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

June 10, 2010

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

Dear Ms. Arnold,

Enclosed are the final validation reports for the fractions listed below. These SDGs were received on May 27, 2010. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 23252:

SDG #	Fraction
280-2216-9, 280-2301-8, 280-2400-2 280-2400-9, 280-2448-13, 280-2771-1 280-2836-1, 280-2879-1, 280-2931-2 280-2960-1, 280-2995-4, 280-3059-1	Semivolatiles, Chlorinated Pesticides Metals, Perchlorate

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

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

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

Sincerely,

ERauto

Erlinda T. Rauto
Operations Manager/Senior Chemist

V:\LOGIN\TronoxNG\23252COV.wpd

EDD CHECKLIST

LDC #: 23252
SDG #: 280-2216-9, 280-2301-8, 280-2400-2, 280-2400-9
280-2448-13, 280-2771-1, 280-2836-1, 280-2879-1
280-2931-2, 280-2960-1, 280-2995-4, 280-3059-1

Reviewer: JE
2nd Reviewer: BC

Tronox Northgate Henderson Worksheet

EDD Area	Yes	No	NA	Findings/Comments
I. Completeness				
Is there an EDD for the associated Tronox validation report?	X			
II. EDD Qualifier Population				
Were all qualifiers from the validation report populated into the EDD?	X			
III. EDD Lab Anomalies				
Were EDD anomalies identified?		X		
If yes, were they corrected or documented for the client?			X	See EDD_discrepancy_ form_LDC23252_060910.doc
IV. EDD Delivery				
Was the final EDD sent to the client?	X			

Attachment 1

Stage 2B/4 **LDC #23252 (Tronox LLC-Northgate, Henderson NV / Tronox PCS)**

LDC	SDG#	DATE REC'D	(3) DATE DUE	SVOA (8270C)		Pest. (8081A)		As (6020)		Co (6020)		Pb (6020)		Mn (6020)		Mg (6020)		CLO_4 (314.0)																					
Matrix:	Water/Soil			W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S
A	280-2216-9	05/27/10	06/18/10	-	-	-	-	0	1	-	-	-	-	-	-	-	-	-	-																				
B	280-2301-8	05/27/10	06/18/10	-	-	-	-	0	2	-	-	-	-	-	-	-	-	-	-																				
C	280-2400-2	05/27/10	06/18/10	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0																				
D	280-2400-9	05/27/10	06/18/10	-	-	-	-	0	3	-	-	-	-	0	1	-	-	-	-																				
E	280-2448-13	05/27/10	06/18/10	-	-	-	-	0	2	-	-	-	-	-	-	-	-	0	1																				
F	280-2771-1	05/27/10	06/18/10	-	-	0	10	0	6	0	4	0	2	0	6	-	-	0	2																				
F	280-2771-1	05/27/10	06/18/10	-	-	0	1	0	1	0	0	0	1	0	1	-	-	0	1																				
G	280-2836-1	05/27/10	06/18/10	-	-	0	6	0	5	-	-	0	3	0	3	-	-	0	5																				
H	280-2879-1	05/27/10	06/18/10	-	-	0	4	0	2	-	-	-	-	-	-	-	-	0	2																				
H	280-2879-1	05/27/10	06/18/10	-	-	0	1	0	2	-	-	-	-	-	-	-	-	0	2																				
I	280-2931-2	05/27/10	06/18/10	0	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-																				
J	280-2960-1	05/27/10	06/18/10	-	-	-	-	0	10	-	-	-	-	-	-	-	-	0	6																				
K	280-2995-4	05/27/10	06/18/10	0	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-																				
K	280-2995-4	05/27/10	06/18/10	0	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-																				
L	280-3059-1	05/27/10	06/18/10	0	4	-	-	0	4	-	-	-	-	-	-	-	-	-	-																				
L	280-3059-1	05/27/10	06/18/10	0	1	-	-	0	1	-	-	-	-	-	-	-	-	-	-																				
Total	T/LR			2	8	2	22	2	39	2	4	2	6	2	11	2	0	2	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	125

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

Tronox LLC Facility, PCS, Henderson, Nevada
Data Validation Reports
LDC #23252

Semivolatiles

LDC

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 13, 2010

LDC Report Date: June 4, 2010

Matrix: Water

Parameters: Semivolatiles

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2400-2

Sample Identification

FB-04132010-RIG2-RZE
EB-04132010-RIG3-RZD

Introduction

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

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

In the case where the laboratory used a calibration curve to evaluate the compounds, all coefficients of determination (r^2) were greater than or equal to 0.990 .

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

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

V. Blanks

Method blanks were reviewed for each matrix as applicable. No semivolatile contaminants were found in the method blanks with the following exceptions:

Method Blank ID	Extraction Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
MB280-11305/1-A	4/16/10	Di-n-octylphthalate	1.65 ug/L	All samples in SDG 280-2400-2

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	Compound TIC (RT in minutes)	Reported Concentration	Modified Final Concentration
FB-04132010-RIG2-RZE	Di-n-octylphthalate	1.6 ug/L	1.6U ug/L
EB-04132010-RIG3-RZD	Di-n-octylphthalate	1.6 ug/L	1.6U ug/L

Sample EB-04132010-RIG3-RZD was identified as an equipment blank. No semivolatile contaminants were found in this blank with the following exceptions:

Equipment Blank ID	Sampling Date	Compound	Concentration	Associated Samples
EB-04132010-RIG3-RZD	4/13/10	Di-n-octylphthalate	1.6 ug/L	No associated samples in this SDG

Sample FB-04132010-RIG2-RZE was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB-04132010-RIG2-RZE	4/13/10	Bis(2-ethylhexyl)phthalate Di-n-octylphthalate	1.1 ug/L 1.6 ug/L	No associated samples in this SDG

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2400-2	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment

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

XVI. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG 280-2400-2

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2400-2	FB-04132010-RIG2-RZE EB-04132010-RIG3-RZD	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG 280-2400-2

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P	Code
280-2400-2	FB-04132010-RIG2-RZE	Di-n-octylphthalate	1.6U ug/L	A	bl
280-2400-2	EB-04132010-RIG3-RZD	Di-n-octylphthalate	1.6U ug/L	A	bl

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Equipment Blank Data Qualification Summary - SDG 280-2400-2

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Field Blank Data Qualification Summary - SDG 280-2400-2

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252C2a
SDG #: 280-2400-2
Laboratory: Test America

Date: 6/12/10
Page: 1 of 1
Reviewer: JV6
2nd Reviewer:

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/13/10
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	2 RSD r
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 25%
V.	Blanks	SW	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	N	Client Spec
VIII.	Laboratory control samples	A	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	N	
XVII.	Field blanks	SW	FB = 1 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	FB-04132010-RIG2-RZE	11	MB 280-11305/1-A	21		31	
2	EB-04132010-RIG3-RZD	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	

VALIDATION FINDINGS WORKSHEET

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

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

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

COMPNDL

LDC #: 23252 C 2a
SDG #: Sw Conv

VALIDATION FINDINGS WORKSHEET
Blanks

Page: 1 of 1
Reviewer: ONE
2nd Reviewer:

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

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

Y N N/A Was a method blank analyzed for each matrix?
Y N N/A Was a method blank analyzed for each concentration preparation level?
Y N N/A Was a method blank associated with every sample?
Y N N/A Was the blank contaminated? If yes, please see qualification below.

Blank extraction date: 4/16/10 **Blank analysis date:** 4/20/10
Conc. units: ug/L Associated Samples: All (6 L)

Compound	Blank ID	Sample Identification								
	MB 280-11305/4-A		1	2						
FFF	1.65		1.6 U	1.6 U						

Blank extraction date: _____ **Blank analysis date:** _____
Conc. units: _____ Associated Samples: _____

Compound	Blank ID	Sample Identification								

5x Phthalates
2x all others

LDC #: 23252C2c
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: MB
2nd Reviewer: [signature]

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

(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: ug/L **Associated sample units:** NA
Sampling date: 4/13/10
Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: None

Compound	FB Blank ID	EB Blk ID	Sample Identification							
	1	2								
EEE	1.1									
FFF	1.6	1.6								
CRQL										

Blank units: _____ **Associated sample units:** _____
Sampling date: _____
Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: _____

Compound	Blank ID	Sample Identification								
CRQL										

5x Phthalates
2x All others

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 27, 2010

LDC Report Date: June 4, 2010

Matrix: Soil

Parameters: Semivolatiles

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2931-2

Sample Identification

SSAK3-05-1BPC

Introduction

This data review covers one soil sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

In the case where the laboratory used a calibration curve to evaluate the compounds, all coefficients of determination (r^2) were greater than or equal to 0.990 .

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

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

V. Blanks

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

Sample FB-04072010-RZD (from SDG 280-2216-2) was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB-04072010-RZD	4/7/10	Bis(2-ethylhexyl)phthalate	2.2 ug/L	All samples in SDG 280-2931-2

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

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

All target compound identifications were within validation criteria.

XII. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2931-2	All compounds reported below the PQL.	J (all detects)	A

XIII. Tentatively Identified Compounds (TICs)

Tentatively identified compounds were not reported by the laboratory.

XIV. System Performance

The system performance was acceptable.

XV. Overall Assessment

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

XVI. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG 280-2931-2

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2931-2	SSAK3-05-1BPC	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG 280-2931-2

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Field Blank Data Qualification Summary - SDG 280-2931-2

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage ~~2B~~ 4

LDC #: 23252I2a
SDG #: 280-2931-2
Laboratory: Test America

Date: 6/6/10
Page: 1 of 1
Reviewer: JVG
2nd Reviewer:

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/27/10
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	2 RSD rr
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 25 %
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	N	client spec
VIII.	Laboratory control samples	A	LCS
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	N	
XVII.	Field blanks	SW	~~RZ~~ FB = FB-040720 10-RZD (280-2216-2)

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: Soil

1	SSAK3-05-1BPC	11		21		31	
2	MB 280-13357/1-A	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	

LDC #: 23252 Ina
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Page: 1 of 2
Reviewer: JV6
2nd Reviewer: [illegible]

Method: Semivolatiles (EPA SW 846 Method 8270C)

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

LDC #: 73257 Tr6
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JG
2nd Reviewer: Q

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

VALIDATION FINDINGS WORKSHEET

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

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

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

LDC #: 73252 Ina
SDG #: Sa Cmv

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: MK
2nd Reviewer: A

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

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: ug/L **Associated sample units:** ug/kg
Sampling date: 4/07/10
Field blank type: (circle one) Field Blank / Rinsate / Other: Associated Samples: All

Compound	Blank ID	Sample Identification								
	FB-040720 10-RZD									
EFE	2.Y		(75x FB)							
CRQL										

Blank units: _____ **Associated sample units:** _____
Sampling date: _____
Field blank type: (circle one) Field Blank / Rinsate / Other: Associated Samples:

Compound	Blank ID	Sample Identification								
CRQL										

5x Phthalates
2x All others

LDC #: 32723
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVB
2nd Reviewer: [illegible]

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

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

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

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

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

#	Standard ID	Calibration Date	Compound (Internal Standard)	Reported RRF (50 std)	Recalculated RRF (50 std)	Reported Average RRF (Initial)	Recalculated Average RRF (Initial)	Reported %RSD	Recalculated %RSD
1	ICAL	4/20/2010	1,4-Dioxane (IS1)	0.6731	0.6731	0.6818	0.6818	5.4	5.44
	MSS D		Naphthalene (IS2)	1.1079	1.1079	1.1204	1.1204	4.7	4.70
			Fluorene (IS3)	1.3779	1.3779	1.3629	1.3629	8.9	8.89
			Hexachlorobenzene (IS4)	0.2590	0.2590	0.2705	0.2705	14.0	13.97
			Chrysene (IS5)	1.0611	1.0611	1.0324	1.0324	4.3	4.35
			Benzo(a)pyrene (IS6)	1.1960	1.1960	1.1835	1.1835	13.5	13.49

)nc IS/Cpd	Area cpd	Area IS
40/50	220464	262046
40/50	1381644	997667
40/50	1155733	671030
40/50	394826	1219394
40/50	2008107	1513952
40/50	1958223	1309806

Conc	1,4-Dioxane	Naphthalene	Fluorene	Hexachlorob	Chrysene	Benzo(a)py
4.00	0.6984	1.0908	1.2935		1.0330	0.9394
10.00	0.7499	1.0730	1.1667	0.2303	0.9982	1.0100
20.00	0.6512	1.0585	1.2453	0.2289	1.0104	1.0839
50.00	**0.6731**	**1.1079**	**1.3779**	**0.2590**	**1.0611**	**1.1960**
80.00	0.6228	1.1000	1.3843	0.2562	1.0602	1.2099
120.00	0.6766	1.1473	1.4242	0.2854	1.0752	1.3098
160.00	0.6887	1.1741	1.4888	0.3029	1.0741	1.3626
200.00	0.6937	1.2114	1.5224	0.3306	0.9470	1.3565
X =	0.6818	1.1204	1.3629	0.2705	1.0324	1.1835
S =	0.0371	0.0527	0.1212	0.0378	0.0449	0.1597

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

LDC # 73252 I2a
SDG # See Cover

VALIDATION FINDINGS WORSHEET
Continuing Calibration Results Verification

Reviewer: JM
2nd Reviewer: R

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

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

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

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

#	Standard ID	Calibration Date	Compound (Reference IS)		Average RRF (Initial RRF)	Reported (CC RRF)	Recalculated (CC RRF)	Reported %D	Recalculated %D
1	D4531	05/01/10	1,4-Dioxane	(IS1)	0.6818	0.6135	0.6135	10.0	10.0
			Naphthalene	(IS2)	1.1204	1.1479	1.1479	2.5	2.5
			Fluorene	(IS3)	1.3629	1.4115	1.4115	3.6	3.6
			Hexachlorobenzene	(IS4)	0.2705	0.2804	0.2804	3.7	3.7
			Chrysene	(IS5)	1.0324	1.0668	1.0668	3.3	3.3
			Benzo(a)pyrene	(IS6)	1.1835	1.2509	1.2509	5.7	5.7

Compound (Reference IS)		Concentration (IS/Cpd)	Area Cpd	Area IS
1,4-Dioxane	(IS1)	40/80	384024	312973
Naphthalene	(IS2)	40/80	2646759	1152826
Fluorene	(IS3)	40/80	2305108	816564
Hexachlorobenzene	(IS4)	40/80	809868	1444254
Chrysene	(IS5)	40/80	3940883	1847115
Benzo(a)pyrene	(IS6)	40/80	3862774	1543947

LDC #: 43252 I2a
SDG #: Sre Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Reviewer: JV6
2nd reviewer: 9

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

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

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: #1

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Nitrobenzene-d5	100	81.2	81	81	0
2-Fluorobiphenyl	↓	77.1	77	77	
Terphenyl-d14	↓	98.9	99	99	
Phenol-d5	150	129.0	86	86	
2-Fluorophenol	↓	119.7	80	80	
2,4,6-Tribromophenol	↓	106.9	71	71	↓
2-Chlorophenol-d4					
1,2-Dichlorobenzene-d4					

Sample ID: _____

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

Sample ID: _____

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

LDC #: 23252 I2a
SDG #: See Cover

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

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

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

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

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

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

LCS/LCSD samples: LCS 280 - 13357/2-A

Compound	Spike Added (ug/kg)		Spike Concentration (ug/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc	Reported	Recalc	Reported	Recalculated
Phenol										
N-Nitroso-di-n-propylamine										
4-Chloro-3-methylphenol										
Acenaphthene	2560	NA	2140	NA	84	84				
Pentachlorophenol										
Pyrene	2560		2530		99	99				

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

LDC #: 73252 I2G
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

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

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

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

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

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

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

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

V_i = Volume of extract injected in microliters (ul)

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

Df = Dilution Factor.

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

2.0 = Factor of 2 to account for GPC cleanup

Example:

Sample I.D. #1, SS

Conc. = $\frac{(80668)(40)(1ml)(1000)(\quad)}{(1312471)(0.2705)(31.4g)(0.952)(\quad)}$

= 304.0

≈ 300 ng/kg

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

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 28, 2010

LDC Report Date: June 4, 2010

Matrix: Soil

Parameters: Semivolatiles

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2995-4

Sample Identification

SSAN6-07-3BPC
SSAN6-07-4BPC**

**Indicates sample underwent Stage 4 review

Introduction

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

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

In the case where the laboratory used a calibration curve to evaluate the compounds, all coefficients of determination (r^2) were greater than or equal to 0.990 .

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

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

V. Blanks

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

Sample FB-04072010-RZC (from SDG 280-2280-2) was identified as a field blank. No semivolatile contaminants were found in this blank.

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

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

XII. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria for samples on which a Stage 4 review was performed.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2995-4	All compounds reported below the PQL.	J (all detects)	A

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

XIII. Tentatively Identified Compounds (TICs)

Tentatively identified compounds were not reported by the laboratory.

