

LABORATORY DATA CONSULTANTS, INC.

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Northgate Environmental Management, Inc.

December 3, 2009

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

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 November 10, 2009. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 22106:

SDG#

Fraction

8304640, 8304641

Arsenic & Selenium

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

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

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

Sincerely,

Àrlinda T. Rauto

Operations Manager/Senior Chemist

Attachment 1

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.DC #: 22106

DG #: 8304640, 8304641

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

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		i de la	an din	
Were all qualifiers from the validation report populated into the EDD?	Х			
III. EDD Láb Anomalies		i di	* 15 h	
Were EDD anomalies identified?	X		:	
If yes, were they corrected or documented for the client?	X			See EDD_discrepancy_ form_LDC21106_121109.doc
IV. EDD Delivery.		a a a	7	
Was the final EDD sent to the client?	Х			

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Data Validation Reports LDC #22106

Arsenic & Selenium



Laboratory Data Consultants, Inc. Data Validation Report

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

Henderson, Nevada

Collection Date: October 23, 2009

LDC Report Date: December 8, 2009

Matrix: Water

Parameters: Arsenic & Selenium

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304640

Sample Identification

M-141B M-141009B

PB102309-A3

M-141BMS

M-141BMSD

Introduction

This data review covers 5 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Arsenic and Selenium.

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

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

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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. ICPMS Tune

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

III. Calibration

An initial calibration was performed.

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

IV. Blanks

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

Method Blank ID	Analyte	Maximum Concentration	Associated Samples
ICB/CCB	Selenium	1.571 ug/L	All samples in SDG 8304640

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

Sample	Analyte	Reported Concentration	Modified Final Concentration
PB102309-A3	Selenium	1.1 ug/L	5.0U ug/L

Sample PB102309-A3 was identified as a pump blank. No metal contaminants were found in this blank with the following exceptions:

Pump Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
PB102309-A3	10/23/09	Selenium	1.1 ug/L	M-141B M-141009B

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

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. Matrix Spike Analysis

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

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

Raw data were not reviewed for this SDG.

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

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

XII. Sample Result Verification and Project Quantitation Limit

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304640	All analytes reported below the PQL.	J (all detects)	Α

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

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

	Concentra	tion (ug/L)	555	D.W			
Compound	M-141B	M-141009B	RPD (Limits)	Difference (Limits)	Flags	A or P	
Arsenic	91	92	1 (≤30)	-	-	-	
Selenium	7.6	7.6	-	0 (≤5.0)	-	-	

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Arsenic & Selenium - Data Qualification Summary - SDG 8304640

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
8304640	M-141B M-141009B PB102309-A3	All analytes reported below the PQL.	J (all detects)	А	Sample result verification (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Arsenic & Selenium - Laboratory Blank Data Qualification Summary - SDG 8304640

SDG	Sample	Analyte	Modified Final Concentration	A or P	Code
8304640	PB102309-A3	Selenium	5.0U ug/L	А	bl

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Arsenic & Selenium - Pump Blank Data Qualification Summary - SDG 8304640

No Sample Data Qualified in this SDG

Tronox Northqate Henderson ET

LDC #:	22106A4	VALIDATION COMPLETENESS WORKSHE
SDG #:	8304640	Stage 2B
Laborator	y: Test America	

Date: 12-3	09
Page: (_of_ <u></u>	
Reviewer: CZ	
2nd Reviewer:	

METHOD: As & Se (EPA SW 846 Method 6020)

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

	Validation Area		Comments
l.	Technical holding times	A	Sampling dates: 10/23/09
II.	ICP/MS Tune	A	
111.	Calibration	A	
IV.	Blanks	SW	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	msD
VII.	Duplicate Sample Analysis	\sim	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	\mathcal{N}	No+reviewed No+u+ilized
X.	Furnace Atomic Absorption QC	\mathcal{N}	NOTUTILIZED
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	SW	(C12)
XV	Field Blanks	SW	PumpBlank=3

Note:

