LABORATORY DATA CONSULTANTS, INC.
7750 El Camino Real, Suite 2L Carlsbad, CA 92009 Phone: 760/634-0437 Fax: 760/634-0439

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

December 4, 2009

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

Dear Ms. Arnold,

Enclosed is the revised data validation report for the fraction listed below. The data validation was performed under Stage 4 guidelines. Please replace the previously submitted report with the enclosed revised report.

LDC Project # 21423:

SDG #	Fraction
TRX09072041	Organic Acids

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

Sincerely,

ETRauto

Erlinda T. Rauto
Operations Manager/Senior Chemist

LABORATORY DATA CONSULTANTS, INC.
7750 El Camino Real, Suite 2L Carlsbad, CA 92009 Phone: 760/634-0437 Fax: 760/634-0439

Northgate Environmental Management, Inc.
1100 Quail Street Ste. 102
New Port beach, CA 92660
ATTN: Ms. Cindy Arnold

September 14, 2009

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

Dear Ms. Arnold,

Enclosed are the final validation reports for the fraction listed below. These SDGs were received on August 20, 2009. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 21423:

SDG #	Fraction
TRX09052940, TRX09060140, TRX09060141, TRX09072852, TRX09060256, TRX09060456, TRX09060457, TRX09060566, TRX09060567, TRX09060840, TRX09061850, TRX09061951, TRX09070755, TRX09071051, TRX09071450, TRX09072041, TRX09072352, TRX09072741, TRX09073051, TRX09080450	Organic Acids

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 Inorganic Data Review, October 2004
- EPA SW 846, Third Edition, Test Methods for Evaluating Solid Waste, update 1, July 1992; update IIA, August 1993; update II, September 1994; update IIB, January 1995; update III, December 1996; update IIIA, April 1998; IIIB, November 2004; Update IV, February 2007

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

Sincerely,

Erlinda T. Rauto
Operations Manager/Senior Chemist

V:\LOGIN\TronoxNG\21423COV.wpd

Attachment 1

Stage 2B/4 EDD

LDC #21423 (Tronox LLC-Northgate, Henderson NV / Tronox Phase B 2009)

LDC	SDG#	DATE REC'D	(3) DATE DUE	Organic Acids (HPLC)																															
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
A	TRX09052940	08/20/09	09/11/09	1	0																														
B	TRX09060140	08/20/09	09/11/09	1	0																														
C	TRX09060141	08/20/09	09/11/09	1	0																														
D	TRX09072852	09/04/09	09/11/09	0	6																														
E	TRX09060256	08/20/09	09/11/09	2	0																														
F	TRX09060456	08/20/09	09/11/09	1	0																														
G	TRX09060457	08/20/09	09/11/09	0	2																														
H	TRX09060566	08/20/09	09/11/09	0	1																														
I	TRX09060567	08/20/09	09/11/09	2	0																														
J	TRX09060840	08/20/09	09/11/09	2	0																														
K	TRX09061850	08/20/09	09/11/09	0	6																														
L	TRX09061951	08/20/09	09/11/09	6	0																														
M	TRX09070755	08/20/09	09/11/09	0	6																														
N	TRX09071051	08/20/09	09/11/09	5	0																														
O	TRX09071450	08/20/09	09/11/09	0	10																														
P	TRX09072041	08/20/09	09/11/09	5	0																														
Q	TRX09072352	08/20/09	09/11/09	3	4																														
R	TRX09072741	08/20/09	09/11/09	2	7																														
S	TRX09073051	09/04/09	09/11/09	1	4																														
T	TRX09080450	09/04/09	09/11/09	1	12																														
Total	T/LR			33	58	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	91

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 #: 21423

SDG #: TRX09052940, TRX09060140, TRX09060141,TRX09072852, TRX09060256 TRX09060456, TRX09060457, TRX09060566, TRX09060567, TRX09060840, TRX09061850, TRX09061951, TRX09070755, TRX09071051, TRX09071450 TRX09072041, TRX09072352, TRX09072741, TRX09073051,TRX09080450

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_LDC21423_091409.doc
IV. EDD Delivery				
Was the final EDD sent to the client?	X			

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Data Validation Reports
LDC# 21423

Organic Acids

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: May 27, 2009

LDC Report Date: September 1, 2009

Matrix: Water

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09052940

Sample Identification

EB052709
EB052709MS
EB052709MSD

Introduction

This data review covers 3 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

Sample EB052709 was identified as an equipment blank. No organic acid contaminants were found in this blank with the following exceptions:

Equipment Blank ID	Sampling Date	Compound	Concentration	Associated Samples
EB052709	5/27/09	Benzenesulfonic acid Diethyl phosphorodithioic acid 4-Chlorobenzenesulfonic acid	3.8 mg/L 17 mg/L 4.1 mg/L	No associated samples in this SDG

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) were not within QC limits. Since the sample concentration was greater than the spiked concentration, no data were qualified.

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09052940	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09052940

SDG	Sample	Compound	Flag	A or P	Reason
TRX09052940	EB052709	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09052940

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09052940

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423A47
SDG #: TRX09052940
Laboratory: Alpha Analytical, Inc.

Date: 8/31/09
Page: 1 of 1
Reviewer: JV6
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 5/27/09
IIa.	Initial calibration	A	r²
IIb.	Calibration verification/ICV	A	CCV ≤ 20 % ICV ≤ 30 %
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not req'd.
IVb.	Matrix spike/Matrix spike duplicates	SW	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	SW	EB = 1

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

Validated Samples: Water

1	EB052709	11		21		31	
2	EB052709MS	12		22		32	
3	EB052709MSD	13		23		33	
4	MBLK - 22124	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:

VALIDATION FINDINGS WORKSHEET

METHOD: ____GC ___✓HPLC

8310	8330	8151	8141	8141(Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,I)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	Organic Acids	
P. Pyrene	P.		P. Fenthion	A. Dimethyl phosphorodithioic acid	
Q.	Q		Q. Parathion-ethyl	B. Benzene sulfonic acid	
R.			R. Trichloronate	C. Phthalic acid	
S.			S. Merphos	D. Diethyl phosphorodithioic acid	
			T. Stirofos	E. 4-chlorobenzene sulfonic acid	
			U. Tokuthion		

Notes:_____

cmpd_list.wpd

LDC #: 21423A47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: JV6
2nd Reviewer:

METHOD: __ GC / HPLC
Y/N N/A Were field blanks identified in this SDG?
Y/N N/A Were target compounds detected in the field blanks?
Blank units: mg/L Associated sample units: NA
Sampling date: 5/27/09
Field blank type: (circle one) Field Blank / Trip Blank / Atmospheric Blank / Ambient Blank
Rinsate / Equipment Rinsate / Equipment Blank / Source Blank / Other:

Associated Samples: None

Compound	Blank ID	Blank ID	Sample Identification							
[redacted]	1									
B	3.8									
D	17									
E	4.1									
CRQL										

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

Associated Samples:

Compound	Blank ID	Blank ID	Sample Identification							
[redacted]										
CRQL										

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

LDC #: 21423 A47
SDG #: Su Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: JVG
2nd Reviewer: ______

METHOD: __ GC ✓ HPLC

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

- (Y) N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG?
- (Y) N N/A Was an MS/MSD analyzed every 20 samples for each matrix or whenever a sample extraction was performed?
- Y (N) N/A Were the MS/MSD percent recoveries (%R) and relative percent differences (RPD) within QC limits?

