LABORATORY DATA CONSULTANTS, INC.
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ERM
2525 Natomas Park Drive, Suite 350
Sacramento, CA 95833
ATTN: Ms. Maria Barajas-Albalawi

August 20, 2008

SUBJECT: BRC Tronox Parcel F, Data Validation

Dear Ms. Barajas-Albalawi

Enclosed are the final validation reports for the fractions listed below. This SDG was received on August 14, 2008. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 19307:

SDG #	Fraction
IRF0782	2,2'-/4,4'-Dichlorobenzil, Hexavalent Chromium & Chlorite

The data validation was performed under EPA Level III guidelines. The analyses were validated using the following documents, as applicable to each method:

- USEPA, Contract Laboratory Program National Functional Guidelines for Organic Data Review, October 1999
- USEPA, Contract Laboratory Program National Functional Guidelines for Inorganic Data Review, October 2004
- EPA SW 846, Third Edition, Test Methods for Evaluating Solid Waste, update 1, July 1992; update IIA, August 1993; update II, September 1994; update IIB, January 1995; update III, December 1996; update IIIA, April 1998; IIIB, November 2004; Update IV, February 2007

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

Sincerely,

Erlinda T. Rauto
Operations Manager/Senior Chemist

Priority 348 Pages-CD

Attachment 1

80/20

LDC #19307 (ERM-Sacramento / BRC Tronox, Parcel F)

LDC	SDG#	DATE REC'D	(3) DATE DUE	2,2'/4,4' -DCB (8270C)		Chlorite (300.1)		Cr(VI) (7196A)																											
Matrix:	Water/Soil			W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S
A	IRF0782	08/14/08	08/22/08	0	3	0	3	0	3																										
Total	T/LR			0	3	0	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	9

Shaded cells indicate Level IV validation (all other cells are Level IIII validation). These sample counts do not include MS/MSD, and DUPs

19307ST.wpd

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox Parcel F

Collection Date: June 4, 2008

LDC Report Date: August 19, 2008

Matrix: Soil

Parameters: 2,2'-/4,4'-Dichlorobenzil

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): IRF0782

Sample Identification

TSB-FR-02-02-0'
TSB-FJ-02-02-0'
TSB-FJ-06-02-0'

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for 2,2'-/4,4'-Dichlorobenzil.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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

The following are definitions of the data qualifiers:

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

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

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

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

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

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

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 2,2'-/4,4'-Dichlorobenzil .

Average relative response factors (RRF) for 2,2'-/4,4'-Dichlorobenzil were within validation criteria.

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

All of the continuing calibration percent differences (%D) between the initial calibration RRF and the continuing calibration RRF were less than or equal to 25.0% .

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

All of the continuing calibration RRF values were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No 2,2'-/4,4'-Dichlorobenzil was found in the method blanks.

No field blanks were identified 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

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

Raw data were not reviewed for this SDG.

XII. Compound Quantitation and CRQLs

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 of Data

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 Parcel F
2,2'-/4,4'-Dichlorobenzil - Data Qualification Summary - SDG IRF0782

No Sample Data Qualified in this SDG

Tronox Parcel F
2,2'-/4,4'-Dichlorobenzil - Laboratory Blank Data Qualification Summary - SDG IRF0782

No Sample Data Qualified in this SDG

Tronox Parcel F
2,2'-/4,4'-Dichlorobenzil - Field Blank Data Qualification Summary - SDG IRF0782

No Sample Data Qualified in this SDG

LDC #: 19307A2 b

SDG #: IRF0782

Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET

Level III

Date: 8/18/08

Page: 1 of 1

Reviewer:

2nd Reviewer:

METHOD: GC/MS 2,2'-/4,4'-Dichlorobenzil (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: 6/4/08
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	no ccc & spcc
IV.	Continuing calibration/ICV	A	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	N	

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

Validated Samples:

1	TSB-FR-02-02-0' S	11	SF11064-Blk	21		31	
2	TSB-FJ-~~08-0~~02-02-0'	12		22		32	
3	TSB-FJ-06-02-0'	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	

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel F

Collection Date: June 4, 2008

LDC Report Date: August 20, 2008

Matrix: Soil

Parameters: Hexavalent Chromium & Chlorite

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): IRF0782

Sample Identification

TSB-FR-02-02-0'
TSB-FJ-02-02-0'
TSB-FJ-06-02-0'
TSB-FR-02-02-0'MS
TSB-FR-02-02-0'MSD

Introduction

This data review covers 5 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA Method 300.1 for Chlorite and EPA SW 846 Method 7196A for Hexavalent Chromium.