A = Acceptable

N = Not provided/applicable

SW = See worksheet

ND = No compounds detected

R = Rinsate

FB = Field blank

D = Duplicate

TB = Trip blank EB = Equipment blank

	OVV - OCE WORKSHEET		I D - I leid blank		LD - Equipment blank
Valid	ated Samples:				
1	M-141B	11	PBW	21	31
2	M-141009B	12		22	32
3	PB102309-A3	13		23	33
4	M-141BMS	14		24	34
5	M-141BMSD	15		25	35
6		16		26	36
7		17		27	37
8		18		28	38
9		19		29	39
10		20		30	40

Notes:		

LDC #: ZCIUGATI SDG #: SELCOLOL

VALIDATION FINDINGS WORKSHEET Sample Specific Element Reference

Page: of Reviewer: 2nd reviewer:

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-3	\vee	Al, Sb(As) Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K(Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
QC45		Al, Sb(As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K(Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN',
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
·		Al. Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN,
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		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN',
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		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN',
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN',
		Analysis Method
ICP		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
ICP Trace		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
ICP-MS	W	Al, Sb(As,)Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K,(Se,)Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
GFAA		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,

Comments:	Mercury by CVAA if performed	

DC #: 22106A4 DG #: See Cover AETHOD: Trace me	106A4 e Cover race metals	DC #: <u>22106A4</u> DG #: <u>See Cover</u> IETHOD: Trace metals (EPA SW 864 Method 6010B/6020/	34 Method 6 otherwise no	.DC #: <u>22106A4</u> sDG #: <u>See Cover</u> AETHOD: Trace metals (EPA SW 864 Method 6010B/6020/7000) sample Concentration units, unless otherwise noted: <u>ug/L</u>		VALIDATION FINDINGS WORKSHE PB/ICB/CCB QUALIFIED SAMPLE Soil preparation factor applied: NA Associated Samples: All	/ALIDATION FINDINGS WORKSHEET PB/ICB/CCB QUALIFIED SAMPLES oil preparation factor applied: NA ssociated Samples: All	WORKSHEE D SAMPLES lied: NA	<u>.</u> .		Re 2nd Re	Page of Reviewer: CA	\[\frac{1}{5}\rightarrow\rightarr
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Analyte	Maximum PB*	Maximum Maximum PB ^a ICB/CCB ^a	Maximum ICB/CCB ^a	Action Limit	က								
Se			1.571		1.1 / 5.0								-

Se 1.571 1.175.0 1.175

LDC #: 22106A4 SDG #: 8304640

VALIDATION FINDINGS WORKSHEET

Field Blanks

Page: _ Reviewer: 2nd Reviewer:

METHOD: Trace Metals (EPA SW846 6010B/7000)

Were target analytes detected in the field blanks? Were field blanks identified in this SDG? N N/A

Associated sample units: __ug/L_ Blank units: ug/L

Soil factor applied NA Sampling date: 10/23/09

Field blank type: (circle one) Field Blank / Rinsate / Other (Pump Blank

Reason: bo

Associated Samples:

Sample Identification												
Sampl			·									
Analyte Blank ID	ω											
	No Qualifiers											
	Action											
Blank ID	ll .	1.1										
Analyte		Se										

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

LDC_	22106A4_
SDG	See Cover

VALIDATION FINDINGS WORKSHEET Field Duplicates

Page: \of
Reviewer:
2nd Reviewer: V

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

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

	Concentrat	ion (ug/L)	(≤30)			Qualifications
Compound	1	2	RPD	Difference	Limits	(Parent Only)
Arsenic	91	92	1			
Selenium	7.6	7.6		0	(≤5.0)	

V:\FIELD DUPLICATES\FD_inorganic\22106A4.wpd

Laboratory Data Consultants, Inc. Data Validation Report

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

Henderson, Nevada

Collection Date: October 26 through October 30, 2009

LDC Report Date: December 8, 2009

Matrix: Water

Parameters: Arsenic & Selenium

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 8304641

Sample Identification

M-139B

M-145B

M-146B

M-144B

M-138B

M-138009B

M-138BDISS

M-138009BDISS

M-137B

M-137BDISS

M-148B

EB103009-GWA4

M-139BMS

M-139BMSD

M-138BDISSMS

M-138BDISSMSD

M-137BDISSMS

M-137BDISSMSD

EB103009-GWA4MS

EB103009-GWA4MSD

Introduction

This data review covers 20 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Arsenic and Selenium.

