LABORATORY DATA CONSULTANTS, INC.
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July 12, 2010

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

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

Dear Ms. Arnold,

Enclosed are the final validation reports for the fraction listed below. These SDGs were received on June 25, 2010. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 23481:

SDG #	Fraction
280-2216-11, 280-2400-8, 280-2448-16 280-2836-2, 280-2879-2, 280-3624-4 280-3624-6, 280-3679-4, 280-3955-5	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,

Erlinda T. Rauto
Operations Manager/Senior Chemist

DL 06/29/10

Attachment 1

Stage 2B/4

LDC #23481 (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)		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
A	280-2216-11	06/29/10	07/21/10	-	-	-	-	-	-	-	-	-	-	0	1	-	-																		
B	280-2400-8	06/29/10	07/21/10	-	-	0	1	-	-	-	-	-	-	-	-	-	-																		
C	280-2448-16	06/29/10	07/21/10	-	-	-	-	-	-	-	-	-	-	0	1	-	-																		
D	280-2836-2	06/29/10	07/21/10	-	-	1	0	1	0	1	0	1	0	1	0	1	0																		
E	280-2879-2	06/29/10	07/21/10	1	0	1	0	-	-	-	-	-	-	-	-	-	-																		
F	280-3624-4	06/29/10	07/21/10	0	1	-	-	-	-	-	-	-	-	-	-	-	-																		
G	280-3624-6	06/29/10	07/21/10	-	-	-	-	-	-	-	-	-	-	-	-	0	1																		
H	280-3679-4	06/29/10	07/21/10	0	1	-	-	-	-	-	-	-	-	-	-	-	-																		
I	280-3955-5	06/29/10	07/21/10	-	-	-	-	-	-	-	-	-	-	0	4	-	-																		
Total	T/LR			1	2	2	1	1	0	1	0	1	0	1	6	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18

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

23481ST.wpd

EDD CHECKLIST

Reviewer: JE
2nd Reviewer: BC

LDC #: 23481
SDG #: 280-2216-11, 280-2400-8, 280-2448-16
280-2836-2, 280-2879-2, 280-3624-4
280-3624-6, 280-3679-4, 280-3955-5

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_LDC23481_071210.doc
IV. EDD Delivery				
Was the final EDD sent to the client?	X			

Tronox LLC Facility, PCS, Henderson, Nevada
Data Validation Reports
LDC #23481

Semivolatiles

LDC

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: April 26, 2010

LDC Report Date: July 9, 2010

Matrix: Soil

Parameters: Semivolatiles

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2879-2

Sample Identification

EB-04262010-1-RZD

Introduction

This data review covers one water 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.

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.

Sample EB-04262010-1-RZD was identified as an equipment 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

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 280-2879-2	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 280-2879-2

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2879-2	EB-04262010-1-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 280-2879-2

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Equipment Blank Data Qualification Summary - SDG 280-2879-2

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23481E2a
SDG #: 280-2879-2
Laboratory: Test America

Date: 7/08/10
Page: 1 of 1
Reviewer: SVL
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: 4/26/10
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	% RSD ≤
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/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	ND	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	EB-04262010-1-RZD	11		21		31	
2	MB 280-13139/1-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	

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: May 17, 2010

LDC Report Date: July 12, 2010

Matrix: Soil

Parameters: Semivolatiles

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-3624-4

Sample Identification

SSAN5-02-4BPC

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-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 with the following exceptions:

Sample	Surrogate	%R (Limits)	Compound	Flag	A or P
SSAN5-02-4BPC	Nitrobenzene-d5 2-Fluorobiphenyl	48 (50-120) 48 (50-120)	All TCL compounds	J- (all detects) UJ (all non-detects)	A

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 280-3624-4	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 280-3624-4

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-3624-4	SSAN5-02-4BPC	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Surrogate spikes (%R) (s)
280-3624-4	SSAN5-02-4BPC	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 280-3624-4

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Field Blank Data Qualification Summary - SDG 280-3624-4