The review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section X.

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.

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 of each method were met.

b. Calibration Verification

Calibration verification frequency and analysis criteria were met for each method when applicable.

III. Blanks

Method blanks were reviewed for each matrix as applicable. No chlorite or hexavalent chromium was found in the initial, continuing and preparation blanks.

No field blanks were identified in this SDG.

IV. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the 300.1 method. All surrogate recoveries (%R) were within QC limits.

V. 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 with the following exceptions:

Spike ID (Associated Samples)	Analyte	MS (%R) (Limits)	MSD (%R) (Limits)	RPD (Limits)	Flag	A or P
TSB-FR-02-02-0'MS/MSD (All samples in SDG IRF0782)	Chlorite	0 (75-125)	19 (75-125)	-	J- (all detects) R (all non-detects)	A

VI. Duplicates

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

VII. Laboratory Control Samples

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

VIII. Sample Result Verification

Raw data were not reviewed for this SDG.

IX. Overall Assessment of Data

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

X. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel F
Hexavalent Chromium & Chlorite - Data Qualification Summary - SDG IRF0782

SDG	Sample	Analyte	Flag	A or P	Reason
IRF0782	TSB-FR-02-02-0' TSB-FJ-02-02-0" TSB-FJ-06-02-0'	Chlorite	J- (all detects) R (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R)

BRC Tronox Parcel F
Hexavalent Chromium & Chlorite - Laboratory Blank Data Qualification Summary - SDG IRF0782

No Sample Data Qualified in this SDG

BRC Tronox Parcel F
Hexavalent Chromium & Chlorite - Field Blank Data Qualification Summary - SDG IRF0782

No Sample Data Qualified in this SDG

LDC #: 19307A6
SDG #: IRF0782
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III

Date: 8/18/08
Page: 1 of 1
Reviewer: [signature]
2nd Reviewer: [signature]

METHOD: (Analyte) Chlorite (EPA Method 300.1), Hexavalent Chromium (EPA SW846 Method 7196A)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/4/08
IIa.	Initial calibration	A	
IIb.	Calibration verification	A	
III.	Blanks	A	
IV	Surrogate Spikes	A	
V	Matrix Spike/Matrix Spike Duplicates	SW	MS/MSD
VI.	Duplicates	N	
VII.	Laboratory control samples	A	LCS
VIII.	Sample result verification	N	
IX.	Overall assessment of data	A	
X.	Field duplicates	N	
XI.	Field blanks	N	

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

Validated Samples:

All soil

1	TSB-FR-02-02-0'	11		21		31	
2	TSB-FJ-~~08-01~~-02-02-0	12		22		32	
* 3	TSB-FJ-06-02-0'	13		23		33	
4	TSB-FR-02-02-0'MS	14		24		34	
5	TSB-FR-02-02-0'MSD	15		25		35	
6	PB	16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 19307A6
SDG #: 1RF0782

VALIDATION FINDINGS WORKSHEET
Sample Specific Analysis Reference

Page: 1 of 1
Reviewer:
2nd reviewer:

All circled methods are applicable to each sample.

Sample ID	Parameter
1 - 3	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} Chlorite ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
QC sample 4 - 5	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} Chlorite ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____
	pH TDS Cl F NO_3 NO_2 SO_4 PO_4 ALK CN^- NH_3 TKN TOC CR^{6+} ____ ____ ____ ____

Comments: ____________________

LDC #: 19307A6
SDG #: JRF0782

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: CM
2nd Reviewer: LC

METHOD: Inorganics, EPA Method Sw Conv

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.

CM (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
	4/5	So	Chlorid	0	19	200 (≤20)	All	~~J/UJ/A~~ J/R/A no gwl RPD LCS 1-

Comments: _____