#	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	2/3	B	21 (60-140)	23 (60-140)	( )	↓	No qual
		D	-12 (↓)	-13 (↓)	( )	↓	↓
			( )	( )	( )		(Parent conc.
			( )	( )	( )		>4x spike amt.
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
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			( )	( )	( )		

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: May 28, 2009

LDC Report Date: September 1, 2009

Matrix: Water

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09060140

Sample Identification

M-127B

Introduction

This data review covers one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09060140	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09060140

SDG	Sample	Compound	Flag	A or P	Reason
TRX09060140	M-127B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09060140

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09060140

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423B47
SDG #: TRX09060140
Laboratory: Alpha Analytical, Inc.

Date: 8/31/09
Page: 1 of 1
Reviewer: SV6
2nd Reviewer: [signature]

METHOD: HPLC Organic Acids (HPLC Method)

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: 5/28/09
IIa.	Initial calibration	A	r r
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	SW	09052940-01 (No associated sample, No qual)
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	N	

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

Validated Samples:

Water

1	M-127B	11		21		31	
2	~~M-127BMS~~	12		22		32	
3	~~M-127BMSD~~	13		23		33	
4	MB1K-22124	14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: May 29, 2009

LDC Report Date: September 1, 2009

Matrix: Water

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09060141

Sample Identification

MC-45B

Introduction

This data review covers one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09060141	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09060141

SDG	Sample	Compound	Flag	A or P	Reason
TRX09060141	MC-45B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09060141

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09060141

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423C47
SDG #: TRX09060141
Laboratory: Alpha Analytical, Inc.

Date: 8/31/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 5/29/09
IIa.	Initial calibration	A	r²
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not req'd.
IVb.	Matrix spike/Matrix spike duplicates	SW	09052940-01 (No associated sample, No qual)
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	N	

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

Validated Samples: Water

1	MC-45B	11		21		31	
2	MBLK - 22124	12		22		32	
3		13		23		33	
4		14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: July 21 through July 22, 2009

LDC Report Date: September 10, 2009

Matrix: Soil

Parameters: Organic Acids

Validation Level: Stage 4

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09072852

Sample Identification

SA166-10BSSPLP
SA166-10BSSPLPpH(SPLP)
SA166-10BSSPLP(DI SPLP)
SA182-10BSPLP
SA182-10BSPLPpH(SPLP)
SA182-10BSPLP(DI SPLP)

Introduction

This data review covers 6 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

All target compound identifications were within validation criteria.

VI. Project Quantitation Limit

All project quantitation limits were within validation criteria.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09072852	All compounds reported below the PQL.	J (all detects)	A

VII. System Performance

The system performance was acceptable.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09072852

SDG	Sample	Compound	Flag	A or P	Reason
TRX09072852	SA166-10BSSPLP SA166-10BSSPLPpH(SPLP) SA166-10BSSPLP(DI SPLP) SA182-10BSPLP SA182-10BSPLPpH(SPLP) SA182-10BSPLP(DI SPLP)	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09072852

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09072852

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 4

LDC #: 21423D47
SDG #: TRX09072852
Laboratory: Alpha Analytical, Inc.

Date: 9/10/09
Page: 1 of 1
Reviewer: JV6
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 7/21 - 22/09
IIa.	Initial calibration	A	r ✓
IIb.	Calibration verification/ICV	A	CCV ≤ 20 % ICV ≤ 30 %
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	A	09073050-01 ; 09073051-02
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	A	
VI.	Compound Quantitation and CRQLs	A	
VII.	System Performance	A	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	N	

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

Validated Samples: Soil

1	SA166-10BSSPLP	11	MBLK-22436	21		31	
2	SA166-10BSSPLP(SPLP) pH	12 ✓	MBLK-22446	22		32	
3	SA166-10BSSPLP(DISPLP)	13		23		33	
4	SA182-10BSPLP	14		24		34	
5	SA182-10BSPLP(SPLP) pH	15		25		35	
6	SA182-10BSPLP(DISPLP)	16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

LDC #: 21423D47
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVG
2nd Reviewer: [illegible]

Method: ____ GC ✓ HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Were all percent relative standard deviations (%RSD) ≤ 20%?		✓		
Was a curve fit used for evaluation?	✓			
Did the initial calibration meet the curve fit acceptance criteria of ≥ 0.990?	✓			
Were the RT windows properly established?	✓			
IV. Continuing calibration				
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 20%.0 or percent recoveries 80-120%?	✓			
Were all the retention times within the acceptance windows?	✓			
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 the QC limits?			✓	
If the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R outside of criteria?			✓	
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?	✓			
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?			✓	

LDC #: 21423 D47
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JV6
2nd Reviewer: [signature]

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

LDC # 21423D47
SDG# See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: [illegible]

METHOD: HPLC

Parameter: 4-Chlorobenzenesulfonic acid

Date	Detector	Compound	X Conc (ppm)	Y Area	Y^2	
6/02 to 6/03/09	UV HPLC 3	4-Chlorobenzenesulfonic acid	0.025	105332		RF 4213280
			0.050	201649		4032980
			0.100	464100		4641000
			0.250	1152183		4608732
			0.500	2262016		4524032
			1.000	4485504		4485504
			1.500	6696299		4464199
			2.000	8851547		4425774
						Ave 4424438

Regression Output:			Reported	
Constant		-4.19374E-003	c =	-0.004194
Std Err of Y Est		0.00735		
R Squared		0.999917	r 2	0.999917
No. of Observations		8.00000		
Degrees of Freedom		6.00000		
X Coefficient(s)	2.254E-007	-9.41E-015	b =	2.254E-007

LDC #: 21423 D47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer: JVC
2nd Reviewer: [illegible]

METHOD: GC_____HPLC ✓

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

% Difference = 100 * (ave. CF - CF)/ave. CF
CF = A/C

Where: ave. CF = initial calibration average CF
CF = continuing calibration CF
A = Area of compound
C = Concentration of compound

#	Standard ID	Calibration Date	Compound	Average CF(Ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %R	Recalculated %R
1	B4783001.D01	7/30/09	p-CBSA	0.500	0.502	0.502	100.3	100.3
2	B4793001.D11	7/30/09		1.000	0.979 ~~0.979~~	0.979	97.9	97.9
3	B4805001.D23	7/31/09		0.500	0.508	0.508	101.6	101.6
4	B4819001.D37	8/01/09		1.000	1.008	1.008	100.8	100.8

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

LDC #: 21423D47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Page: 1 of 1
Reviewer: JVC
2nd Reviewer: R

METHOD: __ GC ✓ HPLC

The percent recoveries (%R) and relative percent differences (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

RPD =(({SSCMS - SSCMSD} * 2) / (SSCMS + SSCMSD))*100

Where SSC = Spiked sample concentration; SA = Spike added; MS = Matrix spike; SC = Sample concentration; MSD = Matrix spike duplicate

MS/MSD samples: 0907050-01 MS/MSD

Compound	Spike Added (mg/L)		Sample Conc. (mg/L)	Spike Sample Concentration (mg/L)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	--	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											
pCBSA (HPLC)	1.00	1.00	0	1.008	1.030	101	101	103	103	2.2	2.2

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 #: 21423D47
SDG #: See Cover

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

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

METHOD: __ GC __HPLC

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

% Recovery = 100* (SSC-SC)/SA
RPD = I LCS - LCSD I * 2/(LCS + LCSD)

Where: SSC = Spiked sample concentration
SA = Spike added
LCS = Laboratory control sample percent recovery
SC = Concentration
LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: LCS-22464

Compound	Spike Added (mg/kg)		Spiked Sample Concentration (mg/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)										
Diesel (8015)										
Benzene (8021B)										
Methane (RSK-175)										
2,4-D (8151)										
Dinoseb (8151)										
Naphthalene (8310)										
Anthracene (8310)										
HMX (8330)										
2,4,6-Trinitrotoluene (8330)										
p CBSA (HPLC)	2.0	NA	1.89	NA	95	95	—			

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

LDC #: 21423D47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer: JV6
2nd Reviewer: [illegible]

METHOD: __ GC _/_ HPLC

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 within 10% of the reported results?