XIV. System Performance

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

XV. Overall Assessment

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

XVI. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG 280-2995-4

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2995-4	SSAN6-07-3BPC SSAN6-07-4BPC**	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG 280-2995-4

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Equipment Blank Data Qualification Summary - SDG 280-2995-4

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Field Blank Data Qualification Summary - SDG 280-2995-4

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B/4

LDC #: 23252K2a
SDG #: 280-2995-4
Laboratory: Test America

Date: 6/6 2/10
Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [signature]

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/28/10
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	2 RSD 15%
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 25%
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	A	~~Client spike~~ SSAQ3-01-7BPC
VIII.	Laboratory control samples	A	LCS
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	~~N~~ A	
XII.	Compound quantitation/CRQLs	~~N~~ A	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	~~N~~ A	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	N	
XVII.	Field blanks	ND	FB = FB-04072010-RZC (280-2280-2)

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:
** Level IV Soil

1	SSAN6-07-3BPC	11		21		31	
2	SSAN6-07-4BPC **	12		22		32	
3	MB 280-13949/21-A	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	

LDC #: 23257K2a
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVG
2nd Reviewer:

Method: Semivolatiles (EPA SW 846 Method 8270C)

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

LDC #: 23257k2a
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JV
2nd Reviewer:

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

VALIDATION FINDINGS WORKSHEET

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

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

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

COMPNDL

LDC #: 73252k2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: [signature]

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

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

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

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

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

#	Standard ID	Calibration Date	Compound (Internal Standard)		Reported RRF (50 std)	Recalculated RRF (50 std)	Reported Average RRF (Initial)	Recalculated Average RRF (Initial)	Reported %RSD	Recalculated %RSD
1	ICAL	5/4/2010	1,4-Dioxane	(IS1)	0.6700	0.6700	0.6718	0.6718	4.8	4.84
	MSS Y		Naphthalene	(IS2)	1.0419	1.0419	0.9990	0.9990	8.0	8.04
			Fluorene	(IS3)	1.3468	1.3468	1.3058	1.3058	8.0	8.02
			Hexachlorobenzene	(IS4)	0.1996	0.1996	0.1947	0.1946	2.8	2.82
			Chrysene	(IS5)	1.0651	1.0651	1.0509	1.0509	7.9	7.92
			Benzo(a)pyrene	(IS6)	1.1462	1.1462	1.1042	1.1042	3.3	3.28

Conc IS/Cpd	Area cpd	Area IS
40/50	290884	347342
40/50	1775212	1363095
40/50	1313767	780352
40/50	335135	1343097
40/50	1866391	1401828
40/50	1809781	1263104

Conc	1,4-Dioxane	Naphthalene	Fluorene	Hexachlorob	Chrysene	Benzo(a)py
4.00		1.1191	1.4337		1.1603	1.0624
10.00	0.7200	1.0315	1.4006	0.1914	1.1208	1.0548
20.00	0.7128	1.0652	1.3863	0.1995	1.1246	1.1138
50.00	**0.6700**	**1.0419**	**1.3468**	**0.1996**	**1.0651**	**1.1462**
80.00	0.6540	0.9915	1.2886	0.2021	1.0538	1.1452
120.00	0.6579	0.9413	1.2601	0.1897	0.9907	1.1311
160.00	0.6321	0.9206	1.1894	0.1905	0.9596	1.1027
200.00	0.6558	0.8811	1.1406	0.1897	0.9324	1.0775
X =	0.6718	0.9990	1.3058	0.1946	1.0509	1.1042
S =	0.0325	0.0803	0.1047	0.0055	0.0832	0.0362

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

LDC # 03252k29
SDG # See Cover

VALIDATION FINDINGS WORSHEET
Continuing Calibration Results Verification

Reviewer: JVC
2nd Reviewer: 9

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

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

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

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

#	Standard ID	Calibration Date	Compound (Reference IS)	Average RRF (Initial RRF)	Reported (CC RRF)	Recalculated (CC RRF)	Reported %D	Recalculated %D
1	Y2041	05/05/10	1,4-Dioxane (IS1)	0.6718	0.6326	0.6326	5.8	5.8
			Naphthalene (IS2)	0.9990	0.9901	0.9901	0.9	0.9
			Fluorene (IS3)	1.3058	1.2805	1.2805	1.9	1.9
			Hexachlorobenzene (IS4)	0.1947	0.1995	0.1995	2.5	2.5
			Chrysene (IS5)	1.0509	1.0427	1.0427	0.8	0.8
			Benzo(a)pyrene (IS6)	1.1042	1.1500	1.1500	4.1	4.1

Compound (Reference IS)	Concentration (IS/Cpd)	Area Cpd	Area IS
1,4-Dioxane (IS1)	40/80	529970	418891
Naphthalene (IS2)	40/80	3249540	1640967
Fluorene (IS3)	40/80	2525517	986110
Hexachlorobenzene (IS4)	40/80	667483	1672491
Chrysene (IS5)	40/80	3658447	1754242
Benzo(a)pyrene (IS6)	40/80	3746932	1629142

LDC #: 23257k2c
SDG #: Sre Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

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

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

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

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: # ✓

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Nitrobenzene-d5	100	67.0	67	67	0
2-Fluorobiphenyl	↓	69.2	69	69	↓
Terphenyl-d14	↓	83.5	83	83	↓
Phenol-d5	150	109.7	73	73	↓
2-Fluorophenol	↓	104.1	69	69	↓
2,4,6-Tribromophenol	↓	126.3	84	84	↓
2-Chlorophenol-d4					
1,2-Dichlorobenzene-d4					

Sample ID: _____

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

Sample ID: _____

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

LDC #: 23257k2a
SDG #: See Cover

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

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

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

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

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

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

LCS/LCSD samples: LCS 280-139449/22-A

Compound	Spike Added (ug/kg)		Spike Concentration (ug/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc	Reported	Recalc	Reported	Recalculated
Phenol										
N-Nitroso-di-n-propylamine										
4-Chloro-3-methylphenol										
Acenaphthene	2530	NA	1770	NA	70	70				
Pentachlorophenol										
Pyrene	2530	"	1870	"	74	74				

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

LDC #: 23252k2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

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

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

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

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

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

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

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

V_i = Volume of extract injected in microliters (ul)

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

Df = Dilution Factor.

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

2.0 = Factor of 2 to account for GPC cleanup

Example:

Sample I.D. #✓, SS:

Conc. = $\frac{(85337)(40)(1ml)(1000)(\quad)}{(134837)(0.1947)(30.3g)(0.924)(\quad)}$

= 465.6

≃ 470 ug/kg

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

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 29, 2010

LDC Report Date: June 4, 2010

Matrix: Soil

Parameters: Semivolatiles

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-3059-1

Sample Identification

SSAQ3-01-1BPC
SSAQ3-01-3BPC
SSAQ3-01-5BPC
SSAQ3-01-7BPC
SSAQ3-01-9BPC**
SSAQ3-01-7BPCMS
SSAQ3-01-7BPCMSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 7 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

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

In the case where the laboratory used a calibration curve to evaluate the compounds, all coefficients of determination (r^2) were greater than or equal to 0.990 .

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

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

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

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

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

V. Blanks

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

Sample FB-04062010-RZB (from SDG 280-2131-2) was identified as a field blank. No semivolatile contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB-04062010-RZB	4/6/10	Bis(2-ethylhexyl)phthalate	2.7 ug/L	All samples in SDG 280-3059-1

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

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

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

XII. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria for samples on which a Stage 4 review was performed.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-3059-1	All compounds reported below the PQL.	J (all detects)	A

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

XIII. Tentatively Identified Compounds (TICs)

Tentatively identified compounds were not reported by the laboratory.

XIV. System Performance

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

XV. Overall Assessment

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

XVI. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Data Qualification Summary - SDG 280-3059-1

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-3059-1	SSAQ3-01-1BPC SSAQ3-01-3BPC SSAQ3-01-5BPC SSAQ3-01-7BPC SSAQ3-01-9BPC**	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG 280-3059-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Equipment Blank Data Qualification Summary - SDG 280-3059-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Field Blank Data Qualification Summary - SDG 280-3059-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B/4

LDC #: 23252L2a
SDG #: 280-3059-1
Laboratory: Test America

Date: 6/02/10
Page: 1 of 1
Reviewer: JV6
2nd Reviewer: 9

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/29/10
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	2 RSD r²
IV.	Continuing calibration/ICV	A	CCV/ICV ≤25%
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	A	
VIII.	Laboratory control samples	A	LCS
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	N	
XVII.	Field blanks	SW	FB = FB040620 10-RZB (from 280-2131-2)

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:
** Level 4 Soil

1	SSAQ3-01-1BPC	11	MB 280-13949/1-A	21		31	
2	SSAQ3-01-3BPC	12		22		32	
3	SSAQ3-01-5BPC	13		23		33	
4	SSAQ3-01-7BPC	14		24		34	
5	SSAQ3-01-9BPC **	15		25		35	
6	SSAQ3-01-7BPCMS	16		26		36	
7	SSAQ3-01-7BPCMSD	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

LDC #: 23252L2a
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JW
2nd Reviewer: [illegible]

Method: Semivolatiles (EPA SW 846 Method 8270C)

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

LDC #: 23252L29
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JV
2nd Reviewer: [illegible]

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

VALIDATION FINDINGS WORKSHEET

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

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

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

LDC #: 23257L2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: MG
2nd Reviewer: [illegible]

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

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: ug/L **Associated sample units:** ug/kg
Sampling date: 4/6/10
Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: All

Compound	Blank ID	Sample Identification								
	FB040620 10-RZB									
EEE	2.7		(ND or > 5X FB)							
CRQL										

Blank units: _____ **Associated sample units:** _____
Sampling date: _____
Field blank type: (circle one) Field Blank / Rinsate / Other: _____ Associated Samples: _____

Compound	Blank ID	Sample Identification								
CRQL										

5x Phthalates
2x All others

LDC #: 23252 L2q
SDG #: Lu Cmy

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: MG
2nd Reviewer: R

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

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

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

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

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

#	Standard ID	Calibration Date	Compound (Internal Standard)		Reported RRF (50 std)	Recalculated RRF (50 std)	Reported Average RRF (Initial)	Recalculated Average RRF (Initial)	Reported %RSD	Recalculated %RSD
1	ICAL	5/4/2010	1,4-Dioxane	(IS1)	0.6700	0.6700	0.6718	0.6718	4.8	4.84
	MSS Y		Naphthalene	(IS2)	1.0419	1.0419	0.9990	0.9990	8.0	8.04
			Fluorene	(IS3)	1.3468	1.3468	1.3058	1.3058	8.0	8.02
			Hexachlorobenzene	(IS4)	0.1996	0.1996	0.1947	0.1946	2.8	2.82
			Chrysene	(IS5)	1.0651	1.0651	1.0509	1.0509	7.9	7.92
			Benzo(a)pyrene	(IS6)	1.1462	1.1462	1.1042	1.1042	3.3	3.28

Conc IS/Cpd	Area cpd	Area IS
40/50	290884	347342
40/50	1775212	1363095
40/50	1313767	780352
40/50	335135	1343097
40/50	1866391	1401828
40/50	1809781	1263104

Conc	1,4-Dioxane	Naphthalene	Fluorene	Hexachlorob	Chrysene	Benzo(a)py
4.00		1.1191	1.4337		1.1603	1.0624
10.00	0.7200	1.0315	1.4006	0.1914	1.1208	1.0548
20.00	0.7128	1.0652	1.3863	0.1995	1.1246	1.1138
50.00	**0.6700**	**1.0419**	**1.3468**	**0.1996**	**1.0651**	**1.1462**
80.00	0.6540	0.9915	1.2886	0.2021	1.0538	1.1452
120.00	0.6579	0.9413	1.2601	0.1897	0.9907	1.1311
160.00	0.6321	0.9206	1.1894	0.1905	0.9596	1.1027
200.00	0.6558	0.8811	1.1406	0.1897	0.9324	1.0775
X =	0.6718	0.9990	1.3058	0.1946	1.0509	1.1042
S =	0.0325	0.0803	0.1047	0.0055	0.0832	0.0362

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

LDC # 23252L29
SDG # See Cover

VALIDATION FINDINGS WORSHEET
Continuing Calibration Results Verification

Reviewer: JVG
2nd Reviewer: [signature]

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

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

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

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

#	Standard ID	Calibration Date	Compound (Reference IS)	Average RRF (Initial RRF)	Reported (CC RRF)	Recalculated (CC RRF)	Reported %D	Recalculated %D
1	Y2041	05/05/10	1,4-Dioxane (IS1)	0.6718	0.6326	0.6326	5.8	5.8
			Naphthalene (IS2)	0.9990	0.9901	0.9901	0.9	0.9
			Fluorene (IS3)	1.3058	1.2805	1.2805	1.9	1.9
			Hexachlorobenzene (IS4)	0.1947	0.1995	0.1995	2.5	2.5
			Chrysene (IS5)	1.0509	1.0427	1.0427	0.8	0.8
			Benzo(a)pyrene (IS6)	1.1042	1.1500	1.1500	4.1	4.1

Compound (Reference IS)	Concentration (IS/Cpd)	Area Cpd	Area IS
1,4-Dioxane (IS1)	40/80	529970	418891
Naphthalene (IS2)	40/80	3249540	1640967
Fluorene (IS3)	40/80	2525517	986110
Hexachlorobenzene (IS4)	40/80	667483	1672491
Chrysene (IS5)	40/80	3658447	1754242
Benzo(a)pyrene (IS6)	40/80	3746932	1629142

LDC #: 23252L2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: JV
2nd Reviewer: [illegible]

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

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

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

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

RPD = I MS - MSD I * 2/(MS + MSD)

MS = Matrix spike percent recovery
MSD = Matrix spike duplicate percent recovery

MS/MSD samples: 6/7

Compound	Spike Added (ug/kg)		Sample Concentration (ug/kg)	Spiked Sample Concentration (ug/kg)		Matrix Spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	------	MS	MSD	Reported	Recalc	Reported	Recalc	Reported	Recalculated
Phenol											
N-Nitroso-di-n-propylamine											
4-Chloro-3-methylphenol											
Acenaphthene	2770	2750	0	2200	2090	79	79	76	76	5	5
Pentachlorophenol											
Pyrene	2770	2750	160	2550	2660	86	86	91	91	4	4

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 #: 73252 L29
SDG #: Sre Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

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

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

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

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: # 5

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Nitrobenzene-d5	100	74.1	74	74	0
2-Fluorobiphenyl		76.5	76	76	
Terphenyl-d14		89.7	90	90	
Phenol-d5	150	113.4	76	76	
2-Fluorophenol		109.6	73	73	
2,4,6-Tribromophenol		132.97	89	89	
2-Chlorophenol-d4					
1,2-Dichlorobenzene-d4					

Sample ID:

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

Sample ID:

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

LDC #: 23252 L2a
SDG #: See Cover

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

Reviewer: JVG
2nd Reviewer: [signature]

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

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

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

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

LCS/LCSD samples: LCS 280 - 13949 / 22-A

Compound	Spike Added (ug/kg)		Spike Concentration (ug/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc	Reported	Recalc	Reported	Recalculated
Phenol										
N-Nitroso-di-n-propylamine										
4-Chloro-3-methylphenol										
Acenaphthene	2530	NA	1770	NA	70	70				
Pentachlorophenol										
Pyrene	2530	"	1870	"	74	74				

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

LDC #: 23257 L2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer: JM
2nd reviewer: C

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

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

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

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

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

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

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

V_i = Volume of extract injected in microliters (ul)

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

Df = Dilution Factor.

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

2.0 = Factor of 2 to account for GPC cleanup

Example:

Sample I.D. #5 , SS :

Conc. = $\frac{(96351)(40)(1ml)(1000)(\quad)}{(1339240)(0.1946)(30.5g)(0.928)(\quad)}$

= 522.5

≈ 520 ug/kg

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

Tronox LLC Facility, PCS, Henderson, Nevada
Data Validation Reports
LDC #23252

Chlorinated Pesticides

LDC

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 13, 2010

LDC Report Date: June 4, 2010

Matrix: Water

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2400-2

Sample Identification

FB-04132010-RIG2-RZE
EB-04132010-RIG3-RZD

Introduction

This data review covers 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8081A for Chlorinated Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section 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. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single compounds were 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 .

IV. Continuing Calibration

Continuing calibration was performed at 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 20.0% for all compounds.

The individual 4,4'-DDT and Endrin breakdowns (%BD) were less than or equal to 15.0%.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No chlorinated pesticide contaminants were found in the method blanks.

Sample EB-04132010-RIG3-RZD was identified as an equipment blank. No chlorinated pesticide contaminants were found in this blank.

Sample FB-04132010-RIG2-RZE was identified as a field blank. No chlorinated pesticide contaminants were found in this blank.

VI. Surrogate Spikes

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

Sample	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
MB280-11682/1-A	Col. 1	Tetrachloro-m-xylene	53 (54-115)	All TCL compounds	J- (all detects) UJ (all non-detects)	P

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Pesticide Cleanup Checks

a. Florisil Cartridge Check

Florisil cleanup was not required and therefore not performed in this SDG.

b. GPC Calibration

GPC cleanup was not required and therefore not performed in this SDG.

XI. Target Compound Identification

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2400-2	All compounds reported below the PQL.	J (all detects)	A

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

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG 280-2400-2

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2400-2	FB-04132010-RIG2-RZE EB-04132010-RIG3-RZD	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG 280-2400-2

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Equipment Blank Data Qualification Summary - SDG 280-2400-2

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG 280-2400-2

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252C3a
SDG #: 280-2400-2
Laboratory: Test America

Date: 6/02/10
Page: 1 of 1
Reviewer: JVL
2nd Reviewer: [signature]

METHOD: GC Chlorinated Pesticides (EPA SW 846 Method 8081A)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/13/10
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	rr
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 20 %
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	N	Client Spec
VIII.	Laboratory control samples	A	LCS/D
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	N	
XV.	Field blanks	ND	FB = 1 EB = 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	FB-04132010-RIG2-RZE	11		21		31	
2	EB-04132010-RIG3-RZD	12		22		32	
3	MB 280-11682/1-A	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	

LDC #: 23252C3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Spikes

Page: 1 of 1
Reviewer: VR
2nd Reviewer:

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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

(Y) N N/A Were surrogates spiked into all samples, standards and blanks?
Y (N) N/A Did all surrogate percent recoveries (%R) meet the QC limits?

#	Date	Sample ID	Column	Surrogate Compound	%R (Limits)	Qualifications
		MB 280-11682/1-A	CH. 1	A	53 (54-115)	J- / UJ / P
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	

Letter Designation	Surrogate Compound	Recovery QC Limits (Soil)	Recovery QC Limits (Water)	Comments
A	Tetrachoro-m-xylene			
B	Decachlorobiphenyl			

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 22, 2010

LDC Report Date: June 4, 2010

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2771-1

Sample Identification

SSAL3-04-1BPC
SSAL3-04-3BPC
SSAL3-04-5BPC
SSAL3-04-7BPC
SSAL3-04-9BPC
SSAM2-01-1BPC**
SSAM2-01-3BPC
SSAM2-01-5BPC
SSAM2-01-7BPC
SSAM2-01-9BPC
SSAM2-01-1BPC_FD
SSAM2-01-5BPCMS
SSAM2-01-5BPCMSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 13 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8081A for Chlorinated Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

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

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

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

The percent relative standard deviations (%RSD) were less than or equal to 20.0% for selected compounds.

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

Retention time windows were evaluated and considered technically acceptable for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples on which a Stage 2B review was performed.

IV. Continuing Calibration

Continuing calibration was performed at 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 20.0% for all compounds.

Retention times (RT) of all compounds in the calibration standards were within QC limits for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples on which a Stage 2B review was performed.

The individual 4,4'-DDT and Endrin breakdowns (%BD) were less than or equal to 15.0%.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No chlorinated pesticide contaminants were found in the method blanks.

Samples FB-04072010-RZD (from SDG 280-2216-2) and FB-04132010-RZE (from SDG 280-2400-2) were identified as field blanks. No chlorinated pesticide contaminants were found in these blanks.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for several samples. Since the samples were diluted out, no data were qualified.