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

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Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination.

 This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. ICPMS Tune

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

III. Calibration

An initial calibration was performed.

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

IV. Blanks

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

Sample EB103009-GWA4 was identified as an equipment blank. No metal contaminants were found in this blank.

Sample FILTB092509-A2 (from SDG 8304632) was identified as a filter blank. No metal contaminants were found in this blank with the following exceptions:

Filter Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
FILTB092509-A2	9/25/09	Selenium	2.0 ug/L	M-138BDISS M-138009BDISS M-137BDISS

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

Sample	Analyte	Reported Concentration	Modified Final Concentration
M-138BDISS	Selenium	2.4 ug/L	10U ug/L
M-138009BDISS	Selenium	2.4 ug/L	10U ug/L

Sample	Analyte	Reported Concentration	Modified Final Concentration
M-137BDISS	Selenium	2.2 ug/L	5.0U ug/L

Sample PB102309-A3 (from SDG 8304640) was identified as a pump blank. No metal contaminants were found in this blank with the following exceptions:

Pump Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
PB102309-A3	10/23/09	Selenium	1.1 ug/L	M-139B M-145B M-148B

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

Sample	Analyte	Reported Concentration	Modified Final Concentration		
M-145B	Selenium	4.0 ug/L	25U ug/L		
M-148B	Selenium	6.6 ug/L	10U ug/L		

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. Matrix Spike Analysis

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

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

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

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

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

XII. Sample Result Verification and Project Quantitation Limit

All sample result verifications were acceptable.

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 8304641	All analytes reported below the PQL.	J (all detects)	А

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

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

	Concentration (ug/L)		200	D:#		
Compound	M-138B	M-138009B	RPD (Limits)	Difference (Limits)	Flags	A or P
Arsenic	350	340	3 (≤30)	-	-	-

	Concentration (ug/L)		555	D.#		
Compound	M-138BDISS	M-138009BDISS	RPD (Limits)	Difference (Limits)	Flags	A or P
Arsenic	340	330	3 (≤30)	-	-	-

	Concentration (ug/L)		nnn.	D:#			
Compound	M-138BDISS	M-138009BDISS	RPD (Limits)	Difference (Limits)	Flags	A or P	
Selenium	2.4	2.4	-	0 (≤10)	-	-	

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Arsenic & Selenium - Data Qualification Summary - SDG 8304641

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
8304641	SA102-10BSPLP2 SA102-10BSPLP3 SA102-30BSPLP2 SA102-30BSPLP3 SA30-9BSPLP2 SA30-9BSPLP3 SA128-10BSPLP2 SA128-10BSPLP3 SA128-29BSPLP2 SA128-29BSPLP3	All analytes reported below the PQL.	J (all detects)	Α	Sample result verification (PQL) (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Arsenic & Selenium - Laboratory Blank Data Qualification Summary - SDG 8304641

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Arsenic & Selenium - Equipment Blank Data Qualification Summary - SDG 8304641

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Arsenic & Selenium - Filter Blank Data Qualification Summary - SDG 8304641

SDG	Sample	Analyte	Modified Final Concentration	A or P	Code
8304641	M-138BDISS	Selenium	10U ug/L	A	br
8304641	M-138009BDISS	Selenium	10U ug/L	А	br
8304641	M-137BDISS	Selenium	5.0U ug/L	А	br

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Arsenic & Selenium - Pump Blank Data Qualification Summary - SDG 8304641

SDG	Sample	Analyte	Modified Final Concentration	A or P	Code
8304641	M-145B	Selenium	25U ug/L	А	bp
8304641	M-148B	Selenium	10U ug/L	А	bp

Tronox Northgate Henderson

LDC #: 22106B4	VALIDATION COMPLETENESS WORKSHEET
SDG #:8304641	Stage-28 4
Laboratory: <u>Test America</u>	-

Reviewer: C 2nd Reviewer:

METHOD: As & Se (EPA SW 846 Method 6020)