Concentration= $\frac{(A)(Fv)(Df)}{(RF)(Vs \text{ or } Ws)(\%S/100)}$

A= Area or height of the compound to be measured
Fv= Final Volume of extract
Df= Dilution Factor
RF= Average response factor of the compound In the initial calibration
Vs= Initial volume of the sample
Ws= Initial weight of the sample
%S= Percent Solid

Example:

Sample ID._____ Compound Name ND

Concentration =_____

#	Sample ID	Compound	Reported Concentrations ( )	Recalculated Results Concentrations ( )	Qualifications

Comments: _____

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 1, 2009

LDC Report Date: September 1, 2009

Matrix: Water

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09060256

Sample Identification

PC-40B
PC-4009B

Introduction

This data review covers 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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.

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09060256	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples PC-40B and PC-4009B were identified as field duplicates. No organic acids were detected in any of the samples with the following exceptions:

Compound	Concentration (mg/L)		RPD (Limits)	Difference (Limits)	Flags	A or P
	PC-40B	PC-4009B				
Benzenesulfonic acid	0.053	0.053	-	0 (≤0.050)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09060256

SDG	Sample	Compound	Flag	A or P	Reason
TRX09060256	PC-40B PC-4009B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09060256

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09060256

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423E47
SDG #: TRX09060256
Laboratory: Alpha Analytical, Inc.

Date: 8/31/09
Page: 1 of 1
Reviewer: JV6
2nd Reviewer: [signature]

METHOD: HPLC Organic Acids (HPLC Method)

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: 6/01/09
IIa.	Initial calibration	A	r²
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd
IVb.	Matrix spike/Matrix spike duplicates	SW	09052940-01 (No associated sample. No qual
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	SW	D = 1,2
X.	Field blanks	N	

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

Validated Samples:

Water

1	PC-40B	11		21		31	
2	PC-4009B	12		22		32	
3	MBLK - 22124	13		23		33	
4		14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

VALIDATION FINDINGS WORKSHEET

METHOD: ____GC ___✓HPLC

8310	8330	8151	8141	8141(Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,l)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	Organic Acids	
P. Pyrene	P.		P. Fenthion	A. Dimethyl phosphorodithioic acid	
Q.	Q		Q. Parathion-ethyl	B. Benzene sulfonic acid	
R.			R. Trichloronate	C. Phthalic acid	
S.			S. Merphos	D. Diethyl phosphorodithioic acid	
			T. Stirofos	E. 4-chlorobenzenesulfonic acid	
			U. Tokuthion		

Notes:_____

LDC #: 21423 #47
SDG #: Sa Gary

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

METHOD: ___ GC / HPLC

Y N N/A Were field duplicate pairs identified in this SDG?

Y N N/A Were target compounds detected in the field duplicate pairs?

Compound	Concentration (mg/L)		%RPD Limit ~~≤30~~	Qualification Parent only / All Samples
	1	2		
B	0.053	0.053	0 (≤ 0.050 Diff)	

Compound	Concentration ( )		%RPD Limit _____	Qualification Parent only / All Samples

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 3, 2009

LDC Report Date: September 2, 2009

Matrix: Water

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09060456

Sample Identification

M-7BB
M-7BBMS
M-7BBMSD

Introduction

This data review covers 3 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09060456	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09060456

SDG	Sample	Compound	Flag	A or P	Reason
TRX09060456	M-7BB	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09060456

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09060456

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423F47
SDG #: TRX09060456
Laboratory: Alpha Analytical, Inc.

Date: 8/31/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 6/03/09
IIa.	Initial calibration	A	r ≥
IIb.	Calibration verification/ICV	A	CCV ≤ 20 % ICV ≤ 30 %
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	N	

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

Validated Samples: Water

1	M-7BB	11		21		31	
2	M-7BBMS	12		22		32	
3	M-7BBMSD	13		23		33	
4	MBlk-22184	14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 3, 2009

LDC Report Date: September 1, 2009

Matrix: Soil

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09060457

Sample Identification

RSAM3-0.5B
RSAM2-0.5B

Introduction

This data review covers 2 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09060457	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09060457

SDG	Sample	Compound	Flag	A or P	Reason
TRX09060457	RSAM3-0.5B RSAM2-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09060457

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09060457

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423G47
SDG #: TRX09060457
Laboratory: Alpha Analytical, Inc.

Date: 8/31/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 6/03/09
IIa.	Initial calibration	A	r²
IIb.	Calibration verification/ICV	A	CCV ≤ 20 % ICV ≤ 30 %
III.	Blanks	A	
IVa.	Surrogate recovery	N	
IVb.	Matrix spike/Matrix spike duplicates	SW	09060566-01 (No associated sample, No qual)
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	N	

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

Validated Samples: Soil

1	RSAM3-0.5B	11		21		31	
2	RSAM2-0.5B	12		22		32	
3	MBLK-22155	13		23		33	
4		14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 4, 2009

LDC Report Date: September 1, 2009

Matrix: Soil

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09060566

Sample Identification

RSAJ3-0.5B
RSAJ3-0.5BMS
RSAJ3-0.5BMSD

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

Sample FB060409 (from SDG TRX09060567) was identified as a field blank. No organic acid contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. 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 one compound, the LCS percent recoveries (%R) were within QC limits and no data were qualified.

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09060566	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09060566

SDG	Sample	Compound	Flag	A or P	Reason
TRX09060566	RSAJ3-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09060566

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09060566

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423H47
SDG #: TRX09060566
Laboratory: Alpha Analytical, Inc.

Date: 8/31/09
Page: 1 of 1
Reviewer: JVG
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 6/04/09
IIa.	Initial calibration	A	r²
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	SW	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	FB = FB060409 from TRX09060567

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

Validated Samples: Soil

1	RSAJ3-0.5B	11		21		31	
2	RSAJ3-0.5BMS	12		22		32	
3	RSAJ3-0.5BMSD	13		23		33	
4	MBLK - 22155	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:

VALIDATION FINDINGS WORKSHEET

METHOD: ____GC ___✓HPLC

8310	8330	8151	8141	8141(Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	Organic Acids	
P. Pyrene	P.		P. Fenthion	A. Dimethyl phosphorodithioic acid	
Q.	Q		Q. Parathion-ethyl	B. Benzene sulfonic acid	
R.			R. Trichloronate	C. Phthalic acid	
S.			S. Merphos	D. Diethyl phosphorodithioic acid	
			T. Stirofos	E. 4-chlorobenzenesulfonic acid	
			U. Tokuthion		

Notes:_____

LDC #: 21423H47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: JVG
2nd Reviewer: Q

METHOD: __ GC ✓ HPLC

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

(Y) N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG?
(Y) N N/A Was an MS/MSD analyzed every 20 samples for each matrix or whenever a sample extraction was performed?
Y (N) N/A Were the MS/MSD percent recoveries (%R) and relative percent differences (RPD) within QC limits?