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 4

LDC #: 23481F2a
SDG #: 280-3624-4
Laboratory: Test America

Date: 7/09/10
Page: 1 of 1
Reviewer: JV6
2nd Reviewer: Q

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: 5/17/10
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	2 RSD ✓
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 25%
V.	Blanks	A	
VI.	Surrogate spikes	SW	
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	A	
XII.	Compound quantitation/CRQLs	A	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	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: Soil

1	SSAN5-02-4BPC	11		21		31	
2	MB 280-16859/5-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 #: 23481 F2a
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: SV
2nd Reviewer: J

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 #: 23481F29
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: SVL
2nd Reviewer: A

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 #: 23481 Fa

SDG #: Sa Cmw

VALIDATION FINDINGS WORKSHEET
Surrogate Recovery

Page: 1 of 1

Reviewer: QV6

2nd Reviewer: 8

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

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

Y (N) N/A Were percent recoveries (%R) for surrogates within QC limits?

(Y) N N/A If 2 or more base neutral or acid surrogates were outside QC limits, was a reanalysis performed to confirm %R?

(Y) N N/A If any %R was less than 10 percent, was a reanalysis performed to confirm %R?

#	Date	Sample ID	Surrogate	%R (Limits)	Qualifications
		1	NBZ	48 (50-120)	J-/UJ/A (all fa) (s)
			FBP	48 (↓)	↓ ↓
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
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				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

* QC limits are advisory	QC Limits (Soil)	QC Limits (Water)		QC Limits (Soil)	QC Limits (Water)
S1 (NBZ) = Nitrobenzene-d5	23-120	35-114	S5 (2FP)= 2-Fluorophenol	25-121	21-100
S2 (FBP) = 2-Fluorobiphenyl	30-115	43-116	S6 (TBP) = 2,4,6-Tribromophenol	19-122	10-123
S3 (TPH) = Terphenyl-d14	18-137	33-141	S7 (2CP) = 2-Chlorophenol-d4	20-130*	33-110*
S4 (PHL) = Phenol-d5	24-113	10-94	S8 (DCB) = 1,2-Dichlorobenzene-d4	20-130*	16-110*

LDC #: 23481 #24
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: DVB
2nd Reviewer: 8

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	5/26/2010	1,4-Dioxane	(IS1)	0.5027	0.5027	0.5263	0.5263	3.1	3.06
	MSS K		Naphthalene	(IS2)	1.0468	1.0468	1.0463	1.0463	3.3	3.31
			Fluorene	(IS3)	1.3121	1.3121	1.3164	1.3164	3.6	3.62
			Hexachlorobenzene	(IS4)	0.2331	0.2331	0.2374	0.2374	5.3	5.33
			Chrysene	(IS5)	1.0301	1.0301	1.0388	1.0389	3.6	3.62
			Benzo(a)pyrene	(IS6)	1.0993	1.0993	1.0967	1.0967	7.1	7.15

nc IS/Cpd	Area cpd	Area IS
40/50	167190	266078
40/50	1337516	1022206
40/50	999226	609236
40/50	294751	1011668
40/50	1361944	1057674
40/50	1219171	887232

Conc	1,4-Dioxane	Naphthalene	Fluorene	Hexachlorob	Chrysene	Benzo(a)py
4.00	0.5549	1.0427	1.2674		1.0923	0.9816
10.00	0.5146	1.0144	1.2648	0.2205	1.0307	1.0205
20.00	0.5157	0.9915	1.2629	0.2208	1.0261	1.0189
50.00	**0.5027**	**1.0468**	**1.3121**	**0.2331**	**1.0301**	**1.0993**
80.00	0.5345	1.1001	1.3820	0.2491	1.0906	1.1725
120.00	0.5242	1.0841	1.3704	0.2478	1.0442	1.1631
160.00	0.5263	1.0499	1.3364	0.2478	1.0176	1.1562
200.00	0.5373	1.0411	1.3352	0.2426	0.9792	1.1613
X =	0.5263	1.0463	1.3164	0.2374	1.0389	1.0967
S =	0.0161	0.0346	0.0477	0.0126	0.0376	0.0784

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 # 23481 Fra
SDG # See Cover