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

	Validation Area		Comments
1.	Technical holding times	A	Sampling dates: \0176/09 - 10/30-09
11.	ICP/MS Tune	A	
Ш.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	MSD
VII.	Duplicate Sample Analysis	\sim	
VIII.	Laboratory Control Samples (LCS)	A	LC5
IX.	Internal Standard (ICP-MS)	A	
Χ.	Furnace Atomic Absorption QC	\sim	MOHUHINIZED
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	A	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	SW	(5,6), (7,8)
ΧV	Field Blanks	SW	EB=17, FilezBlak=FILTBO92509-AZ, PUMPBLA (5064-8304632) PBI

Note:

A = Acceptable

N = Not provided/applicable SW = See worksheet

R = Rinsate

ND = No compounds detected

FB = Field blank

D = Duplicate TB = Trip blank

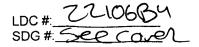
EB = Equipment blank

PB102309-A (500 xx 4304640

Validated Samples:

	<u>untor</u>				
1	M-139B	11	M-148B	21	31 PBW
2	M-145B	12_	EB103009-GWA4	22	32
3	M-146B	13	M-139BMS \	23	33
4	M-144B	14	M-139BMSD	24	34
5	M-138B	15	M-138BDISSMS	25	35
6	M-138009B	16	M-138BDISSMSD	26	36
7	M-138BDISS	17	M-137BDISSMS	27	37
8	M-138009BDISS	18	M-137BDISSMSD	28	38
9	M-137B	19	EB103009-GWA4MS	29	39
10	M-137BDISS	20	EB103009-GWA4MSD	30	40

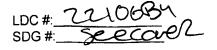
Notes:	



Page: Lof Z Reviewer: CR 2nd Reviewer: L

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

Metriod: Metals (EPA SVV 846 Metriod 6010/7000/6020)				
Validation Area	Yes	No	NA	Findings/Comments
I Technic authorise authors - Experience - E				
All technical holding times were met.				
Cooler temperature criteria was met.		(
ili Calii		, la		
Were all isotopes in the tuning solution mass resolution within 0.1 amu?	\	(
Were %RSD of isotopes in the tuning solution < 5%?		۲		
Were all instruments calibrated daily, each set-up time?				
Were the proper number of standards used?				
Were all initial and continuing calibration verification %Rs within the 90-110% (80-120% for mercury and 85-115% for cyanide) QC limits?		()		
Were all initial calibration correlation coefficients ≥ 0.995?				
ulasiro a				
Was a method blank associated with every sample in this SDG?	7			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		١	_	
De Signatura de la composición de la c				
Were ICP interference check samples performed daily?				
Were the AB solution percent recoveries (%R) with the 80-120% QC limits?		-		
Waken Kapk ayanya sa Gulahasi				
Were a matrix spike (MS) and duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD or MS/DUP. Soil / Water.)	(
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the 75-125 QC limits? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.)			
Were the MS/MSD or duplicate relative percent differences (RPD) \leq 20% for waters and \leq 35% for soil samples? A control limit of +/- RL(+/-2X RL for soil) was used for samples that were \leq 5X the RL, including when only one of the duplicate sample values were \leq 5X the RL.	<i>\</i>			
V. Patoratory, composition ples				
Was an LCS anaylzed for this SDG?				
Was an LCS analyzed per extraction batch?				
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the 80-120% QC limits for water samples and laboratory established QC limits for soils?	/			



VALIDATION FINDINGS CHECKLIST

Page: Zof Z Reviewer: ______ 2nd Reviewer: ______

	Vac	No	NA	Sindings/Comments
Validation Area	Yes	No	NA	Findings/Comments
If MSA was performed, was the correlation coefficients > 0.995?				
Do all applicable analysies have duplicate injections? (Level IV only)			_	
For sample concentrations > RL, are applicable duplicate injection RSD values < 20%? (Level IV only)			/	
Were analytical spike recoveries within the 85-115% OC limits?				
Was an ICP serial dilution analyzed if analyte concentrations were > 50X the IDL?	/			
Were all percent differences (%Ds) < 10%?	V			
Was there evidence of negative interference? If yes, professional judgement will be used to qualify the data.		/		
Were all the percent recoveries (%R) within the 30-120% of the intensity of the internal standard in the associated initial calibration?	_	<u> </u>		
If the %Rs were outside the criteria, was a reanalysis performed?				
MSEG isocoaltene assumer concerns of control to a first & Size &	14		1	
Were performance evaluation (PE) samples performed?		_		
Were the performance evaluation (PE) samples within the acceptance limits?		2		
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?				
Overall assessment of data was found to be acceptable.				
Zille aug				
Field duplicate pairs were identified in this SDG.				
Target analytes were detected in the field duplicates.	<u> </u>		 	
ranger analytes were detected in the field duplicates.				
Field blooks was idealfied in this SDC	_			
Field blanks were identified in this SDG.	1	<u> </u>		
Target analytes were detected in the field blanks.		<u> </u>	<u>L</u>	