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Pesticide Cleanup Checks

a. Florisil Cartridge Check

Florisil cleanup was not required and therefore not performed in this SDG.

b. GPC Calibration

GPC cleanup was not required and therefore not performed in this SDG.

XI. Target Compound Identification

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

XII. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria for samples on which an Stage 4 review was performed.

The sample results for detected compounds from the two columns were within 40% relative percent difference (RPD) with the following exceptions:

Sample	Compound	RPD	Flag	A or P
SSAM2-01-1BPC**	Methoxychlor	193.3	J (all detects)	A

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2771-1	All compounds reported below the PQL.	J (all detects)	A

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

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

Samples SSAM2-01-1BPC** and SSAM2-01-1BPC_FD were identified as field duplicates. No chlorinated pesticides were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SSAM2-01-1BPC**	SSAM2-01-1BPC_FD				
4,4'-DDE	18000	22000	20 (≤50)	-	-	-
4,4'-DDT	19000	17000	11 (≤50)	-	-	-
Dieldrin	300	390	-	90 (≤1900)	-	-
Hexachlorobenzene	2600	3400	-	800 (≤1900)	-	-
Methoxychlor	1000	3700U	-	2700 (≤3700)	-	-

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG 280-2771-1

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2771-1	SSAM2-01-1BPC**	Methoxychlor	J (all detects)	A	Compound quantitation and CRQLs (RPD) (dc)
280-2771-1	SSAL3-04-1BPC SSAL3-04-3BPC SSAL3-04-5BPC SSAL3-04-7BPC SSAL3-04-9BPC SSAM2-01-1BPC** SSAM2-01-3BPC SSAM2-01-5BPC SSAM2-01-7BPC SSAM2-01-9BPC SSAM2-01-1BPC_FD	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG 280-2771-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG 280-2771-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B/4

LDC #: 23252F3a
SDG #: 280-2771-1
Laboratory: Test America

Date: 6/04/10
Page: 1 of 1
Reviewer: AVG
2nd Reviewer:

METHOD: GC Chlorinated Pesticides (EPA SW 846 Method 8081A)

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: 9/22/10
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	2 RSD r
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 20 %
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	A	LCS
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	~~N~~ N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	~~N~~ A	
XII.	Compound quantitation and reported CRQLs	~~SW~~ SW	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	SW	D = 6, 11
XV.	Field blanks	ND	FB = FB-040720 10-R2D (280-2216-Y) ↓ = FB-041520 10-R2E (280-2900-2)

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:
** level IV Soil

1	SSAL3-04-1BPC	11	SSAM2-01-1BPC_FD D	21	MB 280-12472/1-A	31	
2	SSAL3-04-3BPC	12	SSAM2-01-5BPCMS	22		32	
3	SSAL3-04-5BPC	13	SSAM2-01-5BPCMSD	23		33	
4	SSAL3-04-7BPC	14		24		34	
5	SSAL3-04-9BPC	15		25		35	
6	SSAM2-01-1BPC ** D	16		26		36	
7	SSAM2-01-3BPC	17		27		37	
8	SSAM2-01-5BPC	18		28		38	
9	SSAM2-01-7BPC	19		29		39	
10	SSAM2-01-9BPC #	20		30		40	

LDC #: 73257 F34
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

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

Method: Pesticides/PCBs (EPA SW 846 Method 8081/8082)

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. GC/ECD instrument performance check				
Was the instrument performance found to be acceptable?	✓			
III. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Was a linear fit used for evaluation? If yes, were all percent relative standard deviations (%RSD) ≤ 20%?	✓			
Was a curve fit used for evaluation? If Yes, what was the acceptance criteria used?	✓			
Did the initial calibration meet the curve fit acceptance criteria?	✓			
Were the RT windows properly established?	✓			
Were the required standard concentrations analyzed in the initial calibration?				
IV. Continuing calibration	✓			
What type of continuing calibration calculation was performed? ____%D or ____%R	✓			
Were Evaluation mix standards analyzed prior to the initial calibration and sample analysis?	✓			
Were endrin and 4,4'-DDT breakdowns ≤ 15% for individual breakdown in the Evaluation mix standards?	✓			
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 20% or percent recovieries 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?	✓			
Were extract cleanup blanks analyzed with every batch requiring clean-up?	✓			
Was there contamination in the method blanks or clean-up 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) of one or more surrogates was outside QC limits, was a reanalysis performed to confirm %R?	✓			
If any %R was less than 10 percent, was a reanalysis performed to confirm %R?	✓			
VII. Matrix spike/Matrix spike duplicates				

LDC #: 23257F39
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVG
2nd Reviewer: QA

Validation Area	Yes	No	NA	Findings/Comments
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?			✓	
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, dry weight factors, and clean-up activities 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 #: 23257 F3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Spikes

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

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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

Y N N/A Were surrogates spiked into all samples, standards and blanks?

Y N N/A Did all surrogate percent recoveries (%R) meet the QC limits?

#	Date	Sample ID	Column	Surrogate Compound	%R (Limits)	Qualifications
		1 (20x)	Col. 1	B	196 (63-124)	All qual
					( )	
		5 (10x)		B	214 ( )	
					( )	
		6 (1000x)		B	0 ( )	
				A	328 (59-115)	
					( )	
		7 (200x)		B	0 (63-124)	
				A	1970 (59-115)	
					( )	
		8 (50x)		B	0 ( )	
				A	379 ( )	
					( )	
		9 (50x)		B	0 ( )	
				A	357 ( )	
					( )	
		10 (100x)		B	0 ( )	
				A	1110 ( )	
					( )	
		11 (1000x)		B	0 ( )	
				A	1110	

Letter Designation	Surrogate Compound	Recovery QC Limits (Soil)	Recovery QC Limits (Water)	Comments
A	Tetrachoro-m-xylene			
B	Decachlorobiphenyl			

LDC #: 23252 F3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

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

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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 a 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 the relative percent differences (RPD) within the QC limits?

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		12/13	%R	and %RPD not calculated			8	No qual
		(50X)		due to dilutions		( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
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				( )	( )	( )		

LDC #: 23255 F3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

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

METHOD: / GC __ HPLC

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

Level IV/D Only

Y N N/A Were CRQLs adjusted for sample dilutions, dry weight factors, etc.?
Y N N/A Did the reported results for detected target compounds agree within 10.0% of the recalculated results?
Y N N/A Did the percent difference of detected compounds between two columns./detectors ≤40%?
If no, please see findings bellow.

#	Compound Name	Sample ID	%RPD/%D Between Two Columns/Detectors Limit (≤ 40%)	Qualifications
	P	6	193.3	J detB/A (dc)

Comments: See sample calculation verification worksheet for recalculations

LDC#: 23252G3a
SDG#:See cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: JV
2nd Reviewer:

METHOD: GC Chlorinated Pesticides (EPA SW 846 Method 8081A)

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

Compound Name	Conc (ug/Kg)		RPD (≤50%)	Diff	Diff Limits	Quals (Parent Only)
	6	11				
4,4'-DDE	18000	22000	20			
4,4'-DDT	19000	17000	11			
Dieldrin	300	390		90	≤1900	
Hexachlorobenzene	2600	3400		800	≤1900	
Methoxychlor	1000	3700U		2700	≤3700	

V:\FIELD DUPLICATES\23252F3a.wpd

LDC # 23257F3c
SDG# Su Cmpy

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: _____

METHOD: GC EPA SW 846 Method 8081A

Parameter: 4,4'-DDT

Date	Column	Compound	X Area	Y Conc	X^2	
04/26/2010	CLP1	4,4'-DDT	22286.00	4.00		5571.50
			54850.00	10.00		5485.00
	GCS_P2		139559.00	25.00		5582.36
			294636.00	50.00		5892.72
			443277.00	75.00		5910.36
			597478.00	100.00		5974.78
					Ave RF	5736.12

Regression Output:			Reported	
Constant		0.00000	c =	0.00000
Std Err of Y Est		4961.04943		
R Squared		0.99953	r2 =	0.998900
No. of Observations		6.00000		
Degrees of Freedom		5.00000		
			m1 =	5850.000000
X Coefficient(s)	5928.760416	0.444903		
Std Err of Coef.	36.118827	0.11		

LDC # 23252 F3C
SDG# Lu Cmv

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: _____

METHOD: GC EPA SW 846 Method 8081A

Parameter: Hexachlorobenzene

Date	Column	Compound	X Area	Y Conc	X^2	
04/26/2010	CLP1	Hexachlorobenzene	39031.00	4.00		9757.75
			92016.00	10.00		9201.60
	GCS_P2		218583.00	25.00		8743.32
			438324.00	50.00		8766.48
			653554.00	75.00		8714.05
			861853.00	100.00		8618.53
						Ave RF 8966.96

Regression Output:			Reported	
Constant		0.00000	c =	0.00000
Std Err of Y Est		4707.31355		
R Squared		0.99979	r2 =	0.999900
No. of Observations		6.00000		
Degrees of Freedom		5.00000		
			m1 =	8633
X Coefficient(s)	8674.807007	0.444903		
Std Err of Coef.	34.271508	0.11		

LDC # 23252 F3G
SDG# La Cruz

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JV6
2nd Reviewer: _____

METHOD: GC EPA SW 846 Method 8081A

Parameter: Hexachlorobenzene

Date	Column	Compound	X Area	Y Conc	X^2	
04/26/2010	CLP2	Hexachlorobenzene	58418.00	4.00	16.00	14604.50
			134526.00	10.00	100.00	13452.60
	GCS_P2		312150.00	25.00	625.00	12486.00
			605013.00	50.00	2500.00	12100.26
			879444.00	75.00	5625.00	11725.92
			1132166.00	100.00	10000.00	11321.66
					Ave RF	12615.16

Regression Output:			Reported	
Constant		8023.22168	c =	NR
Std Err of Y Est		2267.04743		
R Squared		0.99998	r2 =	1.000000
No. of Observations		6.00000		
Degrees of Freedom		3.00000		
			a =	NR
X Coefficient(s)	12623.434031	-13.727283	b =	NR
Std Err of Coef.	108.349460	1.04		

LDC # 23257F3c
SDG# See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JG
2nd Reviewer: _____

METHOD: GC EPA SW 846 Method 8081A

Parameter: 4,4'-DDT

Date	Column	Compound	X Area	Y Conc	X^2	
04/26/2010	CLP2	4,4'-DDT	26707.00	4.00	16.00	6676.75
			68045.00	10.00	100.00	6804.50
	GCS_P2		171312.00	25.00	625.00	6852.48
			355511.00	50.00	2500.00	7110.22
			525805.00	75.00	5625.00	7010.73
			705006.00	100.00	10000.00	7050.06
					Ave RF	6917.46

Regression Output:		Reported	
Constant	-2800.24293	c =	NR
Std Err of Y Est	3336.78918		
R Squared	0.99991	r2 =	0.999900
No. of Observations	6.00000		
Degrees of Freedom	3.00000		
		a =	NR
X Coefficient(s)	7098.583493	-0.256471	b = NR
Std Err of Coef.	159.475846	1.53	

LDC #23257F3a
SDG# See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Calculation Verification

Reviewer: MC
2nd Reviewer: ____

METHOD: GC_____HPLC_____

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

Percent difference (%D) = 100 * (N - C)/N

Where: N = Initial Calibration Factor or Nominal Amount
C = Calibration Factor from Continuing Calibration Standard or Calculated Amount

#	Standard ID	Calibration Date	Compound	CCV Conc	Reported Conc	Recalculated Conc	Reported % D	Recalculated %D
1	005F0501	5/1/2010	Hexachlorobenzene CLP1	50	51.20	51.73	2.4	3.5
			4,4'-DDT CLP1	50	46.80	46.54	6.4	6.9
			Hexachlorobenzene CLP2	50	50.40	50.37	0.7	0.7
			4,4'-DDT CLP2	50	51.10	51.13	2.3	2.3
2								

	Compound	Area	a	b	c
CCV1	Hexachlorobenzene CLP1	446566		8633.00	
	4,4'-DDT CLP1	272261		5850.00	
	Hexachlorobenzene CLP2	609080	-13.727283	12623.43	8023.22
	4,4'-DDT CLP2	359488	-0.256471	7098.58	-2800.24293

LDC #: 23252 F 39
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

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

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: #6

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Tetrachloro-m-xylene						
Tetrachloro-m-xylene	Col. 1	0.02	0.06567	328	328	0
Decachlorobiphenyl	↓	↓	0	0	0	↓
Decachlorobiphenyl						

Sample ID:

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Tetrachloro-m-xylene						
Tetrachloro-m-xylene						
Decachlorobiphenyl						
Decachlorobiphenyl						

Sample ID:

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Tetrachloro-m-xylene						
Tetrachloro-m-xylene						
Decachlorobiphenyl						
Decachlorobiphenyl						

Sample ID:

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Tetrachloro-m-xylene						
Tetrachloro-m-xylene						
Decachlorobiphenyl						
Decachlorobiphenyl						

Notes:

LDC #: 23257F3a
SDG #: Ia Cary

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Page: 1 of 1
Reviewer: NB
2nd Reviewer:

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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

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

Where: SSC = Spiked sample concentration
SA = Spike added
SC = Concentration

RPD = I MS - MSD I * 2/(MS + MSD)

MS = Matrix spike percent recovery

MSD = Matrix spike duplicate percent recovery

MS/MSD samples: 12/13

Compound	Spike Added (ug/kg)		Sample Concentration (ug/kg)	Spiked Sample Concentration ( )		Matrix Spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	-	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalculated
gamma-BHC	18.7	18.8	0	28	26	NC	139	NC	138	NC	0
4,4'-DDT	↓	↓	580	575	591	-26	0	57	58	3	3
Aroclor 1260											

Comments: Refer ot 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 #: 23257 F3A

SDG #: See Cover

VALIDATION FINDINGS WORKSHEET

Laboratory Control Sample/Laboratory Control Sample Duplicate Results Verification

Reviewer: JVG

2nd Reviewer: _____

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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

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

RPD = | LCS - LCSD | * 2/(LCS + LCSD)

LCS = Laboratory control sample percent recovery; LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: LCS 280-12472/2-A

Compound	Spike Added (ug/kg)		Spiked Sample Concentration (ug/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
gamma-BHC	16.1	NA	14.0	NA	87	87				
4,4'-DDT	↓	↓	14.6	↓	91	91				
Aroclor 1260										

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 #: 23257 #3c
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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

Example:

Sample I.D. #6 4,4'-DDT

Conc. = $\frac{(300293)(10ml)(100)}{(5850)(30.8g)(0.899)}$

= 18538.9

≈ 19000 ng/kg

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

Note:

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 23, 2010

LDC Report Date: June 4, 2010

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2836-1

Sample Identification

SSAM3-02-1BPC
SSAM3-02-3BPC
SSAM3-02-5BPC
SSAM3-02-7BPC
SSAM3-02-9BPC
SSAM3-02-1BPC_FD
SSAM3-02-7BPCMS
SSAM3-02-7BPCMSD
SSAM3-02-9BPCMS
SSAM3-02-9BPCMSD

Introduction

This data review covers 10 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8081A for Chlorinated Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section 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. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

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

The percent relative standard deviations (%RSD) were less than or equal to 20.0% for selected compounds.

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

IV. Continuing Calibration

Continuing calibration was performed at 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 20.0% for all compounds.

The individual 4,4'-DDT and Endrin breakdowns (%BD) were less than or equal to 15.0%.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No chlorinated pesticide contaminants were found in the method blanks.

Sample FB-04132010-RIG2-RZE (from SDG 280-2400-2) was identified as a field blank. No chlorinated pesticide contaminants were found in this blank.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits. Since the samples were diluted out, no data were qualified.

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Pesticide Cleanup Checks

a. Florisil Cartridge Check

Florisil cleanup was not required and therefore not performed in this SDG.

b. GPC Calibration

GPC cleanup was not required and therefore not performed in this SDG.

XI. Target Compound Identification

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2836-1	All compounds reported below the PQL.	J (all detects)	A

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 SSAM3-02-1BPC and SSAM3-02-1BPC_FD were identified as field duplicates. No chlorinated pesticides were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SSAM3-02-1BPC	SSAM3-02-1BPC_FD				
4,4'-DDE	91000	91000	0 (≤50)	-	-	-
4,4'-DDT	41000	41000	-	0 (≤9500)	-	-
Dieldrin	1700	9500U	-	7800 (≤9500)	-	-
Hexachlorobenzene	16000	17000	-	1000 (≤9500)	-	-
Methoxychlor	5600	9600	-	4000 (≤18000)	-	-

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG 280-2836-1

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2836-1	SSAM3-02-1BPC SSAM3-02-3BPC SSAM3-02-5BPC SSAM3-02-7BPC SSAM3-02-9BPC SSAM3-02-1BPC_FD	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG 280-2836-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG 280-2836-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252G3a
SDG #: 280-2836-1
Laboratory: Test America

Date: 6/04/10
Page: 1 of 1
Reviewer: JVG
2nd Reviewer: [signature]

METHOD: GC Chlorinated Pesticides (EPA SW 846 Method 8081A)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/23/10
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	2 RSD ✓
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 20 %
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	A	LCS
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	SW	D = 1, 6
XV.	Field blanks	ND	FB = FB-04/13 2010-RIG2-R2E (280-2900-2)

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: Soil

1	SSAM3-02-1BPC D	11	MB 280-12762/1-A	21		31	
2	SSAM3-02-3BPC	12		22		32	
3	SSAM3-02-5BPC	13		23		33	
4	SSAM3-02-7BPC	14		24		34	
5	SSAM3-02-9BPC	15		25		35	
6	SSAM3-02-1BPC_FD D	16		26		36	
7	SSAM3-02-7BPCMS	17		27		37	
8	SSAM3-02-7BPCMSD	18		28		38	
9	SSAM3-02-9BPCMS	19		29		39	
10	SSAM3-02-9BPCMSD	20		30		40	

LDC #: 73252 G3q
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Spikes

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

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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

(Y) N N/A Were surrogates spiked into all samples, standards and blanks?
Y (N) N/A Did all surrogate percent recoveries (%R) meet the QC limits?