VALIDATION FINDINGS WORSHEET
Continuing Calibration Results Verification

Reviewer: DV
2nd Reviewer: S

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	K4259	06/01/10	1,4-Dioxane (IS1)	0.5263	0.5448	0.5448	3.5	3.5
			Naphthalene (IS2)	1.0463	1.0762	1.0762	2.9	2.9
			Fluorene (IS3)	1.3164	1.3814	1.3814	4.9	4.9
			Hexachlorobenzene (IS4)	0.2374	0.2465	0.2465	3.9	3.8
			Chrysene (IS5)	1.0388	1.0705	1.0705	3.0	3.1
			Benzo(a)pyrene (IS6)	1.0967	1.1616	1.1616	5.9	5.9
2								

		CCV1		CCV2	
Compound (Reference IS)		Concentration (IS/Cpd)	Area Cpd	Area IS	Area Cpd	Area IS
1,4-Dioxane	(IS1)	40/80	270169	247945		
Naphthalene	(IS2)	40/80	2040112	947848		
Fluorene	(IS3)	40/80	1537267	556423		
Hexachlorobenzene	(IS4)	40/80	444880	902273		
Chrysene	(IS5)	40/80	2079022	971045		
Benzo(a)pyrene	(IS6)	40/80	1995187	858787		

LDC #: 23481F2a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Reviewer: JVG
2nd reviewer: [signature]

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	47.8	48	48	9
2-Fluorobiphenyl	↓	47.7	48	48	↓
Terphenyl-d14	↓	77.7	77	77	↓
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					

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 #: 23481 F29
SDG #: See Cover

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

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

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 780 - 16859/6-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	2630	NA	1800	NA	68	68				
Pentachlorophenol										
Pyrene	2630		1890		72	72				

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 #: 23481F29
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
Reviewer: JK
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. = $\frac{(72801)(40)(1ml)(1mg)(\quad)}{(887409)(0.2374)(30.9g)(0.717)(\quad)}$

= 487.6

≈ 490 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: May 18, 2010

LDC Report Date: July 9, 2010

Matrix: Soil

Parameters: Semivolatiles

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-3679-4

Sample Identification

SSAM6-04-2BPC
SSAM6-04-2BPCMS
SSAM6-04-2BPCMSD

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 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.

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

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 280-3679-4	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 280-3679-4

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-3679-4	SSAM6-04-2BPC	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 280-3679-4

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Semivolatiles - Field Blank Data Qualification Summary - SDG 280-3679-4

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23481H2a
SDG #: 280-3679-~~4~~ 4
Laboratory: Test America

Date: 7/28/10
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: 5/18/10
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	2 RSD ~
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	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: Soil

1	SSAM6-04-2BPC	11		21		31	
2	SSAM6-04-2BPCMS	12		22		32	
3	SSAM6-04-2BPCMSD	13		23		33	
4	MB 280-16859/5-A	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	

Tronox LLC Facility, PCS, Henderson, Nevada
Data Validation Reports
LDC #23481

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: July 9, 2010

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2400-8

Sample Identification

SSAM3-01-2BPC

**Indicates sample underwent Stage 4 review

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 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-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 for sample SSAM3-01-2BPC. Since the sample was diluted out, no data were qualified.

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. 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
SSAM3-01-2BPC	Methoxychlor	182.7	J (all detects)	A

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 280-2400-8	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 280-2400-8

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2400-8	SSAM3-01-2BPC	Methoxychlor	J (all detects)	A	Project Quantitation Limit (RPD) (dc)
280-2400-8	SSAM3-01-2BPC	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 280-2400-8

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG 280-2400-8

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 4

LDC #: 23481B3a
SDG #: 280-2400-8
Laboratory: Test America

Date: 7/09/10
Page: 1 of 1
Reviewer: VG
2nd Reviewer: J

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	%RSD r✓
IV.	Continuing calibration/ICV	A	cv/icv ≤20%
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	N	Client spec
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	~~A~~	
XII.	Compound quantitation and reported CRQLs	SW	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	N	
XV.	Field blanks	ND	FB = FB-04132010-RIG2-RZF (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: Soil

1	SSAM3-01-2BPC	11		21		31	
2	MB 280-12618/21-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 #: 23481 B79
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVG
2nd Reviewer: [illegible]

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 #: 23481 B24
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: MG
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. Chlordane
B. beta-BHC	J. 4,4'-DDE	R. Endrin aldehyde	Z. Aroclor-1248	HH. Chlordane (Technical)
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. 2,4'-DDD	KK.
F. Aldrin	N. Endosulfan sulfate	V. Aroclor-1016	DD. 2,4'-DDE	LL.
G. Heptachlor epoxide	O. 4,4'-DDT	W. Aroclor-1221	EE. 2,4'-DDT	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF. Hexachlorobenzene	NN.