#	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	2/3	E	28 (60-140)	29 (60-140)	( )	1	No qual (LCS in)
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 4, 2009

LDC Report Date: September 2, 2009

Matrix: Water

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09060567

Sample Identification

M-5AB
FB060409

Introduction

This data review covers 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

Sample FB060409 was identified as a field blank. No organic acid contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09060567	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09060567

SDG	Sample	Compound	Flag	A or P	Reason
TRX09060567	M-5AB FB060409	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09060567

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09060567

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423I47
SDG #: TRX09060567
Laboratory: Alpha Analytical, Inc.

Date: 8/31/09
Page: 1 of 1
Reviewer: IVG
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 6/04/09
IIa.	Initial calibration	A	r²
IIb.	Calibration verification/ICV	A	CCV ≤ 20 % ICV ≤ 30 %
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	A	09060456-01
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	FB = 2

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

Validated Samples: Water

+							
1	M-5AB	11		21		31	
2	FB060409	12		22		32	
3	MBLK-22184	13		23		33	
4		14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 5, 2009

LDC Report Date: September 2, 2009

Matrix: Water

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09060840

Sample Identification

M-23B
M-23009B

Introduction

This data review covers 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09060840	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples M-23B and M-23009B were identified as field duplicates. No organic acids were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09060840

SDG	Sample	Compound	Flag	A or P	Reason
TRX09060840	M-23B M-23009B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09060840

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09060840

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423J47
SDG #: TRX09060840
Laboratory: Alpha Analytical, Inc.

Date: 9/01/09
Page: 1 of 1
Reviewer: JV6
2nd Reviewer: [signature]

METHOD: HPLC Organic Acids (HPLC Method)

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: 6/05/09
IIa.	Initial calibration	A	r ✓
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	A	09060456-01
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D = 1, ✓
X.	Field blanks	N	

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

Validated Samples: Water

1	M-23B	11		21		31	
2	M-23009B	12		22		32	
3	MBLK - 22184	13		23		33	
4		14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 9 through June 17, 2009

LDC Report Date: September 2, 2009

Matrix: Soil

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09061850

Sample Identification

SA35-0.5B
SA176-0.5B
SA166-0.5B
SA182-0.5B
SA85-0.5B
SA92-0.5B
SA85-0.5BMS
SA85-0.5BMSD

Introduction

This data review covers 8 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09061850	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09061850

SDG	Sample	Compound	Flag	A or P	Reason
TRX09061850	SA35-0.5B SA176-0.5B SA166-0.5B SA182-0.5B SA85-0.5B SA92-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09061850

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09061850

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423K47
SDG #: TRX09061850
Laboratory: Alpha Analytical, Inc.

Date: 8/31/09
Page: 1 of 1
Reviewer: JK
2nd Reviewer: C

METHOD: HPLC Organic Acids (HPLC Method)

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: 6/09 - 17/09
IIa.	Initial calibration	A	r²
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	N	

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

Validated Samples: Soil

1	SA35-0.5B	11	MOK - 22257	21		31	
2	SA176-0.5B	12		22		32	
3	SA166-0.5B	13		23		33	
4	SA182-0.5B	14		24		34	
5	SA85-0.5B	15		25		35	
6	SA92-0.5B	16		26		36	
7	SA85-0.5BMS	17		27		37	
8	SA85-0.5BMSD	18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 8 through June 17, 2009

LDC Report Date: September 2, 2009

Matrix: Water

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09061951

Sample Identification

M-44B
M-6AB
M-142B
M-39B
M-123B
M-123009B
M-44BMS
M-44BMSD

Introduction

This data review covers 8 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09061951	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples M-123B and M-123009B were identified as field duplicates. No organic acids were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09061951

SDG	Sample	Compound	Flag	A or P	Reason
TRX09061951	M-44B M-6AB M-142B M-39B M-123B M-123009B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09061951

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09061951

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423L47
SDG #: TRX09061951
Laboratory: Alpha Analytical, Inc.

Date: 8/31/09
Page: 1 of 1
Reviewer: AV
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 6/08-17/09
IIa.	Initial calibration	A	r
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D = 5, 6
X.	Field blanks	N	

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

Validated Samples: Water

1	M-44B	11	MDLK-22256	21		31	
2	M-6AB	12		22		32	
3	M-142B	13		23		33	
4	M-39B	14		24		34	
5	M-123B D	15		25		35	
6	M-123009B D	16		26		36	
7	M-44BMS	17		27		37	
8	M-44BMSD	18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 18 through July 1, 2009

LDC Report Date: September 1, 2009

Matrix: Soil

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09070755

Sample Identification

SA86-0.5B
SA129-0.5B
SA106-0.5B
SA82-0.5B
SA82-10B
SA82-29B
SA82-0.5BMS
SA82-0.5BMSD

Introduction

This data review covers 8 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. 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 relative percent differences (RPD) were not within QC limits for one compound, the MS/MSD percent recoveries (%R) were within QC limits and no data were qualified.

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09070755	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09070755

SDG	Sample	Compound	Flag	A or P	Reason
TRX09070755	SA86-0.5B SA129-0.5B SA106-0.5B SA82-0.5B SA82-10B SA82-29B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09070755

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09070755

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423M47
SDG #: TRX09070755
Laboratory: Alpha Analytical, Inc.

Date: 9/01/09
Page: 1 of 1
Reviewer: SVG
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 6/18 - 7/01/09
IIa.	Initial calibration	A	rr
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	SW	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	N	

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

Validated Samples: Soil

1	SA86-0.5B	11	MBLK-22316	21		31	
2	SA129-0.5B	12		22		32	
3	SA106-0.5B	13		23		33	
4	SA82-0.5B	14		24		34	
5	SA82-10B	15		25		35	
6	SA82-29B	16		26		36	
7	SA82-0.5BMS	17		27		37	
8	SA82-0.5BMSD	18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

VALIDATION FINDINGS WORKSHEET

METHOD: ____GC ___✓HPLC

8310	8330	8151	8141	8141(Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos	organic Acids	
P. Pyrene	P.		P. Fenthion	A. Dimethyl phosphorodithioic acid	
Q.	Q		Q. Parathion-ethyl	B. Benzene sulfonic acid	
R.			R. Trichloronate	C. Phthalic acid	
S.			S. Merphos	D. Diethyl phosphorodithioic acid	
			T. Stirofos	E. 4-chlorobenzenesulfonic acid	
			U. Tokuthion		

Notes: _____

LDC #: 21423 M47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: JVG
2nd Reviewer: e

METHOD: __ GC ✓ HPLC

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

(Y) N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG?
(Y) N N/A Was an MS/MSD analyzed every 20 samples for each matrix or whenever a sample extraction was performed?
Y (N) N/A Were the MS/MSD percent recoveries (%R) and relative percent differences (RPD) within QC limits?