#	Date	Sample ID	Column	Surrogate Compound	%R (Limits)	Qualifications
		1 (5000x)	Cl. I ~~NS~~	B	0 (63-124)	No qual
				A	8100 (59-115)	
					( )	
		2 (2000x)		B	0 ( )	
				A	12100 ( )	
					( )	
		3 (5000x)		B	0 ( )	
				A	1930 ( )	
					( )	
		4 (500x)		B	0 ( )	
				A	1440 ( )	
					( )	
		5 (1000x)		B	0 ( )	
				A	5640 ( )	
					( )	
		6 (5000x)		B	0 ( )	
			✓	A	7270 (✓)	✓
					( )	
					( )	
					( )	

Letter Designation	Surrogate Compound	Recovery QC Limits (Soil)	Recovery QC Limits (Water)	Comments
A	Tetrachoro-m-xylene			
B	Decachlorobiphenyl			

LDC #: 23252 G3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

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

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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 a 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 the relative percent differences (RPD) within the QC limits?

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		7/8 (500X)		%R and RPD not calculated due to dilutions			4	No qual
		9/10 (1000X)					5	

MSD.3S

LDC#: 23252G3a
SDG#:See cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: MG
2nd Reviewer:

METHOD: GC Chlorinated Pesticides (EPA SW 846 Method 8081A)

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

Compound Name	Conc (ug/Kg)		RPD (≤ 50%)	Diff	Diff Limits	Quals (Parent Only)
	1	6				
4,4'-DDE	91000	91000	0			
4,4'-DDT	41000	41000		0	≤9500	
Dieldrin	1700	9500U		7800	≤9500	
Hexachlorobenzene	16000	17000		1000	≤9500	
Methoxychlor	5600	9600		4000	≤18000	

V:\FIELD DUPLICATES\23252G3a.wpd

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 26, 2010

LDC Report Date: June 4, 2010

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2879-1

Sample Identification

SSAI3-04-1BPC**
SSAI3-04-3BPC
SSAI3-04-5BPC
SSAI3-04-7BPC
SSAI3-04-9BPC
SSAI3-04-1BPCMS
SSAI3-04-1BPCMSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 7 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8081A for Chlorinated Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

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

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

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

The percent relative standard deviations (%RSD) were less than or equal to 20.0% for selected compounds.

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

Retention time windows were evaluated and considered technically acceptable for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples on which a Stage 2B review was performed.

IV. Continuing Calibration

Continuing calibration was performed at 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 20.0% for all compounds.

Retention times (RT) of all compounds in the calibration standards were within QC limits for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples on which a Stage 2B review was performed.

The individual 4,4'-DDT and Endrin breakdowns (%BD) were less than or equal to 15.0%.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No chlorinated pesticide contaminants were found in the method blanks.

Sample FB-04072010-RZD (from SDG 280-2216-2) was identified as a field blank. No chlorinated pesticide contaminants were found in this blank.

VI. Surrogate Spikes

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

Sample	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
SSAI3-04-1BPC**	Col. 1 Col. 2	Decachlorobiphenyl Decachlorobiphenyl	195 (63-124) 196 (63-124)	All TCL compounds	J+ (all detects)	A

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Pesticide Cleanup Checks

a. Florisil Cartridge Check

Florisil cleanup was not required and therefore not performed in this SDG.

b. GPC Calibration

GPC cleanup was not required and therefore not performed in this SDG.

XI. Target Compound Identification

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

XII. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria for samples on which an Stage 4 review was performed.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2879-1	All compounds reported below the PQL.	J (all detects)	A

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

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG 280-2879-1

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2879-1	SSAI3-04-1BPC**	All TCL compounds	J+ (all detects)	A	Surrogate spikes (%R) (s)
280-2879-1	SSAI3-04-1BPC** SSAI3-04-3BPC SSAI3-04-5BPC SSAI3-04-7BPC SSAI3-04-9BPC	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG 280-2879-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG 280-2879-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B /4

LDC #: 23252H3a
SDG #: 280-2879-1
Laboratory: Test America

Date: 6/07/10
Page: 1 of 1
Reviewer: JV6
2nd Reviewer:

METHOD: GC Chlorinated Pesticides (EPA SW 846 Method 8081A)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/26/10
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	2 RSD r²
IV.	Continuing calibration/ICV	A	CCV/ICV ≤20%
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	A	LCS
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	N	
XV.	Field blanks	~~SW~~ ND	FB = FB-04072010-RZD (from 280-2216-2)

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:
** Level IV Soil

1	SSAI3-04-1BPC **	11	MB 280-13039/6-A	21		31	
2	SSAI3-04-3BPC	12		22		32	
3	SSAI3-04-5BPC	13		23		33	
4	SSAI3-04-7BPC	14		24		34	
5	SSAI3-04-9BPC	15		25		35	
6	SSAI3-04-1BPCMS	16		26		36	
7	SSAI3-04-1BPCMSD	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

LDC #: 23257 H3a
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JW
2nd Reviewer: [signature]

Method: Pesticides/PCBs (EPA SW 846 Method 8081/8082)

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. GC/ECD Instrument performance check				
Was the instrument performance found to be acceptable?	✓			
III. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Was a linear fit used for evaluation? If yes, were all percent relative standard deviations (%RSD) ≤ 20%?	✓			
Was a curve fit used for evaluation? If Yes, what was the acceptance criteria used?	✓			
Did the initial calibration meet the curve fit acceptance criteria?	✓			
Were the RT windows properly established?	✓			
Were the required standard concentrations analyzed in the initial calibration?	✓			
IV. Continuing calibration				
What type of continuing calibration calculation was performed? ✓ %D or ____ %R	✓			
Were Evaluation mix standards analyzed prior to the initial calibration and sample analysis?	✓			
Were endrin and 4,4'-DDT breakdowns ≤ 15% for individual breakdown in the Evaluation mix standards?	✓			
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 20% or percent recovieries 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?	✓			
Were extract cleanup blanks analyzed with every batch requiring clean-up?	✓			
Was there contamination in the method blanks or clean-up 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) of one or more surrogates was outside QC limits, was a reanalysis performed to confirm %R?	✓			
If any %R was less than 10 percent, was a reanalysis performed to confirm %R?	✓			
VII. Matrix spike/Matrix spike duplicates				

LDC #: 23252 H34
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVG
2nd Reviewer: [illegible]

Validation Area	Yes	No	NA	Findings/Comments
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?			✓	
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, dry weight factors, and clean-up activities 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.		✓		

VALIDATION FINDINGS WORKSHEET

METHOD: Pesticide/PCBs (EPASW 846 Method 8081/8082)

A. alpha-BHC	I. Dieldrin	Q. Endrin ketone	Y. Aroclor-1242	GG.
B. beta-BHC	J. 4,4'-DDE	R. Endrin aldehyde	Z. Aroclor-1248	HH.
C. delta-BHC	K. Endrin	S. alpha-Chlordane	AA. Aroclor-1254	II.
D. gamma-BHC	L. Endosulfan II	T. gamma-Chlordane	BB. Aroclor-1260	JJ.
E. Heptachlor	M. 4,4'-DDD	U. Toxaphene	CC. DB 608	KK.
F. Aldrin	N. Endosulfan sulfate	V. Aroclor-1016	DD. DB 1701	LL.
G. Heptachlor epoxide	O. 4,4'-DDT	W. Aroclor-1221	EE. Hexachlorobenzene	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF.	NN.

Notes:_____

LDC #: 23257H3a
SDG #: fc Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Spikes

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

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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

Y N N/A Were surrogates spiked into all samples, standards and blanks?
Y N N/A Did all surrogate percent recoveries (%R) meet the QC limits?

#	Date	Sample ID	Column	Surrogate Compound	%R (Limits)	Qualifications
		1 (5x)	Col. 1	B	195 (63-124)	J+ dets / A (5)
			Col. 2	B	196 (")	"
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	

Letter Designation	Surrogate Compound	Recovery QC Limits (Soil)	Recovery QC Limits (Water)	Comments
A	Tetrachoro-m-xylene			
B	Decachlorobiphenyl			

LDC #: 23252 H3a
SDG #: Sa Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: JVG
2nd Reviewer: [illegible]

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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 a 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 the relative percent differences (RPD) within the QC limits?

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		6/7	EE	-15 (50-130)	-215 (50-130)	( )	1	No qual.
				( )	( )	( )		(LCS in)
		(5x)		( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
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				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC # 23252 H3a
SDG# Sw Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JV
2nd Reviewer: R

METHOD: GC EPA SW 846 Method 8081A

Parameter: Hexachlorobenzene

Date	Column	Compound	X Area	Y Conc	X^2	
04/26/2010	CLP1	Hexachlorobenzene	39031.00	4.00		9757.75
			92016.00	10.00		9201.60
	GCS_P2		218583.00	25.00		8743.32
			438324.00	50.00		8766.48
			653554.00	75.00		8714.05
			861853.00	100.00		8618.53
					Ave RF	8966.96

Regression Output:			Reported	
Constant		0.00000	c =	0.00000
Std Err of Y Est		4707.31355		
R Squared		0.99979	r2 =	0.999900
No. of Observations		6.00000		
Degrees of Freedom		5.00000		
			m1 =	8633
X Coefficient(s)	8674.807007	0.444903		
Std Err of Coef.	34.271508	0.11		

LDC # 23325v H39
SDG# Sel Cmev

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: R

METHOD: GC EPA SW 846 Method 8081A

Parameter: 4,4'-DDT

Date	Column	Compound	X Area	Y Conc	X^2	
04/26/2010	CLP2	4,4'-DDT	26707.00	4.00	16.00	6676.75
			68045.00	10.00	100.00	6804.50
	GCS_P2		171312.00	25.00	625.00	6852.48
			355511.00	50.00	2500.00	7110.22
			525805.00	75.00	5625.00	7010.73
			705006.00	100.00	10000.00	7050.06
					Ave RF	6917.46

Regression Output:			Reported	
Constant		-2800.24293	c =	NR
Std Err of Y Est		3336.78918		
R Squared		0.99991	r2 =	0.999900
No. of Observations		6.00000		
Degrees of Freedom		3.00000		
			a =	NR
X Coefficient(s)	7098.583493	-0.256471	b =	NR
Std Err of Coef.	159.475846	1.53		

LDC # 23252 H3a
SDG# Gel Conv

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JV6
2nd Reviewer: [illegible]

METHOD: GC EPA SW 846 Method 8081A

Parameter: Hexachlorobenzene

Date	Column	Compound	X Area	Y Conc	X^2	
04/26/2010	CLP1	Hexachlorobenzene	39031.00	4.00		9757.75
			92016.00	10.00		9201.60
	GCS_P2		218583.00	25.00		8743.32
			438324.00	50.00		8766.48
			653554.00	75.00		8714.05
			861853.00	100.00		8618.53
					Ave RF	8966.96

Regression Output:			Reported	
Constant		0.00000	c =	0.00000
Std Err of Y Est		4707.31355		
R Squared		0.99979	r2 =	0.999900
No. of Observations		6.00000		
Degrees of Freedom		5.00000		
			m1 =	8633
X Coefficient(s)	8674.807007	0.444903		
Std Err of Coef.	34.271508	0.11		

LDC # 23252 H3a
SDG# Sa Cmv

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG
2nd Reviewer: R

METHOD: GC EPA SW 846 Method 8081A

Parameter: Hexachlorobenzene

Date	Column	Compound	X Area	Y Conc	X^2	
04/26/2010	CLP2	Hexachlorobenzene	58418.00	4.00	16.00	14604.50
			134526.00	10.00	100.00	13452.60
	GCS_P2		312150.00	25.00	625.00	12486.00
			605013.00	50.00	2500.00	12100.26
			879444.00	75.00	5625.00	11725.92
			1132166.00	100.00	10000.00	11321.66
					Ave RF	12615.16

Regression Output:			Reported	
Constant		8023.22168	c =	NR
Std Err of Y Est		2267.04743		
R Squared		0.99998	r2 =	1.000000
No. of Observations		6.00000		
Degrees of Freedom		3.00000		
			a =	NR
X Coefficient(s)	12623.434031	-13.727283	b =	NR
Std Err of Coef.	108.349460	1.04		

LDC #23252H36
SDG# See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Calculation 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 percent difference (%D) values were recalculated for the compounds identified below using the following calculation:

Percent difference (%D) = 100 * (N - C)/N

Where: N = Initial Calibration Factor or Nominal Amount
C = Calibration Factor from Continuing Calibration Standard or Calculated Amount

#	Standard ID	Calibration Date	Compound	CCV Conc	Reported Conc	Recalculated Conc	Reported % D	Recalculated %D
1	005F0501	5/8/2010	Hexachlorobenzene CLP1	50	48.80	49.33	2.4	1.3
			4,4'-DDT CLP1	50	50.20	49.89	0.3	0.2
			Hexachlorobenzene CLP2	50	49.40	49.43	1.2	1.1
			4,4'-DDT CLP2	50	52.70	52.71	5.4	5.4
2								

	Compound	Area	a	b	c
CCV1	Hexachlorobenzene CLP1	425898		8633.00	
	4,4'-DDT CLP1	291851		5850.00	
	Hexachlorobenzene CLP2	598465	-13.727283	12623.43	8023.22
	4,4'-DDT CLP2	370673	-0.256471	7098.58	-2800.24293

LDC #: 23257 H34
SDG #: Su Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

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

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: #1

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	
Tetrachloro-m-xylene						
Tetrachloro-m-xylene	CLP1	4.0	3.72345	93	93	0
Decachlorobiphenyl	↓	↓	7.80862	195	195	↓
Decachlorobiphenyl						

Sample ID: ______

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	
Tetrachloro-m-xylene						
Tetrachloro-m-xylene						
Decachlorobiphenyl						
Decachlorobiphenyl						

Sample ID: ______

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	
Tetrachloro-m-xylene						
Tetrachloro-m-xylene						
Decachlorobiphenyl						
Decachlorobiphenyl						

Sample ID: ______

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	
Tetrachloro-m-xylene						
Tetrachloro-m-xylene						
Decachlorobiphenyl						
Decachlorobiphenyl						

Notes: ______

LDC #: 43252H3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET

Laboratory Control Sample/Laboratory Control Sample Duplicate Results Verification

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

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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

Where: SSC = Spiked sample concentration
SA = Spike added
SC = Concentration

RPD = I LCS - LCSD I * 2/(LCS + LCSD)

LCS = Laboratory control sample percent recovery
LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: LCS 280-130399/7-A

Compound	Spike Added (ug/kg)		Spiked Sample Concentration (ug/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
gamma-BHC	16.3	NA	15.7	NA	93	93				
4,4'-DDT	↓	↓	16	↓	98	98				
Aroclor 1260										

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 #: 23252H3A
SDG #: Sulcon

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081/8082)

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

Example:

Sample I.D. # 1 Hexachlorobenzene

$$\text{Conc.} = \frac{(\text{Ex } 3758)(\text{Vt ml})(\text{DF})}{(\text{Ex } 8633)(\text{Wt g})(\%\text{S}/100)}$$

$$= \frac{(54\,3758)(10\text{ ml})(5)}{(8633)(31.8\text{g})(0.925)}$$

$$= 107.06$$

$$\approx 110\ \text{ug/kg}$$

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

Note: _____

Tronox LLC Facility, PCS, Henderson, Nevada
Data Validation Reports
LDC #23252

Metals

LDC

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 7, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Arsenic

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2216-9

Sample Identification

SA137-9BPC

Introduction

This data review covers one soil sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Arsenic.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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 arsenic was found in the initial, continuing and preparation blanks.

Sample FB-04072010-RZC (from SDG 280-2280-2) was identified as a field blank. No arsenic was found in this blank.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. Matrix Spike Analysis

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

VII. Duplicate Sample Analysis

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

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 was not performed for this SDG.

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 280-2216-9	All analytes reported below the PQL.	J (all detects)	A

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

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Data Qualification Summary - SDG 280-2216-9

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2216-9	SA137-9BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Laboratory Blank Data Qualification Summary - SDG 280-2216-9

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Field Blank Data Qualification Summary - SDG 280-2216-9

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252A4
SDG #: 280-2216-9
Laboratory: Test America

Date: 6-3-16
Page: 1 of 1
Reviewer: CR
2nd Reviewer: MH

METHOD: As (EPA SW 846 Method 6020)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/7/10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	N	client specified
VII.	Duplicate Sample Analysis	N	↓
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	N	Not performed
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	N	
XV	Field Blanks	ND	FB= FB[redacted]-040720 10-RZC (280-22280-2)

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: Soil

1	SA137-9BPC	11	PBW	21		31	
2		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, PCS, Henderson, Nevada

Collection Date: April 9, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Arsenic

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2301-8

Sample Identification

SA42-2BPC
SA42-4BPC

Introduction

This data review covers 2 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Arsenic.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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 arsenic was found in the initial, continuing and preparation blanks.

Sample FB-04072010-RZC (from SDG 280-2280-2) was identified as a field blank. No arsenic was found in this blank.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. Matrix Spike Analysis

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

VII. Duplicate Sample Analysis

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

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 was not performed for this SDG.