LDC #: 22106BY SDG #: SELCOLO

VALIDATION FINDINGS WORKSHEET Sample Specific Element Reference

Page:_	1 of (
Reviewer:	<u>u</u>
2nd reviewer:	

All circled elements are applicable to each sample.

,		
Sample ID	Matrix	Target Analyte List (TAL)
1-12	\checkmark	Al, Sb.(As), Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se Ag, Na, Ti, V, Zn, Mo, B, Si, CN,
CC13-20		Al, Sb. (As) Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, (Se), Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni; K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN'
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN,
		Ai, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN ⁻
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN,
		Al. Sb. As. Ba. Be. Cd. Ca. Cr. Co. Cu. Fe. Pb. Mg. Mn. Hg. Ni. K. Se. Ag. Na. Ti. V. Zn, Mo. B. Si. CN ⁻
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN ⁻ ,
		Ai, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, π, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN ⁻ ,
		Ai. Sb. As. Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN ⁻ ,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN ⁻ ,
		Ai, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, Κ, Se, Ag, Na, Π, V, Zn, Mo, Β, Si, CN΄,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN ⁻ ,
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN ⁻
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN ⁻ ,
		Ai, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn, Mo, B, Si, CN ⁻ ,
		Analysis Method
ICP		Ai, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN ⁻ ,
ICP Trace		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,
ICP-MS		Ai, Sb(A), Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K(S), Ag, Na, Tl, V, Zn, Mo, B, Si, CN ⁻ ,
GFAA		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co. Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN,

Comments:	Mercury by CVAA if performed	

SDG #: See Cover LDC #: 22106B4

VALIDATION FINDINGS WORKSHEET

Reason Code: br

Page: of A

2nd Reviewer:

Field Blanks

Were field blanks identified in this SDG? **METHOD:** Trace Metals (EPA SW846 6010B/7000)

Were target analytes detected in the field blanks? N N/A

Associated sample units: ug/L Blank units: ug/L Associ Sampling date: 9/25/09

Associated Samples: Filter Blank Sampling date: 9/25/09 Soil factor applied NA Field blank type: (circle one) Field Blank / Rinsate / Other.

											}	
fication		-										
Sample Identification												
Sa												
	10	2.2 / 5.0										
	æ	2.4 / 10										
	7	2.4 / 10										
	Action Level											
Blank ID	FILTB092509-A2 (SDG#: 8304632)	2.0										
Analyte		Se										

LDC #: 22106B4 SDG #: 8304640

VALIDATION FINDINGS WORKSHEET Field Blanks

2nd Reviewer:

METHOD: Trace Metals (EPA SW846 6010B/7000)

Were field blanks identified in this SDG? YN N/A

Were target analytes detected in the field blanks? XN NX

Blank units: ug/L Associated sample units: ug/L

Soil factor applied NA Sampling date: 10/23/09

Pump Blank Field blank type: (circle one) Field Blank / Rinsate / Other:

Reason Code. bp

_							 		 	 	 	 		
								,						
												:		
11						:								
Associated Samples: 1, 2, 11														
iated Sam	ification										 			
Assoc	Sample Identification													
)				3										
Jump Blank														
e / Other:		11	6.6 / 10											
ank / Rinsat		2	4.0 / 25											
ne) Field B		Action Level												
ield blank type: (circle one) Field Blank / Rinsate / Other.	Blank ID	PB102309-A3 (SDG#: 8304640)	1.1											
ield blan	Analyte		Se											