#	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	7/8	D	( )	( )	21.7 (20)	4	No qual (MS/MSD in)
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
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			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: June 19 through June 29, 2009

LDC Report Date: September 2, 2009

Matrix: Water

Parameters: Organic Acids

Validation Level: Stage 4

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09071051

Sample Identification

M-34B
M-125B
EB062609-SO
M-111AB
EB062909-GW
M-125BMS
M-125BMSD

Introduction

This data review covers 7 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

Retention time windows were evaluated and considered technically acceptable.

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

Retention times (RT) of all compounds in the calibration standards were within QC limits.

III. Blanks

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

Samples EB062609-SO and EB062909-GW were identified as equipment blanks. No organic acid contaminants were found in these blanks.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

All target compound identifications were within validation criteria.

VI. Project Quantitation Limit

All project quantitation limits were within validation criteria.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09071051	All compounds reported below the PQL.	J (all detects)	A

VII. System Performance

The system performance was acceptable.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09071051

SDG	Sample	Compound	Flag	A or P	Reason
TRX09071051	M-34B M-125B EB062609-SO M-111AB EB062909-GW	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09071051

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09071051

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET

LDC #: 21423N47
SDG #: TRX09071051
Laboratory: Alpha Analytical, Inc.

Stage ~~2B~~ 4

Date: 9/01/09
Page: 1 of 1
Reviewer: SV6
2nd Reviewer: [illegible]

METHOD: HPLC Organic Acids (HPLC Method)

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: 6/19 - 29 /09
IIa.	Initial calibration	A	rr
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	EB = 3 5

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

Validated Samples: Water

1	M-34B	11	MBLK - 22333	21		31	
2	M-125B	12		22		32	
3	EB062609-SO	13		23		33	
4	M-111AB	14		24		34	
5	EB062909-GW	15		25		35	
6	M-125BMS	16		26		36	
7	M-125BMSD	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 21423 N47
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JV6
2nd Reviewer: [illegible]

Method: GC / HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Were all percent relative standard deviations (%RSD) ≤ 20%?			✓	
Was a curve fit used for evaluation?	✓			
Did the initial calibration meet the curve fit acceptance criteria of ≥ 0.990?	✓			
Were the RT windows properly established?	✓			
IV. Continuing calibration				
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 15%.0 or percent recoveries 85-115%?	✓			
Were all the retention times within the acceptance windows?	✓			
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 the QC limits?			✓	
If the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R outside of criteria?			✓	
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?	✓			
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?			✓	

LDC #: 21423 N47
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVG
2nd Reviewer:

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

LDC # 21423N7
SDG# See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: Q

METHOD: HPLC

Parameter: 4-Chlorobenzenesulfonic acid

Date	Detector	Compound	X Conc (ppm)	Y Area	Y^2		RF
6/02 to 6/03/09	UV	4-Chlorobenzenesulfonic acid	0.025	105332		RF	4213280
	HPLC 3		0.050	201649			4032980
			0.100	464100			4641000
			0.250	1152183			4608732
			0.500	2262016			4524032
			1.000	4485504			4485504
			1.500	6696299			4464199
			2.000	8851547			4425774
						Ave	4424438

Regression Output: / Reported

Constant		-4.19374E-003	c =	-0.004194
Std Err of Y Est		0.00735		
R Squared		0.999917	r 2	0.999917
No. of Observations		8.00000		
Degrees of Freedom		6.00000		
X Coefficient(s)	2.254E-007	-9.41E-015	b =	2.254E-007

LDC #: 21423N7
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Page: 1 of 1
Reviewer: JVG
2nd Reviewer:

METHOD: GC_____HPLC ✓

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

% Difference = 100 * (ave. CF - CF)/ave. CF
CF = A/C

Where: ave. CF = initial calibration average CF
CF = continuing calibration CF
A = Area of compound
C = Concentration of compound

#	Standard ID	Calibration Date	Compound	Average CF(ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %R	Recalculated %R
1	B466S001.D14	7/12/09	4-CBSA	1.00	0.991	0.991	99.1	99.1
2	B467B001.D07	7/12/09		0.500	0.501	0.501	100.2	100.2
3								
4								

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

LDC #: 21423N47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: JV6
2nd Reviewer: R

METHOD: __ GC ✓ HPLC

The percent recoveries (%R) and relative percent differences (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 SC = Sample concentration
SA = Spike added

RPD =(({SSCMS - SSCMSD} * 2) / (SSCMS + SSCMSD))*100 MS = Matrix spike MSD = Matrix spike duplicate

MS/MSD samples: 6/7

Compound	Spike Added (mg/L)		Sample Conc. (mg/L)	Spike Sample Concentration (mg/L)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	---	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
~~Gasoline~~ p-CBSA (8015)	1.0	1.0	0.224	1.226	1.234	100	100	101	101	0.7	0.7
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											

Comments: Refer to 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 #: 21423N47
SDG #: See Cover

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

Reviewer: JVB
2nd Reviewer: Q

METHOD: __ GC __HPLC

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

% Recovery = 100* (SSC-SC)/SA
RPD = | LCS - LCSD | * 2/(LCS + LCSD)

Where: SSC = Spiked sample concentration
SA = Spike added
LCS = Laboratory control sample percent recovery
SC = Concentration
LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples:_____

Compound	Spike Added (mg/L)		Spiked Sample Concentration (mg/L)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
~~Gasoline (8015)~~ p-CBSA	0.5	NA	0.504	NA	101	101				
Diesel (8015)										
Benzene (8021B)										
Methane (RSK-175)										
2,4-D (8151)										
Dinoseb (8151)										
Naphthalene (8310)										
Anthracene (8310)										
HMX (8330)										
2,4,6-Trinitrotoluene (8330)										

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

LDC #: 21423 N47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

METHOD: __ GC __ HPLC

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 within 10% of the reported results?

Concentration= $\frac{(A)(Fv)(Df)}{(RF)(Vs \text{ or } Ws)(\%S/100)}$

A= Area or height of the compound to be measured
Fv= Final Volume of extract
Df= Dilution Factor
RF= Average response factor of the compound In the initial calibration
Vs= Initial volume of the sample
Ws= Initial weight of the sample
%S= Percent Solid

Example:

Sample ID. # 2 Compound Name p-CBSA

Concentration = $\frac{[(515\,426)(2.254e-7)] - 0.004194)\,2}{} = 0.224$ mg/L

#	Sample ID	Compound	Reported Concentrations ( )	Recalculated Results Concentrations ( )	Qualifications

Comments: _____

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: July 9 through July 13, 2009

LDC Report Date: September 11, 2009

Matrix: Soil

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09071450

Sample Identification

SA85-33B
RSAM2-10B
RSAM2-35B
SA35-10B
SA35-32B
SA35009-32B
RSAM3-30B
SA176-10B
SA176009-37B
SA176-37B
SA176-37BMS
SA176-37BMSD

Introduction

This data review covers 12 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09071450	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples SA35-32B and SA35009-32B and samples SA176009-37B and SA176-37B were identified as field duplicates. No organic acids were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09071450

SDG	Sample	Compound	Flag	A or P	Reason
TRX09071450	SA85-33B RSAM2-10B RSAM2-35B SA35-10B SA35-32B SA35009-32B RSAM3-30B SA176-10B SA176009-37B SA176-37B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09071450

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09071450

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423O47
SDG #: TRX09071450
Laboratory: Alpha Analytical, Inc.