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 280-2301-8	All analytes reported below the PQL.	J (all detects)	A

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

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Data Qualification Summary - SDG 280-2301-8

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2301-8	SA42-2BPC SA42-4BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Laboratory Blank Data Qualification Summary - SDG 280-2301-8

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Field Blank Data Qualification Summary - SDG 280-2301-8

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252B4
SDG #: 280-2301-8
Laboratory: Test America

Date: 6-3-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: MM

METHOD: As (EPA SW 846 Method 6020)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/9/10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	N	Client specified
VII.	Duplicate Sample Analysis	N	↓
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	N	Not performed
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	N	
XV	Field Blanks	ND	FB = FB040720100 - RZC (280-2280-2)

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:

1	SA42-2BPC	11		21		31	
2	SA42-4BPC	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, PCS, Henderson, Nevada

Collection Date: April 13, 2010

LDC Report Date: June 7, 2010

Matrix: Water

Parameters: Metals

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2400-2

Sample Identification

FB-04132010-RIG2-RZE
EB-04132010-RIG3-RZD

Introduction

This data review covers 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Metals. The metals analyzed were Arsenic, Cobalt, Lead, Magnesium, and Manganese.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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 metal contaminants were found in the initial, continuing and preparation blanks with the following exceptions:

Method Blank ID	Analyte	Maximum Concentration	Associated Samples
ICB/CCB	Cobalt	0.0139 ug/L	All samples in SDG 280-2400-2

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
EB-04132010-RIG3-RZD	Cobalt	0.012 ug/L	1.0U ug/L

Sample EB-04132010-RIG3-RZD was identified as an equipment blank. No metal contaminants were found in this blank with the following exceptions:

Equipment Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
EB-04132010-RIG3-RZD	4/13/10	Cobalt Manganese Magnesium	0.012 ug/L 0.98 ug/L 5.3 ug/L	No associated samples in this SDG

Sample FB-04132010-RIG2-RZE was identified as a field blank. No metal contaminants were found in this blank.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. Matrix Spike Analysis

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

VII. Duplicate Sample Analysis

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

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 analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2400-2	All analytes reported below the PQL.	J (all detects)	A

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

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Metals - Data Qualification Summary - SDG 280-2400-2

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2400-2	FB-04132010-RIG2-RZE EB-04132010-RIG3-RZD	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Metals - Laboratory Blank Data Qualification Summary - SDG 280-2400-2

SDG	Sample	Analyte	Modified Final Concentration	A or P	Code
280-2400-2	EB-04132010-RIG3-RZD	Cobalt	1.0U ug/L	A	bl

Tronox LLC Facility, PCS, Henderson, Nevada
Metals - Equipment Blank Data Qualification Summary - SDG 280-2400-2

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Metals - Field Blank Data Qualification Summary - SDG 280-2400-2

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252C4
SDG #: 280-2400-2
Laboratory: Test America

Date: 6-3-16
Page: 1 of 1
Reviewer: CR
2nd Reviewer: W

METHOD: Metals (EPA SW 846 Method 6020)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/13/10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	SW	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	N	Client specified
VII.	Duplicate Sample Analysis	N	↓
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	N	Not preformed
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	N	
XV	Field Blanks	SW	FB=1, EB=2 (no associated samples)

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	FB-04132010-RIG2-RZE	11	PBW	21		31	
2	EB-04132010-RIG3-RZD	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: _____

LDC #: 23252C4
SDG #: SDG002

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Reviewer: CR
2nd reviewer: [illegible]

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1,2		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, 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, 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, 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, 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, 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, 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, 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		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

LDC #: 23252C4
SDG #: See Cover
METHOD: Trace metals (EPA SW 864 Method 6010B/6020/7000)
Sample Concentration units, unless otherwise noted: ug/L

VALIDATION FINDINGS WORKSHEET
PB/ICB/CCB QUALIFIED SAMPLES
Soil preparation factor applied: NA
Associated Samples: All

Reason Code: bl

Reviewer: CR
2nd Reviewer: [illegible]

Analyte	Maximum PB[a] (mg/Kg)	Maximum PB[a] (ug/L)	Maximum ICB/CCB[a] (ug/L)	Action Limit	2									
Co			0.0139		0.012 / 1.0									

Note : a - The listed analyte concentration is the highest ICB, CCB, or PB detected in the analysis of each element.

LDC #: 23252C4
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: CR
2nd Reviewer:

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

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

Field Blank: (be)

Blank units: ug/L **Associated sample units:** mg/Kg
Sampling date: 4/13/10 Soil factor applied 100x
Field blank type: (circle one) Field Blank / Rinsate / Other: (EB) Associated Samples: No Associated Samples

Analyte	Blank ID	Sample Identification										
	2	Action Level										
Co	0.012											
Mn	0.98											
Mg	5.3											

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".

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 13, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Arsenic & Manganese

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2400-9

Sample Identification

SSAO3-01-2BPC
SA139-4BPC
SSAO8-01-10BPC
SA128-6BPC

Introduction

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

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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 arsenic or manganese was found in the initial, continuing and preparation blanks with the following exceptions:

Method Blank ID	Analyte	Maximum Concentration	Associated Samples
ICB/CCB	Manganese	0.974 ug/L	SSAO8-01-10BPC

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

Samples FB-04072010-RZC (from SDG 280-2280-2) and FB-04132010-RIG2-RZE (from SDG 280-2400-2) were identified as field blanks. No arsenic or manganese was found in these blanks.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. Matrix Spike Analysis

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

VII. Duplicate Sample Analysis

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

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 analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2400-9	All analytes reported below the PQL.	J (all detects)	A

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

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic & Manganese - Data Qualification Summary - SDG 280-2400-9

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2400-9	SSAO3-01-2BPC SA139-4BPC SSAO8-01-10BPC SA128-6BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic & Manganese - Laboratory Blank Data Qualification Summary - SDG 280-2400-9

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic & Manganese - Field Blank Data Qualification Summary - SDG 280-2400-9

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252D4
SDG #: 280-2400-9
Laboratory: Test America

Date: 6-3-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: W

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/13/10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	SW	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	N	Client specified
VII.	Duplicate Sample Analysis	N	↓
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	N	Not performed
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	N	
XV	Field Blanks	ND	FB = FB-04072010-RZC (280-22480-2), FB-04132010-RIG2-RZE (280-24080-2)

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: 30/1

1	SSAO3-01-2BPC	11	PBS	21		31	
2	SA139-4BPC	12		22		32	
3	SSAO8-01-10BPC	13		23		33	
4	SA128-6BPC	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: _____

LDC #: 23252D4
SDG #: SDG002

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Reviewer: CR
2nd reviewer: [illegible]

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1,2,4		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, ___ ___
3		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, 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, 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, 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, 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, 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, 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, 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		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

LDC #: 23252D4
SDG #: See Cover
METHOD: Trace metals (EPA SW 864 Method 6010B/6020/7000)
Sample Concentration units, unless otherwise noted: ug/L

VALIDATION FINDINGS WORKSHEET
PB/ICB/CCB QUALIFIED SAMPLES
Soil preparation factor applied: 100x Reason Code: bl
Associated Samples: 3

Reviewer: AR
2nd Reviewer:

Analyte	Maximum PB[a] (mg/Kg)	Maximum PB[a] (ug/L)	Maximum ICB/CCB[a] (ug/L)	Action Limit	No Qualifiers									
Mn			0.974											

Note : a - The listed analyte concentration is the highest ICB, CCB, or PB detected in the analysis of each element.

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 14, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Arsenic

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2448-13

Sample Identification

SA17-9BPC
SA43-2BPC

Introduction

This data review covers 2 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Arsenic.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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 arsenic was found in the initial, continuing and preparation blanks.

Samples EB-04142010-RIG1-RZC and EB-04142010-RIG2-RZC (both from SDG 280-22448-2) were identified as equipment blanks. No arsenic was found in these blanks.

Samples FB-04072010-RZC (from SDG 280-2280-2) and FB-04132010-RIG2-RZE (from SDG 280-2400-2) were identified as field blanks. No arsenic was found in these blanks.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. Matrix Spike Analysis

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

VII. Duplicate Sample Analysis

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

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 was not performed for this SDG.

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 280-2448-13	All analytes reported below the PQL.	J (all detects)	A

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

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Data Qualification Summary - SDG 280-2448-13

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2448-13	SA17-9BPC SA43-2BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Laboratory Blank Data Qualification Summary - SDG 280-2448-13

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Equipment Blank Data Qualification Summary - SDG 280-2448-13

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Field Blank Data Qualification Summary - SDG 280-2448-13

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252E4
SDG #: 280-2448-13
Laboratory: Test America

Date: 6-3-10
Page: 1 of
Reviewer: CR
2nd Reviewer: [illegible]

METHOD: As (EPA SW 846 Method 6020)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/14/10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A N	Client Specified ↓
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	N	Not preformed
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	N	
XV	Field Blanks	ND	FB=FB-04072010-RZC, FB-04132010-RIG2-RZE (280-22280-2) (280-24180-2) *see below

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	SA17-9BPC	11	PBS	21		31	
2	SA43-2BPC	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: * EB= EB-04142010-RIG1-RZC (280-2448-2)
= EB-04142010-RIG2-RZC ↓

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 22, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Metals

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2771-1

Sample Identification

SSAN7-03-1BPC
SSAN7-03-5BPC
SSAO7-02-1BPC
SSAO7-02-5BPC
SSAM2-01-1BPC**
SSAM2-01-5BPC
SSAM2-01-1BPC_FD
SSAM2-01-5BPCMS
SSAM2-01-5BPCMSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 9 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Metals. The metals analyzed were Arsenic, Cobalt, Lead, and Manganese.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. ICPMS Tune

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

III. Calibration

An initial calibration was performed.

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

IV. Blanks

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

Method Blank ID	Analyte	Maximum Concentration	Associated Samples
ICB/CCB	Cobalt	0.0462 ug/L	SSAN7-03-1BPC SSAN7-03-5BPC SSAO7-02-1BPC SSAO7-02-5BPC

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

Samples FB-04072010-RZC (from SDG 280-2280-2) and FB-04132010-RIG2-RZE (from SDG 280-2400-2) were identified as field blanks. No metal contaminants were found in these blanks with the following exceptions:

Field Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
FB-04072010-RZC	4/8/10	Cobalt	0.016 ug/L	SSAN7-03-1BPC SSAN7-03-5BPC SSAO7-02-1BPC SSAO7-02-5BPC

Sample concentrations were compared to concentrations detected in the field 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 with the following exceptions:

Spike ID (Associated Samples)	Analyte	MS (%R) (Limits)	MSD (%R) (Limits)	RPD (Limits)	Flag	A or P
SSAM2-01-5BPCMS/MSD (SSAM2-01-1BPC** SSAM2-01-5BPC SSAM2-01-1BPC_FD)	Lead	72 (75-125)	173 (75-125)	-	J (all detects) UJ (all non-detects)	A

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

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

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

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

XII. Sample Result Verification and Project Quantitation Limit

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

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2771-1	All analytes reported below the PQL.	J (all detects)	A

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

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

Samples SSAM2-01-1BPC** and SSAM2-01-1BPC_FD were identified as field duplicates. No metal contaminants were detected in any of the samples with the following exceptions:

Compound	Concentration (mg/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SSAM2-01-1BPC**	SSAM2-01-1BPC_FD				
Arsenic	3.2	2.8	-	0.4 (≤0.63)	-	-
Manganese	390	410	5 (≤50)	-	-	-
Lead	270	570	71 (≤50)	-	J (all detects)	A

Tronox LLC Facility, PCS, Henderson, Nevada
Metals - Data Qualification Summary - SDG 280-2771-1

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2771-1	SSAM2-01-1BPC** SSAM2-01-5BPC SSAM2-01-1BPC_FD	Lead	J (all detects) UJ (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R) (m)
280-2771-1	SSAN7-03-1BPC SSAN7-03-5BPC SSAO7-02-1BPC SSAO7-02-5BPC SSAM2-01-1BPC** SSAM2-01-5BPC SSAM2-01-1BPC_FD	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)
280-2771-1	SSAM2-01-1BPC** SSAM2-01-1BPC_FD	Lead	J (all detects)	A	Field duplicates (RPD) (fd)

Tronox LLC Facility, PCS, Henderson, Nevada
Metals - Laboratory Blank Data Qualification Summary - SDG 280-2771-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Metals - Field Blank Data Qualification Summary - SDG 280-2771-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B /4

LDC #: 23252F4
SDG #: 280-2771-1
Laboratory: Test America

Date: 6-3-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: M

METHOD: Metals (EPA SW 846 Method 6020)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/22/10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	SW	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	SW	MS/D
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	A	Not reviewed for 2B
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	SW	(5,7)
XV	Field Blanks	SW	FB= FB-041320 10-RIG2-RZE (280-24 00-2), FB-040720 10-RZC (280-2280-2)

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: Soil ** Level 4

1	SSAN7-03-1BPC	11	PDS	21		31	
2	SSAN7-03-5BPC	12		22		32	
3	SSAO7-02-1BPC	13		23		33	
4	SSAO7-02-5BPC	14		24		34	
5	SSAM2-01-1BPC**	15		25		35	
6	SSAM2-01-5BPC	16		26		36	
7	SSAM2-01-1BPC_FD	17		27		37	
8	SSAM2-01-5BPCMS	18		28		38	
9	SSAM2-01-5BPCMSD	19		29		39	
10		20		30		40	

Notes:

LDC #: 23252F4
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

Reviewer: CR
2nd Reviewer: MC

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

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Calibration				
Were all isotopes in the tuning solution mass resolution within 0.1 amu?	✓			
Were %RSD of isotopes in the tuning solution < 5%?	✓			
Were all instruments calibrated daily, each set-up time?	✓			
Were the proper number of standards used?	✓			
Were all initial and continuing calibration verification %Rs within the 90-110% (80-120% for mercury and 85-115% for cyanide) QC limits?	✓			
Were all initial calibration correlation coefficients > 0.995?	✓			
III. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.	✓			
IV. ICP Interference Check Sample				
Were ICP interference check samples performed daily?	✓			
Were the AB solution percent recoveries (%R) with the 80-120% QC limits?	✓			
IV. Matrix spike/Matrix spike duplicates				
Were a matrix spike (MS) and duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD or MS/DUP. Soil / Water.	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the 75-125 QC limits? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.		✓		
Were the MS/MSD or duplicate relative percent differences (RPD) ≤ 20% for waters and ≤ 35% for soil samples? A control limit of +/- RL(+/-2X RL for soil) was used for samples that were ≤ 5X the RL, including when only one of the duplicate sample values were < 5X the RL.	✓	✓		
V. Laboratory control samples				
Was an LCS anaylzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the 80-120% QC limits for water samples and laboratory established QC limits for soils?	✓			

LDC #: 23252F4
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Reviewer: CR
2nd Reviewer: [illegible]

Validation Area	Yes	No	NA	Findings/Comments
VI. Furnace Atomic Absorption QC				
If MSA was performed, was the correlation coefficients > 0.995?			✓	
Do all applicable analysies have duplicate injections? (Level IV only)			✓	
For sample concentrations > RL, are applicable duplicate injection RSD values < 20%? (Level IV only)			✓	
Were analytical spike recoveries within the 85-115% QC limits?			✓	
VII. ICP Serial Dilution				
Was an ICP serial dilution analyzed if analyte concentrations were > 50X the IDL?	✓			
Were all percent differences (%Ds) < 10%?	✓			
Was there evidence of negative interference? If yes, professional judgement will be used to qualify the data.		✓		
VIII. Internal Standards (ICP-MS SW 846 Method 6020)				
Were all the percent recoveries (%R) within the 30-120% of the intensity of the internal standard in the associated initial calibration?	✓			
If the %Rs were outside the criteria, was a reanalysis performed?	✓			
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
X. Sample Result Verification				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
XI. Overall Assessment of Data				
Overall assessment of data was found to be acceptable.	✓			
XII. Field Duplicates				
Field duplicate pairs were identified in this SDG.	✓			
Target analytes were detected in the field duplicates.	✓			
XIII. Field Blanks				
Field blanks were identified in this SDG.	✓			
Target analytes were detected in the field blanks.	✓			

LDC #: 23252F4
SDG #: SDG002

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Reviewer: CR
2nd reviewer: W

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-4		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, ___ ___
5-7		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, ___ ___
8,9		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, 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, 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, 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, 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, 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, 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		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

LDC #: 23252F4
SDG #: See Cover
METHOD: Trace metals (EPA SW 864 Method 6010B/6020/7000)
Sample Concentration units, unless otherwise noted: mg/Kg

VALIDATION FINDINGS WORKSHEET
PB/ICB/CCB QUALIFIED SAMPLES
Soil preparation factor applied: 100x Reason Code: bl
Associated Samples: 1-4

Analyte	Maximum PB[a] (mg/Kg)	Maximum PB[a] (ug/L)	Maximum ICB/CCB[a] (ug/L)	Action Limit	No Qualifiers									
Co			0.0462											

Note : a - The listed analyte concentration is the highest ICB, CCB, or PB detected in the analysis of each element.

LDC #: 23126O4
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: CR
2nd Reviewer: VA

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

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

Field Blank: (bf)

Blank units: ug/L **Associated sample units:** mg/Kg
Sampling date: 4/8/10 Soil factor applied 100x
Field blank type: (circle one) Field Blank / Rinsate / Other: Associated Samples: 1-4

Analyte	Blank ID	Sample Identification										
	FB-04072010-RZC (SDG#: 280-2280-2)	Action Level										
Co	0.016											

LDC #: 23252F4
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: CR
2nd Reviewer: [illegible]

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

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

Y N N/A Was a matrix spike analyzed for each matrix in this SDG?

Y N N/A Were matrix spike percent recoveries (%R) within the control limits of 75-125? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.

Y N N/A Were all duplicate sample relative percent differences (RPD) ≤ 20% ~~for water samples and ≤35%~~ for soil samples?

LEVEL IV ONLY:

Y N N/A Were recalculated results acceptable? See Level IV Recalculation Worksheet for recalculations.

#	MS/MSD ID	Matrix	Analyte	MS %Recovery	MSD %Recovery	RPD (Limits)	Associated Samples	Qualifications
	8/9	Soil	Pb	72	173		5-7	J/UJ/A (m)
			Pb			27	↓	No Qual (LCS in)
			Mn			42	↓	↓

Comments: _____

LDC#: 23252F4 **VALIDATION FINDINGS WORKSHEET** Page: 1 of 1
SDG#: See Cover **Field Duplicates** Reviewer: CK
2nd Reviewer: [illegible]

METHOD: Metals (EPA Method 6020/7000)

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

Compound	Concentration (mg/Kg) 5	Concentration (mg/Kg) 7	(≤50) RPD	(mg/Kg) Difference	(mg/Kg) Limits	Qualifications (Parent Only)
Arsenic	3.2	2.8		0.4	(≤0.63)	
Manganese	390	410	5			
Lead	270	570	71			Jdet/A (fd)

V:\FIELD DUPLICATES\FD_inorganic\23252F4.wpd

LDC #: 23259F4
SDG #: Seecover

VALIDATION FINDINGS WORKSHEET
Initial and Continuing Calibration Calculation Verification

Reviewer: GR
2nd Reviewer: [illegible]

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

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

%R = Found x 100 / True

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

Standard ID	Type of Analysis	Element	Found (ug/L)	True (ug/L)	Recalculated %R	Reported %R	Acceptable (Y/N)
	ICP (Initial calibration)						
	GFAA (Initial calibration)						
	CVAA (Initial calibration)						
	ICP (Continuing calibration)						
	GFAA (Continuing calibration)						
	CVAA (Continuing calibration)						
ICV	ICP/MS (Initial calibration)	As	41.5	40	104	104	Y
CCV	ICP/MS (Continuing calibation)	Mn	52.1	50	104	104	Y

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

LDC #: 23252F4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

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

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

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

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

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

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

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

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

Sample ID	Type of Analysis	Element	Found / S / I (units) mg/kg	True / D / SDR (units) mg/kg	Recalculated %R / RPD / %D	Reported %R / RPD / %D	Acceptable (Y/N)
ICS AB	ICP interference check	Mn	102 ug/L	100 ug/L	102	102	Y
LCS	Laboratory control sample	Pb	20.3	20.0	102	102	
8	Matrix spike	As	(SSR-SR) 19.5	20.7	94	94	
8/9	Duplicate	Mn	226	346	42	42	
6	ICP serial dilution	Pb	62	64.3	3.7	3.8	

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.