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

LDC 22106B4 SDG#: See Cover

VALIDATION FINDINGS WORKSHEET Field Duplicates

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Page:[of	<u> </u>
Reviewer: <u>(</u>	
2nd Reviewer: 1	

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

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

	Concentra	tion (ug/L)	(≤30)			Qualifications
Compound	5	6	RPD	Difference	Limits	(Parent Only)
Arsenic	350	340	3			

V:\FIELD DUPLICATES\FD_inorganic\22106B4.wpd

	Concentrat	ion (ug/L)	(≤30)			Qualifications
Compound	7	8	RPD	Difference	Limits	(Parent Only)
Arsenic	340	330	3			
Selenium	2.4	2.4		0	(≤10)	

LDC #: 722/06/134 SDG #: 5660ve/L

Initial and Continuing Calibration Calculation Verification **VALIDATION FINDINGS WORKSHEET**

Page: of 2nd Reviewer: Reviewer:___

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

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

%R = Found × 100 True

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

					Recalculated	Reported	
Standard ID	Type of Analysis	Element	Found (ug/L)	True (ug/L)	%R	%R	Acceptable (Y/N)
	ICP (Initial calibration)						
	GFAA (Initial calibration)						
	CVAA (Initial calibration)						
	ICP (Continuing calibration)						
	GFAA (Continuing calibration)						
	CVAA (Continuing calibration)						
FCV	ICP/MS (Initial calibration)	AS	3c1.4	00/1	98.5	98.5) -
73)	ICP/MS (Continuing calibation)	ها	56,7	8.0	101.5	101.4	_)

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

100 # 27/08/8 4 SDG #5 CC CC PO

VALIDATION FINDINGS WORKSHEET **Level IV Recalculation Worksheet**

Page. CK 2nd Reviewer:

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

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

Where, Found = Concentration of each analyte measured in the analysis of the sample. For the matrix spike calculation, Found = SSR (spiked sample result) - SR (sample result).

True = Concentration of each analyte in the source.

%R = Found x 100 True

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

Where, S = Original sample concentration
D = Duplicate sample concentration RPD = <u>IS-DL</u> x 100 (S+D)/2 An ICP serial dilution percent difference (%D) was recalculated using the following formula:

Where, I = Initial Sample Result (mg/L) SDR = Serial Dilution Result (mg/L) (Instrument Reading x 5) %D = II-SDR x 100

					Receivilated	Reported	
Sample ID	Type of Analysis	Element	Found / S / 1 (units)	True / D / SDR (units)	%R/RPD/%D	%R/RPD/%D	Acceptable (Y/N)
ICSAB	ICS (A.C.) ICP interference check	Se	01.501	0.8	(05.	105.1)-·
53	Laboratory control sample	E	24.7	0.07	28	87	
Ĉ	Matrix spike	R	(ssr-sr)	0,07	48	98	
5/14	Duplicate	As	131	236	C450	950	
	ICP serial dilution	Æ	38,410	27.520	1.5	1.5	<u>} </u>

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

LDC #: 2210615 SDG #: Secore

VALIDATION FINDINGS WORKSHEET Sample Calculation Verification

Page;_	L	_of
Reviewer:		Q
2nd reviewer:_	<u> </u>	

METHOD: Trace Metals (EPA SW 848 Method 6010/7000)

Please Y N Y N Y N	see qu N/A N/A N/A	nave results been reported a	ing calculated correctly? ed range of the instruments and	questions are identified as "N/A". within the linear range of the ICP?
Detect followi	ed analy		As/Se	were recalculated and verified using the
Concerr	tration =	(RD)(FV)(Dil) (In. Vol.)(%S)	Recalculation:	Ran Parta: 0.80 mg/L(5) = 40 mg
RD FV In. Vol. Dil %S	= = = =	Raw data concentration Final volume (ml) Initial volume (ml) or weight (G) Dilution factor Decimal percent solids		am Date: 55,05/18/L(5) = 275.257

		T T		
Sample ID	Analyte	Reported Concentration (~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	Calculated Concentration (M L)	Acceptable (Y/N)
2	As	69	60	7
	se	4.0	4.0	L
3	A5	280	7 80	
	Se	9.0	780 9,0	7