Date: 8/31/09
Page: 1 of 1
Reviewer: VG
2nd Reviewer: [illegible]

METHOD: HPLC Organic Acids (HPLC Method)

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: 7/09 - 13/09
IIa.	Initial calibration	A	r ✓
IIb.	Calibration verification/ICV	A	CCV ≤ 20 % ICV ≤ 30 %
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D_1 = 5, 6 D_2 = 9, 10
X.	Field blanks	ND	~~EB = EB071009-SO from TRX2967204~~

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

Validated Samples: SOIL

1	SA85-33B	11	SA176-37BMS	21	MBLK - 22347	31	
2	RSAM2-10B	12	SA176-37BMSD	22		32	
3	RSAM2-35B	13		23		33	
4	SA35-10B	14		24		34	
5	SA35-32B D_1	15		25		35	
6	SA3509-32B D_1	16		26		36	
7	RSAM3-30B	17		27		37	
8	SA176-10B	18		28		38	
9	SA176009-37B D_2	19		29		39	
10	SA176-37B D_2	20		30		40	

Notes: _____

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: July 10 through July 17, 2009

LDC Report Date: December 3, 2009

Matrix: Water

Parameters: Organic Acids

Validation Level: Stage 4

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09072041

Sample Identification

EB071009-SO
TR-8B
M-97B
TR-6B
EB-071709-GW
EB071009-SOMS
EB071009-SOMSD

Introduction

This data review covers 7 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

Retention time windows were evaluated and considered technically acceptable.

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

Retention times (RT) of all compounds in the calibration standards were within QC limits.

III. Blanks

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

Samples EB-071709-GW and EB071009-SO were identified as equipment blanks. No organic acid contaminants were found in these blanks.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

All target compound identifications were within validation criteria.

VI. Project Quantitation Limit

All project quantitation limits were within validation criteria.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09072041	All compounds reported below the PQL	J (all detects)	A

VII. System Performance

The system performance was acceptable.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09072041

SDG	Sample	Compound	Flag	A or P	Reason
TRX09072041	EB071009-SO TR-6B M-97B TR-6B EB-071709-GW	All compounds reported below the PQL	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09072041

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09072041

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21423P47 **VALIDATION COMPLETENESS WORKSHEET** Date: 9/01/09

SDG #: TRX09072041 Stage 2B Page: 1 of 1

Laboratory: Alpha Analytical, Inc. Reviewer: JG

2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 7/10 - 17/09
IIa	Initial calibration	A	r²
IIb	Calibration verification/ICV	A	CCV ≤ 20 % ICV ≤ 30 %
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	A	
X.	Field blanks	ND	EB = 5 1

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

Validated Samples: water

1	EB071009-SO	11	MBLK - 22316	21		31	
2	TR-66	12		22		32	
3	M-97B	13		23		33	
4	TR-66	14		24		34	
5	EB-071709-GW	15		25		35	
6	EB071009-SOMS	16		25		36	
7	EB071009-SOMSD	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

LDC #: 21423 P47
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Page: 1 of 2
Reviewer: JVG
2nd Reviewer:

Method: ____ GC ✓ HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Were all percent relative standard deviations (%RSD) < 20%?		✓		
Was a curve fit used for evaluation?	✓			
Did the initial calibration meet the curve fit acceptance criteria of > 0.990?	✓			
Were the RT windows properly established?	✓			
IV. Continuing calibration				
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) < 20%.0 or percent recoveries 80-120%?	✓			
Were all the retention times within the acceptance windows?	✓			
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 the QC limits?			✓	
If the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R outside of criteria?			✓	
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?	✓			
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?			✓	

LDC #: 24423P47
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JW
2nd Reviewer:

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

LDC # 21423 P47
SDG# See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: R

METHOD: HPLC

Parameter: 4-Chlorobenzenesulfonic acid

Date	Detector	Compound	X Conc (ppm)	Y Area	Y^2
6/02 to 6/03/09	UV HPLC 3	4-Chlorobenzenesulfonic acid	0.025	105332	
			0.050	201649	
			0.100	464100	
			0.250	1152183	
			0.500	2262016	
			1.000	4485504	
			1.500	6696299	
			2.000	8851547	

RF	4213280
	4032980
	4641000
	4608732
	4524032
	4485504
	4464199
	4425774
Ave	4424436

Regression Output:			Reported	
Constant		-4.19374E-003	a =	-0.004194
Std Err of Y Est		0.00735		
R Squared		0.999917	r 2	0.999917
No. of Observations		8.00000		
Degrees of Freedom		6.00000		
X Coefficient(s)	2.254E-007	-9.41E-016	b =	2.254E-007

LDC #: 21423P47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer: JVG
2nd Reviewer: R

METHOD: GC _____ HPLC ✓

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

% Difference = 100 * (ave. CF - CF)/ave. CF
CF = A/C

Where: ave. CF = initial calibration average CF
CF = continuing calibration CF
A = Area of compound
C = Concentration of compound

#	Standard ID	Calibration Date	Compound	Average CF(ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %R	Recalculated %R
1	B461000l.D01	7/20/09	9-CBSA	0.500	0.499	0.499	99.7	99.7
2	B467100l.D12	7/20/09	〃	1.000	1.023	1.023	102.3	102.3
3								
4								

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

LDC #: 21423 P47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: AVL
2nd Reviewer: R

METHOD: __ GC / HPLC

The percent recoveries (%R) and relative percent differences (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 SC = Sample concentration
SA = Spike added
RPD =(((SSCMS - SSCMSD) * 2) / (SSCMS + SSCMSD))*100 MS = Matrix spike MSD = Matrix spike duplicate

MS/MSD samples: 6/7

Compound	Spike Added (mg/L)		Sample Conc. (mg/L)	Spike Sample Concentration (mg/L)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	—	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinosab (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											
4-CBSA (HPLC)	1.0	1.0	0	1.004	1.014	100	100	101	101	1.3	1.3

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 #: 21437p47
SDG #: See Cover

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

Page: 1 of 1
Reviewer: JVL
2nd Reviewer: R

METHOD: __ GC ✓ HPLC

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

% Recovery = 100* (SSC-SC)/SA
RPD = | LCS - LCSD | * 2/(LCS + LCSD)

Where: SSC = Spiked sample concentration
SA = Spike added
LCS = Laboratory control sample percent recovery
SC = Concentration
LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: LS-22368

Compound	Spike Added (mg/L)		Spiked Sample Concentration (mg/L)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)										
Diesel (8015)										
Benzene (8021B)										
Methane (RSK-175)										
2,4-D (8151)										
Dinoseb (8151)										
Naphthalene (8310)										
Anthracene (8310)										
HMX (8330)										
2,4,6-Trinitrotoluene (8330)										
4-CBSA (HPLC)	0.5	NA	0.497	NA	99	99	---		---	

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

LDC #: 21423 P47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
Reviewer: JW
2nd Reviewer: R

METHOD: __ GC __/HPLC

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 within 10% of the reported results?