TOTCLC.4SW

LDC #: 23252F4
SDG #: seeaer

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

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

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

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

Detected analyte results for AS were recalculated and verified using the following equation:

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

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

Recalculation:

$$\frac{(100mL)(5)\left(\frac{6.45\mu g/L}{1000}\right)}{(0.899)(1.1g)} = 3.2 mg/kg$$

Sample ID	Analyte	Reported Concentration (mg/kg)	Calculated Concentration (mg/kg)	Acceptable (Y/N)
5	AS	3.2	3.2	Y
	Mn	390	390	↓
	Pb	270	270	↓

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 23, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Metals

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2836-1

Sample Identification

SSAM3-02-1BPC
SSAM3-02-5BPC
SSAJ2-01-1BPC
SSAJ2-01-5BPC
SSAM3-02-1BPC_FD
SSAM3-02-1BPCMS
SSAM3-02-1BPCMSD

Introduction

This data review covers 7 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Metals. The metals analyzed were Arsenic, Lead, and Manganese.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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 metal contaminants were found in the initial, continuing and preparation blanks with the following exceptions:

Method Blank ID	Analyte	Maximum Concentration	Associated Samples
PB (prep blank)	Lead Manganese	0.0442 mg/Kg 0.144 mg/Kg	SSAM3-02-1BPC SSAM3-02-5BPC SSAM3-02-1BPC_FD

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

Samples FB-04072010-RZD (from SDG 280-2216-2) and FB-04132010-RIG2-RZE (from SDG 280-2400-2) were identified as field blanks. No metal contaminants were found in these blanks.

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 analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2836-1	All analytes reported below the PQL.	J (all detects)	A

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 SSAM3-02-1BPC and SSAM3-02-1BPC_FD were identified as field duplicates. No metal contaminants were detected in any of the samples with the following exceptions:

Compound	Concentration (mg/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SSAM3-02-1BPC	SSAM3-02-1BPC_FD				
Arsenic	1.4	2.3	-	0.9 (≤0.68)	J (all detects)	A
Manganese	160	370	79 (≤50)	-	J (all detects)	A
Lead	1300	660	65 (≤50)	-	J (all detects)	A

Tronox LLC Facility, PCS, Henderson, Nevada
Metals - Data Qualification Summary - SDG 280-2836-1

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2836-1	SSAM3-02-1BPC SSAM3-02-5BPC SSAJ2-01-1BPC SSAJ2-01-5BPC SSAM3-02-1BPC_FD	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)
280-2836-1	SSAM3-02-1BPC SSAM3-02-1BPC_FD	Arsenic	J (all detects)	A	Field duplicates (Difference) (fd)
280-2836-1	SSAM3-02-1BPC SSAM3-02-1BPC_FD	Manganese Lead	J (all detects) J (all detects)	A	Field duplicates (RPD) (fd)

Tronox LLC Facility, PCS, Henderson, Nevada
Metals - Laboratory Blank Data Qualification Summary - SDG 280-2836-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Metals - Field Blank Data Qualification Summary - SDG 280-2836-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252G4
SDG #: 280-2836-1
Laboratory: Test America

Date: 6-3-10
Page: 1 of 1
Reviewer: SR
2nd Reviewer: MV

METHOD: Metals (EPA SW 846 Method 6020)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/23/10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	SW	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	MS/D
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	SW	(1,5)
XV	Field Blanks	ND	FB- FB-04132010-RIG2-RZE (280-24100-2), FB-04012010-RZD (280-22216-2)

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: 30.1

1	SSAM3-02-1BPC	11	RBS	21		31	
2	SSAM3-02-5BPC	12		22		32	
3	SSAJ2-01-1BPC	13		23		33	
4	SSAJ2-01-5BPC	14		24		34	
5	SSAM3-02-1BPC_FD	15		25		35	
6	SSAM3-02-1BPCMS	16		26		36	
7	SSAM3-02-1BPCMSD	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 23252G4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Reviewer: CR
2nd reviewer: AV

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1,2,5		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⁻; ___ ___
3,4		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⁻; ___ ___
QC 6,7		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, 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, 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, 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, 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, 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, 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		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

LDC #: 23252G4
SDG #: See Cover
METHOD: Trace metals (EPA SW 864 Method 6010B/6020/7000)
Sample Concentration units, unless otherwise noted: ~~ug/L~~ mg/kg

VALIDATION FINDINGS WORKSHEET
PB/ICB/CCB QUALIFIED SAMPLES
Soil preparation factor applied: 100x Reason Code: bl
Associated Samples: 1, 2, 5

Analyte	Maximum PB[a] (mg/Kg)	Maximum PB[a] (ug/L)	Maximum ICB/CCB[a] (ug/L)	Action Limit	No Qualifiers									
Pb	0.0442													
Mn	0.144													

Note : a - The listed analyte concentration is the highest ICB, CCB, or PB detected in the analysis of each element.

LDC#: 23252G4
SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: CR
2nd Reviewer: [illegible]

METHOD: Metals (EPA Method 6020/7000)

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

Compound	Concentration (mg/Kg) 1	Concentration (mg/Kg) 5	(≤50) RPD	(mg/Kg) Difference	(mg/Kg) Limits	Qualifications (Parent Only)
Arsenic	1.4	2.3		0.9	(≤0.68)	Jdet/A (fd)
Manganese	160	370	79			Jdet/A (fd)
Lead	1300	660	65			Jdet/A (fd)

V:\FIELD DUPLICATES\FD_inorganic\23252G4.wpd

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 26, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Arsenic

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2879-1

Sample Identification

SSAJ2-02-1BPC
SSAJ2-02-5BPC**
SSAR6-04-1BPC
SSAR6-04-5BPC**
SSAJ2-02-1BPCMS
SSAJ2-02-1BPCMSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 6 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Arsenic.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. ICPMS Tune

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

III. Calibration

An initial calibration was performed.

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

IV. Blanks

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

Samples FB-04062010-RZB (from SDG 280-2131-1) and FB-04072010-RZD (from SDG 280-2216-2) were identified as field blanks. No arsenic was found in these blanks.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. Matrix Spike Analysis

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

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

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

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

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

XII. Sample Result Verification and Project Quantitation Limit

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

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2879-1	All analytes reported below the PQL.	J (all detects)	A

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

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Data Qualification Summary - SDG 280-2879-1

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2879-1	SSAJ2-02-1BPC SSAJ2-02-5BPC** SSAR6-04-1BPC SSAR6-04-5BPC**	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Laboratory Blank Data Qualification Summary - SDG 280-2879-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Field Blank Data Qualification Summary - SDG 280-2879-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B /4

LDC #: 23252H4
SDG #: 280-2879-1
Laboratory: Test America

Date: 6-3-10
Page: 1 of 1
Reviewer: ar
2nd Reviewer: lw

METHOD: As (EPA SW 846 Method 6020)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/26/10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	MS/D
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	A*	Not reviewed for 2B
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	N	
XV	Field Blanks	ND	FB = FB04062010-RZB (280-2131-1), FB-04072010-RZD (280-2216-2)

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: soil ** Level 4

1	SSAJ2-02-1BPC	11	PBS	21		31	
2	SSAJ2-02-5BPC **	12		22		32	
3	SSAR6-04-1BPC	13		23		33	
4	SSAR6-04-5BPC **	14		24		34	
5	SSAJ2-02-1BPCMS	15		25		35	
6	SSAJ2-02-1BPCMSD	16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 23252H4
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

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

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

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Calibration				
Were all isotopes in the tuning solution mass resolution within 0.1 amu?	✓			
Were %RSD of isotopes in the tuning solution < 5%?	✓			
Were all instruments calibrated daily, each set-up time?	✓			
Were the proper number of standards used?	✓			
Were all initial and continuing calibration verification %Rs within the 90-110% (80-120% for mercury and 85-115% for cyanide) QC limits?	✓			
Were all initial calibration correlation coefficients ≥ 0.995?	✓			
III. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
IV. ICP Interference Check Sample (ICS)				
Were ICP interference check samples performed daily?	✓			
Were the AB solution percent recoveries (%R) with the 80-120% QC limits?	✓			
V. Matrix spike/Matrix spike duplicates				
Were a matrix spike (MS) and duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD or MS/DUP. Soil / Water.	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the 75-125 QC limits? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.	✓			
Were the MS/MSD or duplicate relative percent differences (RPD) ≤ 20% for waters and ≤ 35% for soil samples? A control limit of +/- RL(+/-2X RL for soil) was used for samples that were ≤ 5X the RL, including when only one of the duplicate sample values were ≤ 5X the RL.	✓			
VI. Laboratory control samples				
Was an LCS anaylzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the 80-120% QC limits for water samples and laboratory established QC limits for soils?	✓			

LDC #: 23252H4
SDG #: Seecover

VALIDATION FINDINGS CHECKLIST

Reviewer: ER
2nd Reviewer: [illegible]

Validation Area	Yes	No	NA	Findings/Comments
VI. Furnace Atomic Absorption QC				
If MSA was performed, was the correlation coefficients > 0.995?			✓	
Do all applicable analysies have duplicate injections? (Level IV only)			✓	
For sample concentrations > RL, are applicable duplicate injection RSD values < 20%? (Level IV only)			✓	
Were analytical spike recoveries within the 85-115% QC limits?			✓	
VII. ICP Serial Dilutions				
Was an ICP serial dilution analyzed if analyte concentrations were > 50X the IDL?	✓			
Were all percent differences (%Ds) < 10%?	✓			
Was there evidence of negative interference? If yes, professional judgement will be used to qualify the data.		✓		
VIII. Internal Standards (EPA SW-846 Method 6020)				
Were all the percent recoveries (%R) within the 30-120% of the intensity of the internal standard in the associated initial calibration?	✓			
If the %Rs were outside the criteria, was a reanalysis performed?	✓			
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
X. Sample Result Verification				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
XI. Overall Assessment of Data				
Overall assessment of data was found to be acceptable.	✓			
XII. Field Duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target analytes were detected in the field duplicates.			✓	
XIII. Field Blanks				
Field blanks were identified in this SDG.	✓			
Target analytes were detected in the field blanks.		✓		

LDC #: 23252H4
SDG #: Seecover

VALIDATION FINDINGS WORKSHEET
Initial and Continuing Calibration Calculation Verification

Reviewer: GR
2nd Reviewer: [illegible]

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

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

%R = Found x 100 / True

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

Standard ID	Type of Analysis	Element	Found (ug/L)	True (ug/L)	Recalculated %R	Reported %R	Acceptable (Y/N)
	ICP (Initial calibration)						
	GFAA (Initial calibration)						
	CVAA (Initial calibration)						
	ICP (Continuing calibration)						
	GFAA (Continuing calibration)						
	CVAA (Continuing calibration)						
ICV	ICP/MS (Initial calibration)	As	40.5	40.0	101	101	Y
CCV	ICP/MS (Continuing calibation)	As	50.3	50.0	101	101	Y

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

LDC #: 23252H4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

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

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

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

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

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

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

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

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

Sample ID	Type of Analysis	Element	Found / S / I (~~units~~) mg/kg	True / D / SDR (~~units~~) mg/kg	Recalculated %R / RPD / %D	Reported %R / RPD / %D	Acceptable (Y/N)
ICSAB	ICP interference check	As	104 ug/L	100 ug/L	104	104	Y
LCS	Laboratory control sample		19.3	20.0	97	97	
5	Matrix spike		(SSR-SR) 19.9	21.2	94	94	
5/6	Duplicate		25.6	24.6	4	4	
1	ICP serial dilution	↓	5.7	5.93	4.0	3.5	↓

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 #: 23252H4
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
Reviewer: CR
2nd reviewer: N/A

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

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

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

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

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

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

Recalculation:

$$\frac{(100mL)(5)\left(\frac{10.03\mu g}{L}\right)}{(0.92)(1.1g)} = 4.9\ mg/kg$$

Sample ID	Analyte	Reported Concentration (mg/kg)	Calculated Concentration (mg/kg)	Acceptable (Y/N)
7	As	4.9	4.9	Y

RECALC.4S2

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 27, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Arsenic

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2960-1

Sample Identification

SSAR7-02-1BPC
SSAR7-02-5BPC
SSAR7-03-1BPC
SSAR7-03-5BPC
SSAR7-04-1BPC
SSAR7-04-5BPC
SSAK8-04-1BPC
SSAK8-04-5BPC
SSAK8-05-1BPC
SSAK8-05-5BPC
SSAR7-02-1BPCMS
SSAR7-02-1BPCMSD

Introduction

This data review covers 12 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Arsenic.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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 arsenic was found in the initial, continuing and preparation blanks.

Samples FB-04062010-RZB (from SDG 280-2131-1) and FB-04072010-RZD (from SDG 280-2216-2) were identified as field blanks. No arsenic was found in these blanks.

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 analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2960-1	All analytes reported below the PQL.	J (all detects)	A

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

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Data Qualification Summary - SDG 280-2960-1

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2960-1	SSAR7-02-1BPC SSAR7-02-5BPC SSAR7-03-1BPC SSAR7-03-5BPC SSAR7-04-1BPC SSAR7-04-5BPC SSAK8-04-1BPC SSAK8-04-5BPC SSAK8-05-1BPC SSAK8-05-5BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Laboratory Blank Data Qualification Summary - SDG 280-2960-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Field Blank Data Qualification Summary - SDG 280-2960-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252J4
SDG #: 280-2960-1
Laboratory: Test America

Date: 6-3-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: [illegible]

METHOD: As (EPA SW 846 Method 6020)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/27/10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	MS/D
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	N	
XV	Field Blanks	ND	FB = FB04062010-RZB (280-2131-1), FB-04072010-RZD (280-2216-2)

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: Soil

1	SSAR7-02-1BPC	11	SSAR7-02-1BPCMS	21	PBS	31	
2	SSAR7-02-5BPC	12	SSAR7-02-1BPCMSD	22		32	
3	SSAR7-03-1BPC	13		23		33	
4	SSAR7-03-5BPC	14		24		34	
5	SSAR7-04-1BPC	15		25		35	
6	SSAR7-04-5BPC	16		26		36	
7	SSAK8-04-1BPC	17		27		37	
8	SSAK8-04-5BPC	18		28		38	
9	SSAK8-05-1BPC	19		29		39	
10	SSAK8-05-5BPC	20		30		40	

Notes: _____

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 29, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Arsenic

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-3059-1

Sample Identification

SSAQ4-04-1BPC
SSAQ4-04-5BPC
SSAO4-05-1BPC**
SSAO4-05-5BPC
SSAO4-05-1BPC_FD
SSAQ4-04-1BPCMS
SSAQ4-04-1BPCMSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 7 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 6020 for Arsenic.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blanks are summarized in Section IV.

Field duplicates are summarized in Section XIV.

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

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. ICPMS Tune

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

III. Calibration

An initial calibration was performed.

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

IV. Blanks

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

Samples FB-04062010-RZB (from SDG 280-2131-1) and FB-04072010-RZC (from SDG 280-2280-2) were identified as field blanks. No arsenic was found in these blanks.

V. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

VI. Matrix Spike Analysis

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

VII. Duplicate Sample Analysis

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

VIII. Laboratory Control Samples (LCS)

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

IX. Internal Standards

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

X. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

XI. ICP Serial Dilution

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

XII. Sample Result Verification and Project Quantitation Limit

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

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-3059-1	All analytes reported below the PQL.	J (all detects)	A

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

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

Samples SSAO4-05-1BPC** and SSAO4-05-1BPC_FD were identified as field duplicates. No arsenic was detected in any of the samples with the following exceptions:

Compound	Concentration (mg/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SSAO4-05-1BPC**	SSAO4-05-1BPC_FD				
Arsenic	4.2	6.2	38 (≤50)	-	-	-

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Data Qualification Summary - SDG 280-3059-1

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-3059-1	SSAQ4-04-1BPC SSAQ4-04-5BPC SSAO4-05-1BPC** SSAO4-05-5BPC SSAO4-05-1BPC_FD	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Laboratory Blank Data Qualification Summary - SDG 280-3059-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Arsenic - Field Blank Data Qualification Summary - SDG 280-3059-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B/4

LDC #: 23252L4
SDG #: 280-3059-1
Laboratory: Test America

Date: 6-3-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: W

METHOD: As (EPA SW 846 Method 6020)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/29/10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	A	MS/D
VII.	Duplicate Sample Analysis	N	
VIII.	Laboratory Control Samples (LCS)	A	LCS
IX.	Internal Standard (ICP-MS)	A	
X.	Furnace Atomic Absorption QC	N	Not utilized
XI.	ICP Serial Dilution	A	
XII.	Sample Result Verification	A	Not reviewed for level ~~4~~ 2B
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	SW	~~(4,5)~~ (3,5)
XV	Field Blanks	ND	FB=FB040620 10-RZB, FB-04072010-RZC (280-21231-1) (280-22280-2)

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

Validated Samples: ** Level 4 Soil

1	SSAQ4-04-1BPC	11	QDS	21		31	
2	SSAQ4-04-5BPC	12		22		32	
3	SSAO4-05-1BPC **	13		23		33	
4	SSAO4-05-5BPC	14		24		34	
5	SSAO4-05-1BPC_FD	15		25		35	
6	SSAQ4-04-1BPCMS	16		26		36	
7	SSAQ4-04-1BPCMSD	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 23252L4
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

Reviewer: CR
2nd Reviewer: LW

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

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Calibration				
Were all isotopes in the tuning solution mass resolution within 0.1 amu?	✓			
Were %RSD of isotopes in the tuning solution < 5%?	✓			
Were all instruments calibrated daily, each set-up time?	✓			
Were the proper number of standards used?	✓			
Were all initial and continuing calibration verification %Rs within the 90-110% (80-120% for mercury and 85-115% for cyanide) QC limits?	✓			
Were all initial calibration correlation coefficients ≥ 0.995?	✓			
III. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
IV. ICP Interference Check Sample				
Were ICP interference check samples performed daily?	✓			
Were the AB solution percent recoveries (%R) with the 80-120% QC limits?	✓			
V. Matrix spike/Matrix spike duplicates				
Were a matrix spike (MS) and duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD or MS/DUP. Soil / Water.	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the 75-125 QC limits? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.	✓			
Were the MS/MSD or duplicate relative percent differences (RPD) ≤ 20% for waters and ≤ 35% for soil samples? A control limit of +/- RL(+/-2X RL for soil) was used for samples that were ≤ 5X the RL, including when only one of the duplicate sample values were < 5X the RL.	✓			
VI. Laboratory control samples				
Was an LCS anaylzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the 80-120% QC limits for water samples and laboratory established QC limits for soils?	✓			

