samples on Ice?: Y/N
Sample intact?: Y/N
Trip Blank?: Y/N



COC # 02027.01.2127

Total # of Samples: 9

Event Complete?

Lab Name: ENIS Laboratories, Inc.	Site ID #:	TRONOX LLC, HENDERSON		Send Invoice to:	
Address: 117 W. Bellvue Dr.	Project #:	2027.01		Address:	PO Box 55
Pasadena, CA 91105	Site Address:	560 W. Lake Mead Drive		City/State:	Henderson, NV 89008
Lab P.M.: Tony Kolk	City:	Henderson	State, Zip:	NV, 89015	Phone #:
Phone/Fax: (726) 568-4065	Site P.M. Name:	Derrick Willis		PO #:	
Lab P.M. email: tdkolk@enislabs.com	Phone/Fax:	(949) 375-7004		Send EDD to:	Frank.Hagar@ngem.com
Applicable Lab Quote #:	Site P.M. Email:	derrick.willis@ngem.com		CC Hardcopy report to:	PDF Electronic Version Only - FTP Upload
				CC Hardcopy report to:	

ITEM #	SAMPLE ID Samples IDs MUST BE UNIQUE	SAMPLE LOCATION	MATRIX CODE	G=GRAB C=COMP	SAMPLE TYPE	SAMPLE DATE	SAMPLE TIME	#OF CONTAINERS	Comments/lab Sample I.D.	Analysis	Preservative	Filter	Regular	Rush	Mark One
1	SSAL5-02-0-00BPC		SSAL5-02	C	N	05/13/2010	12:30	3		PhB-Asbestos	UNPRES	N			
2	SSAL5-02-0-33BPC		SSAL5-02	C	N	05/13/2010	12:30	3							
3	SA19-0-33BPC		SA19	C	N	05/13/2010	11:55	3							
4	SA19-0-33BPC_FD		SA19	C	FD	05/13/2010	11:55	3							
5	SSAL5-01-0-00BPC		SSAL5-01	C	N	05/13/2010	11:30	3							
6	SSAL5-01-0-33BPC		SSAL5-01	C	N	05/13/2010	11:30	3							
7	SSAR6-01-0-00BPC		SSAR6-01	C	N	05/13/2010	10:35	3							
8	SSAR6-01-0-33BPC		SSAR6-01	C	N	05/13/2010	10:35	3							
9	SA05-0-33BPC		SA05	C	N	05/13/2010	10:20	3							

Additional Comments/Special Instructions:

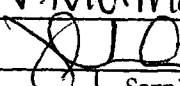

REINQUISHED BY / AFFILIATION: *Francisco Barron* DATE/TIME ACCEPTED BY / AFFILIATION: *Francisco Barron* DATE/TIME: *05/13/10 13:35*

Shipping Info: Company: *Francisco Barron* Tracking #: *511410*

Signature of SQA/ER: *Francisco Barron* DATE SIGNED: *05/13/10* TIME: *13:35*

Temp in OC: *13.35* Samples on Ice? *(N) Y/N* Sample intact? *(N) Y/N* Trip Blank? *(N) Y/N*

SAMPLE LOG-IN SHEET

Lab Name EMS LABS		Page _____ of _____			
Received By (Print name) V. Molina		Log in Date 5-19-10			
Received By (Signature) 					
Sample Delivery Group No. _____					
Remarks 1. Custody Seal(s) <input checked="" type="radio"/> Present <input type="radio"/> Absent <input checked="" type="radio"/> Intact <input type="radio"/> Broken 2. Custody Seal Nos 580187/580193 580196/580195 3. Chain of Custody Records <input checked="" type="radio"/> Present <input type="radio"/> Absent 4. Traffic Reports or Packing List <input checked="" type="radio"/> Present <input type="radio"/> Absent 5. Air Bill <input checked="" type="radio"/> Present <input type="radio"/> Absent Air Bill Sticker <input checked="" type="radio"/> Present <input type="radio"/> Absent 6. Air Bill No. 793550634180/4135 7. Sample Tags <input checked="" type="radio"/> Present <input type="radio"/> Absent Sample Tag Numbers <input checked="" type="radio"/> Listed <input type="radio"/> Not Listed 8. Sample Condition <input checked="" type="radio"/> Intact <input type="radio"/> Broken <input type="radio"/> Leaking Chain of Custody 9. Does information on custody records, traffic reports and sample tags agree? <input checked="" type="radio"/> yes <input type="radio"/> no 10. Date Received by Lab 5/19 11. Time Received 10:08	EPA SAMPLE #	Corresponding Sample Tag#	Assigned Tag#	Remarks Condition of Sample, Shipment etc.	
			137822	SSAL5-02 D.00BPC	137822-02
		137822	SSAL5-02 D.33BPC	137822-02 0.33	
		137822	SA19-0.33 BPC	137822- 0.33	
		137822	SA19-0.33 BPC-FD	137822- 0.33 FD	
		137822	SSAL5-01 D.00BPC	137822- 01	
		137822	SSAL5-01 D.033BPC	137822- D1.0.33	
		137822	SSAP6-01 D.00BPC	137822- D1.0.00	
		137822	SSAP6-01 D.33BPC	137822- D1.0.33	
		137822	SA05-0.33 BPC	137822- D.33	↓
Sample Transfer					
Fraction	Fraction				
Area	Area				
By	By				
On	On				
Contract Client and Attach Records of Resolution					
Received By 		Logbook No.			
Date 5-19-10		Logbook Page No.			

FORM DC-1

From: Origin ID: LASA (949) 514-9982
Sonny Nguyen(NGEM)/c/o Susan Crowley
Tronox
560 W. Lake Mead Parkway

Henderson, NV 89015



Ship Date: 18MAY10
ActWgt: 45.0 LB
CAD: 100845654/NET3010
Dims: 24 X 14 X 16 IN

Delivery Address Bar Code



Ref # 10203.01.02
Invoice #
PO #
Dept #

SHIP TO: (626) 568-4065 BILL SENDER

Tony Kolk
EMS Laboratories, Inc.
117 W BELLEVUE DR

PASADENA, CA 91105

6 of 6

WED - 19 MAY A2

MPS# 7935 5063 4180
0263

PRIORITY OVERNIGHT

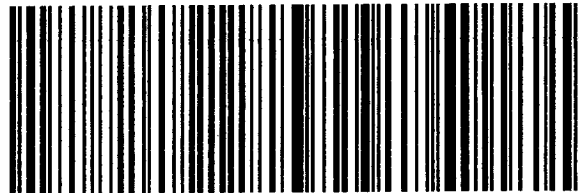
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91105

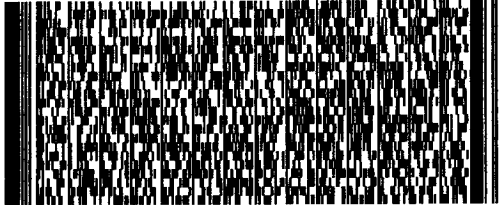
CA-US

BUR

QZ WHPA



0960191880528



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