Concentration= (A)(Fv)(Df) / (RF)(Vo or Ws)(%S/100)

A= Area or height of the compound to be measured
Fv= Final Volume of extract
Df= Dilution Factor
RF= Average response factor of the compound in the initial calibration
Vo= Initial volume of the sample
Ws= Initial weight of the sample
%S= Percent Solid

Example:

Sample ID.____ Compound Name MD

Concentration = ____

#	Sample ID	Compound	Reported Concentrations	Recalculated Results Concentrations	Qualifications

Comments: ____

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: July 21 through July 22, 2009

LDC Report Date: September 8, 2009

Matrix: Soil/Water

Parameters: Organic Acids

Validation Level: Stage 4

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09072352

Sample Identification

EB072109-SO
FB072109-SO
SA166-10B
SA166-31B
SA182-10B
SA182-38B
EB072209-SO
EB072109-SOMS
EB072109-SOMSD
SA166-10BMS
SA166-10BMSD

Introduction

This data review covers 6 soil samples and 5 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

Retention time windows were evaluated and considered technically acceptable.

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

Retention times (RT) of all compounds in the calibration standards were within QC limits.

III. Blanks

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

Samples EB072109-SO and EB072209-SO were identified as equipment blanks. No organic acid contaminants were found in these blanks.

Sample FB072109-SO was identified as a field blank. No organic acid contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

All target compound identifications were within validation criteria.

VI. Project Quantitation Limit

All project quantitation limits were within validation criteria.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09072352	All compounds reported below the PQL.	J (all detects)	A

VII. System Performance

The system performance was acceptable.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09072352

SDG	Sample	Compound	Flag	A or P	Reason
TRX09072352	EB072109-SO FB072109-SO SA166-10B SA166-31B SA182-10B SA182-38B EB072209-SO	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09072352

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09072352

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET

LDC #: 21423Q47
SDG #: TRX09072352
Laboratory: Alpha Analytical, Inc.

Stage ~~2B~~ 4

Date: 9/01/09
Page: 1 of 1
Reviewer: JV6
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 7/21-22/09
IIa.	Initial calibration	A	rr
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not req'd.
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	EB = 1, 7 FB = 2

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

Validated Samples: Water + Soil

1	EB072109-SO	W	11	SA166-10BMSD	S	21	MBLK-22404	31	
2	FB072109-SO		12			22	MBLK-22408	32	
3	SA166-10B	S	13			23		33	
4	SA166-31B		14			24		34	
5	SA182-10B		15			25		35	
6	SA182-38B		16			26		36	
7	EB072209-SO	W	17			27		37	
8	EB072109-SOMS		18			28		38	
9	EB072109-SOMSD		19			29		39	
10	SA166-10BMS	S	20			30		40	

Notes:

LDC #: 21423 Q 47
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JV6
2nd Reviewer:

Method: ____ GC ✓ HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Were all percent relative standard deviations (%RSD) ≤ 20%?			✓	
Was a curve fit used for evaluation?	✓			
Did the initial calibration meet the curve fit acceptance criteria of ≥ 0.990?	✓			
Were the RT windows properly established?	✓			
IV. Continuing calibration				
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 20%.0 or percent recoveries 80-116%?	✓			
Were all the retention times within the acceptance windows?	✓			
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 the QC limits?			✓	
If the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R outside of criteria?			✓	
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?	✓			
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?			✓	

LDC #: 21423Q47
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVC
2nd Reviewer:

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

LDC # 21423 Q 47
SDG# See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JV
2nd Reviewer:

METHOD: HPLC

Parameter: 4-Chlorobenzenesulfonic acid

Date	Detector	Compound	X Conc (ppm)	Y Area	Y^2	
6/02 to 6/03/09	UV HPLC 3	4-Chlorobenzenesulfonic acid	0.025	105332		RF 4213280
			0.050	201649		4032980
			0.100	464100		4641000
			0.250	1152183		4608732
			0.500	2262016		4524032
			1.000	4485504		4485504
			1.500	6696299		4464199
			2.000	8851547		4425774
						Ave 4424438

Regression Output:			Reported	
Constant		-4.19374E-003	c =	-0.004194
Std Err of Y Est		0.00735		
R Squared		0.999917	r 2	0.999917
No. of Observations		8.00000		
Degrees of Freedom		6.00000		
X Coefficient(s)	2.254E-007	-9.41E-015	b =	2.254E-007

LDC #: 21423 Q47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer: JVC
2nd Reviewer: [illegible]

METHOD: GC_____HPLC ✓

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

% Difference = 100 * (ave. CF - CF)/ave. CF
CF = A/C

Where: ave. CF = initial calibration average CF
CF = continuing calibration CF
A = Area of compound
C = Concentration of compound

#	Standard ID	Calibration Date	Compound	Average CF(ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %R	Recalculated %R
1	B4701001.D01	7/24/09 10:43	p-CBSA	0.5	0.506	0.506	101.1	101.1
2	B4710001.D10	7/24/09 20:19		1.0	1.016	1.016	101.0	101.0
3	B4719001.D09	7/25/09 5:33		0.50	0.505	0.505	101.0	101.0
4	B4732001.D37	7/25/09 19:09	↓	1.0	1.021	1.021	102.1	102.1

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

LDC #: 21423Q47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

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

METHOD: __ GC / HPLC

The percent recoveries (%R) and relative percent differences (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 SC = Sample concentration
SA = Spike added
RPD =(({SSCMS - SSCMSD} * 2) / (SSCMS + SSCMSD))*100 MS = Matrix spike MSD = Matrix spike duplicate

MS/MSD samples: 10/11

Compound	Spike Added (mg/kg)		Sample Conc. (mg/kg)	Spike Sample Concentration (mg/kg)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	-- 0	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											
4-CBSA (Org. Acids by HPLC)	2.0	2.0	0	1.91	1.97	95	95	99	99	3.3	3.1

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 #: 21423 Q47
SDG #: See Cover

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

Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

METHOD: __ GC / HPLC

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

% Recovery = 100* (SSC-SC)/SA
RPD = | LCS - LCSD | * 2/(LCS + LCSD)

Where: SSC = Spiked sample concentration
SA = Spike added
LCS = Laboratory control sample percent recovery
SC = Concentration
LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: LCS – 22400

Compound	Spike Added (mg/kg)		Spiked Sample Concentration (mg/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)										
Diesel (8015)										
Benzene (8021B)										
Methane (RSK-175)										
2,4-D (8151)										
Dinoseb (8151)										
Naphthalene (8310)										
Anthracene (8310)										
HMX (8330)										
2,4,6-Trinitrotoluene (8330)										
4-CBSA (org. Acids by HPLC)	2.0	NA	1.98	NA	99	99				

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

LDC #: 21423Q47
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer: JVG
2nd Reviewer: [illegible]

METHOD: __ GC __ HPLC

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 within 10% of the reported results?