LDC #: 23252L4
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Reviewer: ER
2nd Reviewer: W

Validation Area	Yes	No	NA	Findings/Comments
VI. Furnace Atomic Absorption QC				
If MSA was performed, was the correlation coefficients > 0.995?			✓	
Do all applicable analysies have duplicate injections? (Level IV only)			✓	
For sample concentrations > RL, are applicable duplicate injection RSD values < 20%? (Level IV only)			✓	
Were analytical spike recoveries within the 85-115% QC limits?			✓	
VII. ICP Serial dilution				
Was an ICP serial dilution analyzed if analyte concentrations were > 50X the IDL?	✓			
Were all percent differences (%Ds) < 10%?	✓			
Was there evidence of negative interference? If yes, professional judgement will be used to qualify the data.		✓		
VIII. Internal Standards (ICP-MS) (SW 846 Method 6020)				
Were all the percent recoveries (%R) within the 30-120% of the intensity of the internal standard in the associated initial calibration?	✓			
If the %Rs were outside the criteria, was a reanalysis performed?	✓			
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
X. Sample Result Verification				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
XI. Overall Assessment of Data				
Overall assessment of data was found to be acceptable.	✓			
XII. Field Duplicates				
Field duplicate pairs were identified in this SDG.	✓			
Target analytes were detected in the field duplicates.	✓			
XIII. Field Blanks				
Field blanks were identified in this SDG.	✓			
Target analytes were detected in the field blanks.		✓		

LDC#: 23252L4
SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: CR
2nd Reviewer: [signature]

METHOD: Metals (EPA Method 6020/7000)

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

Compound	Concentration (mg/Kg)		(≤50) RPD	(mg/Kg) Difference	(mg/Kg) Limits	Qualifications (Parent Only)
	~~4~~ 3	5				
Arsenic	~~4.4~~ 4.2	6.2	~~24~~ 38			

V:\FIELD DUPLICATES\FD_inorganic\23252L4.wpd

LDC #: 32524
SDG #: secover

VALIDATION FINDINGS WORKSHEET
Initial and Continuing Calibration Calculation Verification

Reviewer: QR
2nd Reviewer:

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

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

%R = Found x 100 / True

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

Standard ID	Type of Analysis	Element	Found (ug/L)	True (ug/L)	Recalculated %R	Reported %R	Acceptable (Y/N)
	ICP (Initial calibration)						
	GFAA (Initial calibration)						
	CVAA (Initial calibration)						
	ICP (Continuing calibration)						
	GFAA (Continuing calibration)						
	CVAA (Continuing calibration)						
ICV	ICP/MS (Initial calibration)	As	38.4	40.0	96	96	Y
CCV	ICP/MS (Continuing calibation)	As	48.4	50.0	97	97	Y

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

LDC #: 23252L4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

Reviewer: QR
2nd Reviewer: [illegible]

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

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

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

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

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

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

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

Sample ID	Type of Analysis	Element	Found / S / I (units) mg/kg	True / D / SDR (units) mg/kg	Recalculated %R / RPD / %D	Reported %R / RPD / %D	Acceptable (Y/N)
ICSAB	ICP interference check	As	100 ug/L	100 ug/L	100	100	Y
LCS	Laboratory control sample		18.4	20	92	92	
6	Matrix spike		(SSR-SR) 17.3	18.4	94	94	
6/7	Duplicate		22.4	24.1	7	7	
1	ICP serial dilution	↓	5.1	4.94	3.1	3.1	↓

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 #: 23252L4
SDG #: seeaer2

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

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

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

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

Detected analyte results for AS were recalculated and verified using the following equation:

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

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

Recalculation:

$$\frac{(100ml)(5)\left(\frac{0.818ug/L}{1000}\right)}{0.93\ (1.04g)} = 4.2\ mg/kg$$

Sample ID	Analyte	Reported Concentration (mg/kg)	Calculated Concentration (mg/kg)	Acceptable (Y/N)
3	AS	4.2	4.2	Y

RECALC.4S2

Tronox LLC Facility, PCS, Henderson, Nevada
Data Validation Reports
LDC #23252

Perchlorate

LDC

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 13, 2010

LDC Report Date: June 7, 2010

Matrix: Water

Parameters: Perchlorate

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2400-2

Sample Identification

FB-04132010-RIG2-RZE
EB-04132010-RIG3-RZD

Introduction

This data review covers 2 soil samples listed on the cover sheet. The analyses were per EPA Method 314.0 for Perchlorate.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

All criteria for the initial calibration were met.

b. Calibration Verification

Calibration verification frequency and analysis criteria were met.

III. Blanks

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

Sample EB-04132010-RIG3-RZD was identified as an equipment blank. No perchlorate were found in this blank.

Sample FB-04132010-RIG2-RZE was identified as a field blank. No perchlorate were found in this blank.

IV. Matrix Spike/Matrix Spike Duplicates

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

V. Duplicates

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

VI. Laboratory Control Samples

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

VII. 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 280-2400-2	All analytes reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VIII. Overall Assessment

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, PCS, Henderson, Nevada
Perchlorate - Data Qualification Summary - SDG 280-2400-2

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2400-2	FB-04132010-RIG2-RZE EB-04132010-RIG3-RZD	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Perchlorate - Laboratory Blank Data Qualification Summary - SDG 280-2400-2

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Equipment Blank Data Qualification Summary - SDG 280-2400-2

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Field Blank Data Qualification Summary - SDG 280-2400-2

No Sample Data Qualified in this SDG

LDC #: 23252C6
SDG #: 280-2400-2
Laboratory: Test America

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

Date: 6-3-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: W

METHOD: (Analyte) Perchlorate (EPA Method 314.0)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/13/10
IIa.	Initial calibration	A	
IIb.	Calibration verification	A	
III.	Blanks	A	
IV	Matrix Spike/Matrix Spike Duplicates	N	Client specified
V	Duplicates	N	↓
VI.	Laboratory control samples	A	LCS/D
VII.	Sample result verification	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X	Field blanks	ND	FB=1, EB=2 (no associated samples)

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	FB-04132010-RIG2-RZE	11	PBW	21		31	
2	EB-04132010-RIG3-RZD	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, PCS, Henderson, Nevada

Collection Date: April 14, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Perchlorate

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2448-13

Sample Identification

SSAN6-01-2BPC
SSAN6-01-2BPCMS
SSAN6-01-2BPCMSD
SSAN6-01-2BPCDUP

Introduction

This data review covers 4 soil samples listed on the cover sheet. The analyses were per EPA Method 314.0 for Perchlorate.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

All criteria for the initial calibration were met.

b. Calibration Verification

Calibration verification frequency and analysis criteria were met.

III. Blanks

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

Samples EB-04142010-RIG1-RZC and EB-04142010-RIG2-RZC (both from SDG 280-2448-2) were identified as equipment blanks. No perchlorate was found in these blanks with the following exceptions:

Equipment Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
EB-04142010-RIG2-RZC	4/14/10	Perchlorate	2.3 ug/L	All samples in SDG 280-2448-13

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

Sample FB-04072010-RZC (from SDG 280-2280-2) was identified as a field blank. No perchlorate was found in this blank.

IV. Matrix Spike/Matrix Spike Duplicates

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

V. Duplicates

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable. Results were within QC limits.

VI. Laboratory Control Samples

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

VII. 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 280-2448-13	All analytes reported below the PQL.	J (all detects)	A

VIII. Overall Assessment

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, PCS, Henderson, Nevada
Perchlorate - Data Qualification Summary - SDG 280-2448-13

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2448-13	SSAN6-01-2BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Laboratory Blank Data Qualification Summary - SDG 280-2448-13

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Equipment Blank Data Qualification Summary - SDG 280-2448-13

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Field Blank Data Qualification Summary - SDG 280-2448-13

No Sample Data Qualified in this SDG

LDC #: 23252E6
SDG #: 280-2448-13
Laboratory: Test America

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage ~~2~~ 4

Date: 6-3-10
Page: 1 of 1
Reviewer: AR
2nd Reviewer: [illegible]

METHOD: (Analyte) Perchlorate (EPA Method 314.0)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/14/10
IIa.	Initial calibration	A	
IIb.	Calibration verification	A	
III.	Blanks	A	
IV	Matrix Spike/Matrix Spike Duplicates	A	MS/D
V	Duplicates	A	DUP
VI.	Laboratory control samples	A	LCS/D
VII.	Sample result verification	A	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X	Field blanks	SW	FB = FB-04072010-RZC (280-2280-2), EB = EB-04142010-RIG1-RZC = EB-04142010-RIG2-RZC (SDG# 280-2448-2)

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: Soil

1	SSAN6-01-2BPC	11	PBS	21		31	
2	SSAN6-01-2BPCMS	12		22		32	
3	SSAN6-01-2BPCMSD	13		23		33	
4	SSAN6-01-2BPCDUP	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:

LDC #: 23252E6
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: CR
2nd Reviewer:

Method: Inorganics (EPA Method See cover)

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Calibration				
Were all instruments calibrated daily, each set-up time?	✓			
Were the proper number of standards used?	✓			
Were all initial calibration correlation coefficients ≥ 0.995?	✓			
Were all initial and continuing calibration verification %Rs within the 90-110% QC limits?	✓			
Were titrant checks performed as required? (Level IV only)			✓	
Were balance checks performed as required? (Level IV only)			✓	
III. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
IV. Matrix Spike/Matrix Spike Duplicate				
Were a matrix spike (MS) and duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD or MS/DUP. Soil / Water.	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the 75-125 QC limits? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.	✓			
Were the MS/MSD or duplicate relative percent differences (RPD) ≤ 20% for waters and ≤ 35% for soil samples? A control limit of ≤ CRDL(≤ 2X CRDL for soil) was used for samples that were ≤ 5X the CRDL, including when only one of the duplicate sample values were < 5X the CRDL.	✓			
V. Laboratory Control Samples				
Was an LCS anaytzed 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% (85-115% for Method 300.0) QC limits?	✓			
VI. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	

LDC #: 23252B6
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

Reviewer: CR
2nd Reviewer: LW

Validation Area	Yes	No	NA	Findings/Comments
VII. Sample Result Verification				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
Were detection limits < RL?	✓			
VIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
IX. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target analytes were detected in the field duplicates.			✓	
X. Field blanks				
Field blanks were identified in this SDG.	✓			
Target analytes were detected in the field blanks.	✓			

LDC #: 23162F6
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: QR
2nd Reviewer: [illegible]

METHOD: Inorganics, EPA Method See Cover

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

Blank units: ug/L **Associated sample units: mg/Kg** Reason Code: be

Sampling date: 4/14/10 Soil factor applied 10x

Field blank type: (circle one) Field Blank / Rinsate / Other: (EB) Associated Samples: All

Analyte	Blank ID	Action Limit	Sample Identification							
	EB-04142010-RIG2-RZC (SDG#: 280-2448-2)		No Quals							
ClO4	2.3	0.23								

LDC #: 23832B6
SDG #: see cover

Validatin Findings Worksheet
Initial and Continuing Calibration Calculation Verification

Page: 1 of 1
Reviewer: CR
2nd Reviewer: LA

Method: Inorganics, Method 314.0

The correlation coefficient (r) for the calibration of ClO4 was recalculated. Calibration date: 4/21/10

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

%R = Found X 100 / True

Where, Found = concentration of each analyte measured in the analysis of the ICV or CCV solution
True = concentration of each analyte in the ICV or CCV source

Type of analysis	Analyte	Standard	Conc. (ug/l)	Area	Recalculated r or r^2	Reported r or r^2	Acceptable (Y/N)
Initial calibration	ClO4	s1	1	0.00247	*0.998766*	0.998766	Y
		s2	2.5	0.00841			
		s3	5	0.01661			
		s4	10	0.03291			
		s5	20	0.06345			
		s6	40	0.14097			
Calibration verification		ICV	20	Found (ug/L) 18.889	94	-	
Calibration verification		CCV	10	9.971	100	-	
Calibration verification							

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

LDC #: 33224-6
SDG #: Seecover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

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

METHOD: Inorganics, Method Seecover

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

$$\%R = \frac{Found}{True} \times 100$$

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

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

$$RPD = \frac{|S-D|}{(S+D)/2} \times 100$$

Where,
S = Original sample concentration
D = Duplicate sample concentration

Sample ID	Type of Analysis	Element	Found / S (~~units~~) mg/kg	True / D (~~units~~) mg/kg	Recalculated %R / RPD	Reported %R / RPD	Acceptable (Y/N)
LCS	Laboratory control sample	ClO_4	0.0917	0.0986	93	93	Y
2	Matrix spike sample	↓	(SSR-SR) 223	211	106	108	↓
4	Duplicate sample	↓	480	471	2	1	↓

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 #: 23525286
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

METHOD: Inorganics, Method see cover

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

Y N N/A Have results been reported and calculated correctly?
Y N N/A Are results within the calibrated range of the instruments?
Y N N/A Are all detection limits below the CRQL?

Compound (analyte) results for ClO4 reported with a positive detect were recalculated and verified using the following equation:

Concentration = $\frac{\left(\frac{\text{Area} - \text{Offset}}{\text{Slope}}\right) DF}{\%\ \text{Solid}}$

Recalculation: $\frac{\left(\frac{0.07628 + 0.0008}{0.0034}\right) 2000}{1000 \cdot (0.94)} = 480\ mg/kg$

#	Sample ID	Analyte	Reported Concentration (mg/kg)	Calculated Concentration (mg/kg)	Acceptable (Y/N)
	1	ClO4	480	480	Y

Note: _____

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 22, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Perchlorate

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2771-1

Sample Identification

SSAM2-01-1BPC**
SSAM2-01-5BPC
SSAM2-01-1BPC_FD
SSAM2-01-5BPCMS
SSAM2-01-5BPCMSD
SSAM2-01-5BPCDUP

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 6 soil samples listed on the cover sheet. The analyses were per EPA Method 314.0 for Perchlorate.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

All criteria for the initial calibration were met.

b. Calibration Verification

Calibration verification frequency and analysis criteria were met.

III. Blanks

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

Sample FB-04132010-RIG2-RZE (from SDG 280-2400-2) was identified as a field blank. No perchlorate was found in this blank.

IV. Matrix Spike/Matrix Spike Duplicates

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

V. Duplicates

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable. Results were within QC limits.

VI. Laboratory Control Samples

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

VII. Sample Result Verification and Project Quantitation Limit

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

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2771-1	All analytes reported below the PQL.	J (all detects)	A

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

VIII. Overall Assessment

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

IX. Field Duplicates

Samples SSAM2-01-1BPC** and SSAM2-01-1BPC_FD were identified as field duplicates. No perchlorate was detected in any of the samples with the following exceptions:

Analyte	Concentration (mg/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SSAM2-01-1BPC**	SSAM2-01-1BPC_FD				
Perchlorate	0.015	0.011	-	0.004 (≤0.011)	-	-

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Data Qualification Summary - SDG 280-2771-1

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2771-1	SSAM2-01-1BPC** SSAM2-01-5BPC SSAM2-01-1BPC_FD	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Laboratory Blank Data Qualification Summary - SDG 280-2771-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Field Blank Data Qualification Summary - SDG 280-2771-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B /4

LDC #: 23252F6
SDG #: 280-2771-1
Laboratory: Test America

Date: 6-3-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: W

METHOD: (Analyte) Perchlorate (EPA Method 314.0)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/22/10
IIa.	Initial calibration	A	
IIb.	Calibration verification	A	
III.	Blanks	A	
IV	Matrix Spike/Matrix Spike Duplicates	A	MS/D
V	Duplicates	A	Dup
VI.	Laboratory control samples	A	LCS
VII.	Sample result verification	A	Not reviewed for 2B
VIII.	Overall assessment of data	A	
IX.	Field duplicates	SW	(1,3)
X	Field blanks	ND	FB = FB-04132010-RINSE2-RZE (280-2400-2)

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: 60,1 ** Level 4

1	SSAM2-01-1BPC **	11	POS	21		31	
2	SSAM2-01-5BPC	12		22		32	
3	SSAM2-01-1BPC_FD	13		23		33	
4	SSAM2-01-5BPCMS	14		24		34	
5	SSAM2-01-5BPCMSD	15		25		35	
6	SSAM2-01-5BPCDUP	16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

LDC #: 23252F6
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: CR
2nd Reviewer: MV

Method: Inorganics (EPA Method See Cover)

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Calibration				
Were all instruments calibrated daily, each set-up time?	✓			
Were the proper number of standards used?	✓			
Were all initial calibration correlation coefficients ≥ 0.995?	✓			
Were all initial and continuing calibration verification %Rs within the 90-110% QC limits?	✓			
Were titrant checks performed as required? (Level IV only)			✓	
Were balance checks performed as required? (Level IV only)			✓	
III. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
IV. Matrix Spike/Matrix Spike Duplicates				
Were a matrix spike (MS) and duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD or MS/DUP. Soil / Water.	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the 75-125 QC limits? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.	✓			
Were the MS/MSD or duplicate relative percent differences (RPD) ≤ 20% for waters and ≤ 35% for soil samples? A control limit of ≤ CRDL(≤ 2X CRDL for soil) was used for samples that were ≤ 5X the CRDL, including when only one of the duplicate sample values were < 5X the CRDL.	✓			
V. Laboratory Control Samples				
Was an LCS anaylzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the 80-120% (85-115% for Method 300.0) QC limits?	✓			
VI. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	

LDC #: 23252F6
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

Reviewer: CR
2nd Reviewer: W

Validation Area	Yes	No	NA	Findings/Comments
VII. Sample Result Verification				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
Were detection limits < RL?	✓			
VIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
IX. Field duplicates				
Field duplicate pairs were identified in this SDG.	✓			
Target analytes were detected in the field duplicates.	✓			
X. Field blanks				
Field blanks were identified in this SDG.	✓			
Target analytes were detected in the field blanks.		✓		

LDC#: 23252F6
SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: CO
2nd Reviewer:

Inorganics, Method: See Cover

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

Analyte	Concentration (mg/Kg)		RPD (≤50)	Difference	Limits	Qualification (Parent only)
	1	3				
Perchlorate	0.015	0.011		0.004	(≤0.011)	

V:\FIELD DUPLICATES\FD_inorganic\23252F6.wpd

LDC #: 23252F6
SDG #: see cover

Validatin Findings Worksheet
Initial and Continuing Calibration Calculation Verification

Reviewer: QR
2nd Reviewer: M

Method: Inorganics, Method 314.0

The correlation coefficient (r) for the calibration of ClO4 was recalculated. Calibration date: 4/21/10

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

$$\%R = \frac{\text{Found} \times 100}{\text{True}}$$

Where, Found = concentration of each analyte measured in the analysis of the ICV or CCV solution
True = concentration of each analyte in the ICV or CCV source

Type of analysis	Analyte	Standard	Conc. (ug/l)	Area	Recalculated r or r^2	Reported r or r^2	Acceptable (Y/N)
Initial calibration	ClO4	s1	1	0.0024	*0.998771*	0.998753	Y
		s2	2.5	0.00841			
		s3	5	0.01661			
		s4	10	0.03291			
		s5	20	0.06345			
		s6	40	0.14097			
Calibration verification		ICV	20	18.888	94	-	
Calibration verification		CCV	30	29.162	97	-	
Calibration verification							

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

LDC #: 23282F6
SDG #: Seecover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

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

METHOD: Inorganics, Method Seecover

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

%R = Found / True x 100 Where, Found = concentration of each analyte measured in the analysis of the sample. For the matrix spike calculation, Found = SSR (spiked sample result) - SR (sample result).
True = concentration of each analyte in the source.

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

RPD = |S-D| / (S+D)/2 x 100 Where, S = Original sample concentration
D = Duplicate sample concentration

Sample ID	Type of Analysis	Element	Found / S (units) mg/kg	True / D (units) mg/kg	Recalculated %R / RPD	Reported %R / RPD	Acceptable (Y/N)
LCS	Laboratory control sample	ClO4	0.101	0.0995	102	101	Y
4	Matrix spike sample		(SSR-SR) 0.104	0.112	93	93	
6	Duplicate sample		0.042	0.0425	1	1	

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 #: 23252F6
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

METHOD: Inorganics, Method see cover

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

Y N N/A Have results been reported and calculated correctly?
Y N N/A Are results within the calibrated range of the instruments?
Y N N/A Are all detection limits below the CRQL?

Compound (analyte) results for ClO4 reported with a positive detect were recalculated and verified using the following equation:

Concentration = $\frac{\left(\frac{\text{Area} - \text{offset}}{\text{Slope}}\right) \text{Prep Factor}}{\%\ \text{Solid}}$

Recalculation: $\frac{\left(\frac{(0.00371 + 0.0009)}{0.0034}\right) 10}{1000} = 0.015\ \text{mg/kg}$

$\frac{}{(0.899)}$

#	Sample ID	Analyte	Reported Concentration (mg/kg)	Calculated Concentration (mg/kg)	Acceptable (Y/N)
	1	ClO4	0.015	0.015	Y

Note: _____

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 23, 2010

LDC Report Date: June 4, 2010

Matrix: Soil

Parameters: Perchlorate

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2836-1

Sample Identification

SSAM3-02-1BPC
SSAM3-02-5BPC
SSAJ2-01-1BPC
SSAJ2-01-5BPC
SSAM3-02-1BPC_FD
SSAM3-02-1BPCMS
SSAM3-02-1BPCMSD
SSAM3-02-1BPCDUP

Introduction

This data review covers 8 soil samples listed on the cover sheet. The analyses were per EPA Method 314.0 for Perchlorate.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

All criteria for the initial calibration were met.

b. Calibration Verification

Calibration verification frequency and analysis criteria were met.

III. Blanks

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

Samples FB-04072010-RZD (from SDG 280-2216-2) and FB-04132010-RIG2-RZE (from SDG 280-2400-2) were identified as field blanks. No perchlorate were found in these blanks.

IV. 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.

V. Duplicates

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable. Results were within QC limits.

VI. Laboratory Control Samples

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

VII. 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 280-2836-1	All analytes reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VIII. Overall Assessment

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

IX. Field Duplicates

Samples SSAM3-02-1BPC and SSAM3-02-1BPC_FD were identified as field duplicates. No perchlorate was detected in any of the samples with the following exceptions:

Analyte	Concentration (mg/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SSAM3-02-1BPC	SSAM3-02-1BPC_FD				
Perchlorate	0.022	0.021	-	0.001 (≤0.012)	-	-

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Data Qualification Summary - SDG 280-2836-1

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2836-1	SSAM3-02-1BPC SSAM3-02-5BPC SSAJ2-01-1BPC SSAJ2-01-5BPC SSAM3-02-1BPC_FD	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Perchlorate - Laboratory Blank Data Qualification Summary - SDG 280-2836-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Equipment Blank Data Qualification Summary - SDG 280-2836-1

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252G6
SDG #: 280-2836-1
Laboratory: Test America

Date: 6-3-10
Page: 1 of 1
Reviewer: [signature]
2nd Reviewer: [signature]

METHOD: (Analyte) Perchlorate (EPA Method 314.0)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/23/10
IIa.	Initial calibration	A	
IIb.	Calibration verification	A	
III.	Blanks	A	
IV	Matrix Spike/Matrix Spike Duplicates	A	MS/D
V	Duplicates	A	DUP
VI.	Laboratory control samples	A	LCS/D
VII.	Sample result verification	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	SW	(1,5)
X	Field blanks	ND	FB= FB-04072010-R2D (280-22162), FB-04132010-RIG2-RE (280-24002-2)

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: Soil

1	SSAM3-02-1BPC	11	PBS	21		31	
2	SSAM3-02-5BPC	12		22		32	
3	SSAJ2-01-1BPC	13		23		33	
4	SSAJ2-01-5BPC	14		24		34	
5	SSAM3-02-1BPC_FD	15		25		35	
6	SSAM3-02-1BPCMS	16		26		36	
7	SSAM3-02-1BPCMSD	17		27		37	
8	SSAM3-02-1BPCDUP	18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

LDC#: 23252G6
SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: CK
2nd Reviewer: [illegible]

Inorganics, Method: See Cover

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

Analyte	Concentration (mg/Kg)		RPD (≤50)	Difference	Limits	Qualification (Parent only)
	1	5				
Perchlorate	0.022	0.021		0.001	(≤0.012)	

V:\FIELD DUPLICATES\FD_inorganic\23252G6.wpd

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 26, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Perchlorate

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2879-1

Sample Identification

SSAJ2-02-1BPC
SSAJ2-02-5BPC**
SSAR6-04-1BPC
SSAR6-04-5BPC**
SSAJ2-02-1BPCMS
SSAJ2-02-1BPCMSD
SSAJ2-02-1BPCDUP

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 7 soil samples listed on the cover sheet. The analyses were per EPA Method 314.0 for Perchlorate.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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

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

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

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

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

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

All criteria for the initial calibration were met.

b. Calibration Verification

Calibration verification frequency and analysis criteria were met.

III. Blanks

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

Samples FB-04072010-RZD (from SDG 280-2216-2) and FB04062010-RZB (from SDG 280-2131-2) were identified as field blanks. No perchlorate was found in these blanks with the following exceptions:

Field Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
FB04062010-RZB	4/6/10	Perchlorate	92 ug/L	SSAR6-04-1BPC SSAR6-04-5BPC**

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

IV. Matrix Spike/Matrix Spike Duplicates

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

V. Duplicates

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable. Results were within QC limits.

VI. Laboratory Control Samples

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

VII. Sample Result Verification and Project Quantitation Limit

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

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2879-1	All analytes reported below the PQL.	J (all detects)	A

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

VIII. Overall Assessment

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, PCS, Henderson, Nevada
Perchlorate - Data Qualification Summary - SDG 280-2879-1

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2879-1	SSAJ2-02-1BPC SSAJ2-02-5BPC** SSAR6-04-1BPC SSAR6-04-5BPC**	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Laboratory Blank Data Qualification Summary - SDG 280-2879-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Field Blank Data Qualification Summary - SDG 280-2879-1

No Sample Data Qualified in this SDG

LDC #: 23252H6
SDG #: 280-2879-1
Laboratory: Test America

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B /4

Date: 6-3-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: [illegible]

METHOD: (Analyte) Perchlorate (EPA Method 314.0)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/26/10
IIa.	Initial calibration	A	
IIb.	Calibration verification	A	
III.	Blanks	A	
IV	Matrix Spike/Matrix Spike Duplicates	A	MS/D
V	Duplicates	A	DUP
VI.	Laboratory control samples	A	LCS
VII.	Sample result verification	A	Not reviewed for 2B
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X	Field blanks	SW	FB= FB-04072010-RZD (280-22216-2), FB04062010-RZB (280-2131-2)

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

**Level 4

Validated Samples: Soil

1	SSAJ2-02-1BPC	11	PDS	21		31	
2	SSAJ2-02-5BPC **	12		22		32	
3	SSAR6-04-1BPC	13		23		33	
4	SSAR6-04-5BPC **	14		24		34	
5	SSAJ2-02-1BPCMS	15		25		35	
6	SSAJ2-02-1BPCMSD	16		26		36	
7	SSAJ2-02-1BPCDUP	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

LDC #: 23252H6
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

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

Method: Inorganics (EPA Method see cover)

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Calibration				
Were all instruments calibrated daily, each set-up time?	✓			
Were the proper number of standards used?	✓			
Were all initial calibration correlation coefficients > 0.995?	✓			
Were all initial and continuing calibration verification %Rs within the 90-110% QC limits?	✓			
Were titrant checks performed as required? (Level IV only)			✓	
Were balance checks performed as required? (Level IV only)			✓	
III. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
IV. Matrix Spike/Matrix Spike Duplicate				
Were a matrix spike (MS) and duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD or MS/DUP. Soil / Water.	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the 75-125 QC limits? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.	✓			
Were the MS/MSD or duplicate relative percent differences (RPD) ≤ 20% for waters and ≤ 35% for soil samples? A control limit of ≤ CRDL(≤ 2X CRDL for soil) was used for samples that were ≤ 5X the CRDL, including when only one of the duplicate sample values were < 5X the CRDL.	✓			
V. Laboratory Control Samples				
Was an LCS anaylzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the 80-120% (85-115% for Method 300.0) QC limits?	✓			
VI. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	

LDC #: 23252H6
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

Reviewer: CR
2nd Reviewer: W

Validation Area	Yes	No	NA	Findings/Comments
VII. Sample Result Verification				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
Were detection limits < RL?	✓			
VIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
IX. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target analytes were detected in the field duplicates.			✓	
X. Field blanks				
Field blanks were identified in this SDG.	✓			
Target analytes were detected in the field blanks.	✓			

LDC #: 23204A6
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: QR
2nd Reviewer: LA

METHOD: Inorganics, EPA Method See Cover

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

Blank units: ug/L **Associated sample units: mg/Kg** Reason Code: bf

Sampling date: 4/6/10 Soil factor applied 10x

Field blank type: (circle one) (Field Blank) / Rinsate / Other: Associated Samples: 3,4

Analyte	Blank ID	Action Limit	Sample Identification							
	FB04062010-RZB (SDG#: 280-2131-2)		NDQ(0.15 (>0.1))							
ClO4	92	9.2								

LDC #: 23252#6
SDG #: see cover

Validatin Findings Worksheet
Initial and Continuing Calibration Calculation Verification

Reviewer: CR
2nd Reviewer: V

Method: Inorganics, Method 314.0

The correlation coefficient (r) for the calibration of ClO4 was recalculated. Calibration date: 4/21/10

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

$$\%R = \frac{\text{Found} \times 100}{\text{True}}$$

Where, Found = concentration of each analyte measured in the analysis of the ICV or CCV solution
True = concentration of each analyte in the ICV or CCV source

Type of analysis	Analyte	Standard	Conc. (ug/l)	Area	Recalculated r or r^2	Reported r or r^2	Acceptable (Y/N)
Initial calibration	ClO4	s1	1	0.0025	*0.998765*	0.998771	Y
		s2	2.5	0.00841			
		s3	5	0.01661			
		s4	10	0.03291			
		s5	20	0.06345			
		s6	40	0.14097			
Calibration verification		ICV	20	18,890	94	-	
Calibration verification		CCV10	10	9,350	94	-	
Calibration verification		CCV30	30	29,080	97	-	

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

LDC #: 23252#6
SDG #: 5ecover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

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

METHOD: Inorganics, Method Secover

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

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

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

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

Sample ID	Type of Analysis	Element	Found / S (units)	True / D (units)	Recalculated %R / RPD	Reported %R / RPD	Acceptable (Y/N)
LCS	Laboratory control sample	Cd	0.0844	0.0990	85	85	Y
5	Matrix spike sample		(SSR-SR) 49	53.7	91	92	
7	Duplicate sample		60	64.3	7	7	

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 #: 23252H6
SDG #: seecover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

METHOD: Inorganics, Method seecover

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

Y N N/A Have results been reported and calculated correctly?
Y N N/A Are results within the calibrated range of the instruments?
Y N N/A Are all detection limits below the CRQL?

Compound (analyte) results for ClO4 reported with a positive detect were recalculated and verified using the following equation:

Concentration = $\frac{\left(\frac{\text{Area} - \text{offset}}{\text{slope}}\right)(DF)(\text{Prep Factor})}{\%\text{Solid}}$

Recalculation: $\frac{\left(\frac{0.05121 + 0.0008}{0.0034}\right)(100)(10)}{1000}}{(0.92)} = 17\ mg/kg$

#	Sample ID	Analyte	Reported Concentration (mg/kg	Calculated Concentration (mg/kg	Acceptable (Y/N)
	2	ClO4	18	17	Y

Note: _____

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 27, 2010

LDC Report Date: June 7, 2010

Matrix: Soil

Parameters: Perchlorate

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2960-1

Sample Identification

SSAR7-02-1BPC
SSAR7-02-5BPC
SSAR7-03-1BPC
SSAR7-03-5BPC
SSAR7-04-1BPC
SSAR7-04-5BPC

Introduction

This data review covers 6 soil samples listed on the cover sheet. The analyses were per EPA Method 314.0 for Perchlorate.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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

All criteria for the initial calibration were met.

b. Calibration Verification

Calibration verification frequency and analysis criteria were met.

III. Blanks

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

Sample FB-04062010-RZB (from SDG 280-2131-2) was identified as a field blank. No perchlorate were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
FB-04062010-RZB	4/6/10	Perchlorate	92 ug/L	All samples in SDG 280-2960-1

Sample concentrations were compared to concentrations detected in the field blanks. The sample concentrations were either not detected or were significantly greater (>5X blank contaminants) than the concentrations found in the associated field blanks with the following exceptions:

Sample	Analyte	Reported Concentration	Modified Final Concentration
SSAR7-02-1BPC	Perchlorate	0.17 mg/Kg	0.17J+ mg/Kg
SSAR7-02-5BPC	Perchlorate	0.24 mg/Kg	0.24J+ mg/Kg
SSAR7-03-1BPC	Perchlorate	1.6 mg/Kg	1.6J+ mg/Kg
SSAR7-03-5BPC	Perchlorate	1.1 mg/Kg	1.1J+ mg/Kg

Sample	Analyte	Reported Concentration	Modified Final Concentration
SSAR7-04-1BPC	Perchlorate	0.58 mg/Kg	0.58J+ mg/Kg
SSAR7-04-5BPC	Perchlorate	0.48 mg/Kg	0.48J+ mg/Kg

IV. Matrix Spike/Matrix Spike Duplicates

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

V. Duplicates

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

VI. Laboratory Control Samples

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

VII. 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 280-2960-1	All analytes reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VIII. Overall Assessment

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, PCS, Henderson, Nevada
Perchlorate - Data Qualification Summary - SDG 280-2960-1

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2960-1	SSAR7-02-1BPC SSAR7-02-5BPC SSAR7-03-1BPC SSAR7-03-5BPC SSAR7-04-1BPC SSAR7-04-5BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Perchlorate - Laboratory Blank Data Qualification Summary - SDG 280-2960-1

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Field Blank Data Qualification Summary - SDG 280-2960-1

SDG	Sample	Analyte	Modified Final Concentration	A or P	Code
280-2960-1	SSAR7-02-1BPC	Perchlorate	0.17J+ mg/Kg	A	bf
280-2960-1	SSAR7-02-5BPC	Perchlorate	0.24J+ mg/Kg	A	bf
280-2960-1	SSAR7-03-1BPC	Perchlorate	1.6J+ mg/Kg	A	bf
280-2960-1	SSAR7-03-5BPC	Perchlorate	1.1J+ mg/Kg	A	bf
280-2960-1	SSAR7-04-1BPC	Perchlorate	0.58J+ mg/Kg	A	bf
280-2960-1	SSAR7-04-5BPC	Perchlorate	0.48J+ mg/Kg	A	bf

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23252J6
SDG #: 280-2960-1
Laboratory: Test America

Date: 6-3-10
Page: 1 of 1
Reviewer: CA
2nd Reviewer: W

METHOD: (Analyte) Perchlorate (EPA Method 314.0)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 4/27/10
IIa.	Initial calibration	A	
IIb.	Calibration verification	A	
III.	Blanks	A	
IV	Matrix Spike/Matrix Spike Duplicates	N	Client specified
V	Duplicates	N	↓
VI.	Laboratory control samples	A	LCS
VII.	Sample result verification	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X	Field blanks	SW	FB = FB04062010-RZB (280-2131-2)

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: Soil

1	SSAR7-02-1BPC	11	PDS	21		31	
2	SSAR7-02-5BPC	12		22		32	
3	SSAR7-03-1BPC	13		23		33	
4	SSAR7-03-5BPC	14		24		34	
5	SSAR7-04-1BPC	15		25		35	
6	SSAR7-04-5BPC	16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

LDC #: ~~23204A6~~ 23252J6
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

METHOD: Inorganics, EPA Method See Cover

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

Blank units: ug/L **Associated sample units: mg/Kg** Reason Code: bf
Sampling date: 4/6/10 Soil factor applied 10x
Field blank type: (circle one) (Field Blank) / Rinsate / Other: Associated Samples: All

Analyte	Blank ID	Action Limit	Sample Identification							
[redacted]	FB04062010-RZB (SDG#: 280-2131-2)		1	2	3	4	5	6		
ClO4	92	9.2	0.17 J+	0.24 J+	1.6 J+	1.1 J+	0.58 J+	0.48 J+		