Concentration= $\frac{(A)(Fv)(Df)}{(RF)(Vs \text{ or } Ws)(\%S/100)}$

A= Area or height of the compound to be measured
Fv= Final Volume of extract
Df= Dilution Factor
RF= Average response factor of the compound In the initial calibration
Vs= Initial volume of the sample
Ws= Initial weight of the sample
%S= Percent Solid

Example:

Sample ID._____ Compound Name ND

Concentration = _____

#	Sample ID	Compound	Reported Concentrations ( )	Recalculated Results Concentrations ( )	Qualifications

Comments: _____

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: July 23 through July 24, 2009

LDC Report Date: September 1, 2009

Matrix: Soil/Water

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09072741

Sample Identification

EB072309-SO
SA131-0.5B
SA131009-0.5B
SA131-10B
SA131-27B
EB072409-SO
RSAH3-0.5B
RSAH3009-0.5B
RSAH3-32B
EB072309-SOMS
EB072309-SOMSD
RSAH3009-0.5BMS
RSAH3009-0.5BMSD

Introduction

This data review covers 9 soil samples and 4 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

Samples EB072309-SO and EB072409-SO were identified as equipment blanks. No organic acid contaminants were found in these blanks.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09072741	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples SA131-0.5B and SA131009-0.5B and samples RSAH3-0.5B and RSAH3009-0.5B were identified as field duplicates. No organic acids were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09072741

SDG	Sample	Compound	Flag	A or P	Reason
TRX09072741	EB072309-SO SA131-0.5B SA131009-0.5B SA131-10B SA131-27B EB072409-SO RSAH3-0.5B RSAH3009-0.5B RSAH3-32B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09072741

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09072741

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423R47
SDG #: TRX09072741
Laboratory: Alpha Analytical, Inc.

Date: 9/01/09
Page: 1 of 1
Reviewer: NG
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 7/23-24/09
IIa.	Initial calibration	A	rr
IIb.	Calibration verification/ICV	A	CCV ≤ 20 % ICV ≤ 30 %
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D_1 = 2, 3 D_2 = 7, 8
X.	Field blanks	ND	EB = 1, 6,

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

Validated Samples: Water + Soil

1	EB072309-SO	W	11	EB072309-SOMSD	W	21	MBLK-22410		31		
2	SA131-0.5B	D, S	12	RSAH3009-0.5BMS	S	22	MBLK-22409		32		
3	SA131009-0.5B	D,	13	RSAH3009-0.5BMSD		23			33		
4	SA131-10B		14			24			34		
5	SA131-27B		15			25			35		
6	EB072409-SO	W	16			26			36		
7	RSAH3-0.5B	D	S	17			27			37	
8	RSAH3009-0.5B	D		18			28			38	
9	RSAH3-32B			19			29			39	
10	EB072309-SOMS	W	20				30			40	

Notes:

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: July 29, 2009

LDC Report Date: September 10, 2009

Matrix: Soil/Water

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09073051

Sample Identification

FB072909-SO
SA73-0.5B
SA73-30B
RSAU4-20
RSAU4-50
SA73-0.5BMS
SA73-0.5BMSD

Introduction

This data review covers 6 soil samples and one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

Sample FB072909-SO was identified as a field blank. No organic acid contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09073051	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09073051

SDG	Sample	Compound	Flag	A or P	Reason
TRX09073051	FB072909-SO SA73-0.5B SA73-30B RSAU4-20 RSAU4-50	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09073051

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09073051

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423S47
SDG #: TRX09073051
Laboratory: Alpha Analytical, Inc.

Date: 9/10/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer:

METHOD: HPLC Organic Acids (HPLC Method)

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: 7/29/09
IIa.	Initial calibration	A	r2
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	FB = 1

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

Validated Samples: Water + Soil

1	FB072909-SO W	11	MBLK-22436	21		31	
2	SA73-0.5B S	12	MBLK-22444	22		32	
3	SA73-30B	13		23		33	
4	RSAU4-20	14		24		34	
5	RSAU4-50	15		25		35	
6	SA73-0.5BMS	16		26		36	
7	SA73-0.5BMSD	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: July 31 through August 3, 2009

LDC Report Date: September 11, 2009

Matrix: Soil/Water

Parameters: Organic Acids

Validation Level: Stage 2B

Laboratory: Alpha Analytical, Inc.

Sample Delivery Group (SDG): TRX09080450

Sample Identification

RSAU4-20BSPLP
RSAU4-20BSPLPpH(SPLP)
RSAU4-20BSPLP(DI SPLP)
RSAU4-50BSPLP
RSAU4-50BSPLPpH(SPLP)
RSAU4-50BSPLP(DI SPLP)
RSAJ3-10BSPLP
RSAJ3-10BSPLPpH(SPLP)
RSAJ3-10BSPLP(DI SPLP)
RSAJ3-29BSPLP
RSAJ3-29BSPLPpH(SPLP)
RSAJ3-29BSPLP(DI SPLP)
FB080309-SO
RSAJ3-29BSPLPMS
RSAJ3-29BSPLPMSD
FB080309-SOMS
FB080309-SOMSD

Introduction

This data review covers 14 soil samples and 3 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per HPLC Method for Organic Acids.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed for the primary (quantitation) column and confirmation column as required by this method.

A curve fit, based on the initial calibration, was established for quantitation. The coefficient of determination (r^2) was greater than or equal to 0.990 .

b. Calibration Verification

Calibration verification was performed at the required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 30.0% for all compounds.

III. Blanks

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

Sample FB080309-SO was identified as a field blank. No organic acid contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were not required by the method.

b. Matrix Spike/(Matrix Spike) Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG TRX09080450	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Data Qualification Summary - SDG TRX09080450

SDG	Sample	Compound	Flag	A or P	Reason
TRX09080450	RSAU4-20BSPLP RSAU4-20BSPLPpH(SPLP) RSAU4-20BSPLP(DI SPLP) RSAU4-50BSPLP RSAU4-50BSPLPpH(SPLP) RSAU4-50BSPLP(DI SPLP) RSAJ3-10BSPLP RSAJ3-10BSPLPpH(SPLP) RSAJ3-10BSPLP(DI SPLP) RSAJ3-29BSPLP RSAJ3-29BSPLPpH(SPLP) RSAJ3-29BSPLP(DI SPLP) FB080309-SO	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Laboratory Blank Data Qualification Summary - SDG TRX09080450

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Organic Acids - Field Blank Data Qualification Summary - SDG TRX09080450

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 21423T47
SDG #: TRX09080450
Laboratory: Alpha Analytical, Inc.

Date: 9/10/09
Page: 1 of 1
Reviewer: JVC
2nd Reviewer: [signature]

METHOD: HPLC Organic Acids (HPLC Method)

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: 7/31 - 8/03/09
IIa.	Initial calibration	A	rr
IIb.	Calibration verification/ICV	A	CCV ≤ 20% ICV ≤ 30%
III.	Blanks	A	
IVa.	Surrogate recovery	N	Not reqd.
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	FB = 13

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

Validated Samples: Soil + Water

1	RSAU4-20BSPLP S	11	RSAJ3-29BSPLP(SPLP) pH S	21	MBLK-22472	31	
2	RSAU4-20BSPLP(SPLP) pH	12	RSAJ3-29BSPLP(DI SPLP)	22	MBLK-22472D	32	
3	RSAU4-20BSPLP(DI SPLP)	13	FRB080309-SO W	23	MBLK-22473	33	
4	RSAU4-50BSPLP	14	RSAJ3-29BSPLPMS S	24		34	
5	RSAU4-50BSPLP(SPLP) pH	15	RSAJ3-29BSPLPMSD	25		35	
6	RSAU4-50BSPLP(DI SPLP)	16	FRB080309-SOMS	26		36	
7	RSAJ3-10BSPLP	17	FRB080309-SOMSD	27		37	
8	RSAJ3-10BSPLP(SPLP) pH	18		28		38	
9	RSAJ3-10BSPLP(DI SPLP)	19		29		39	
10	RSAJ3-29BSPLP	20		30		40	

Notes: _____