Notes:_____

LDC #: 23481 #34
SDG #: Sw Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Spikes

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

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 (100x)	CLP1	A	369 (59-115)	No qual
				B	0 (63-124)	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	

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

LDC #: 23481 B3a
SDG #: Sea Cover

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

Reviewer: JVG
2nd Reviewer: [illegible]

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	1	182.7	J dets / A (dc)

Comments: See sample calculation verification worksheet for recalculations

LDC # 23481 B2c
SDG# Sm Cmv

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	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
X Coefficient(s)	5928.760416	0.444903		
Std Err of Coef.	36.118827	0.11		

LDC # 23481 B3a
SDG# Su Cmw

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JV
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 # 23481B36

SDG# see Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JVG

2nd Reviewer: [signature]

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 # 23481 B39
SDG# Su Core

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: M
2nd Reviewer: [signature]

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 # 23481B36
SDG# See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Calculation Verification

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

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	6/3/2010	Hexachlorobenzene CLP1	50	51.10	51.67	2.3	3.3
			4,4'-DDT CLP1	50	48.80	48.57	2.3	2.9
			Hexachlorobenzene CLP2	50	50.00	49.99	0.0	0.0
			4,4'-DDT CLP2	50	50.00	49.99	0.0	0.0
2								

Compound	a	b	c	CCV1 Area	CCV2 Area
HCB CLP1		8633.00		446078	
4,4'-DDT CLP1		5850.00		284109	
HCB CLP2	-13.727283	12623.43	8023.22	604834	
4,4'-DDT CLP2	-0.256471	7098.58	-2800.24293	351341	

LDC #: 27481 B3a
SDG #: su Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

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

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	0.20	0.73881	369	369	0
Decachlorobiphenyl	↓	↓	ND	0	0	0
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 #: 29481 B29

SDG #: Lu Conv

VALIDATION FINDINGS WORKSHEET

Laboratory Control Sample/Laboratory Control Sample Duplicate Results Verification

Reviewer: DVG

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 280-12618/22-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	16.4	NA	13.9	NA	85	85				
4,4'-DDT	↓	↓	13.4	↓	82	82				
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 #: 23481 B3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

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 FF

Conc. = $\frac{(20\,2796 - 5730.14)}{8594.6}$

= 22.929

final conc. = $\frac{(22.929)(10ml)(10)}{(30.1g)(0.885)}$

= 860.7 ug/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: July 9, 2010

Matrix: Water

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2836-2

Sample Identification

EB-04232010-RZE

Introduction

This data review covers one water sample 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 with the following exceptions:

Method Blank ID	Extraction Date	Compound	Concentration	Associated Samples
MB 280-13254/1-A	4/29/10	Hexachlorobenzene	0.0162 ug/L	All samples in SDG 280-2836-2

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

Sample EB-04232010-RZE was identified as an equipment blank. No chlorinated pesticide contaminants were found in this blank with the following exceptions:

Equipment Blank ID	Sampling Date	Compound	Concentration	Associated Samples
EB-04232010-RZE	4/23/10	4,4'-DDE 4,4'-DDT Dieldrin Hexachlorobenzene	0.17 ug/L 0.11 ug/L 0.015 ug/L 0.086 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 with the following exceptions:

LCS ID (Associated Samples)	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
LCS/D 280-13254/6-A (All samples in SDG 280-2836-2)	Toxaphene	127 (63-118)	129 (63-118)	-	J+ (all detects)	P

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 280-2836-2	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 280-2836-2

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2836-2	EB-04232010-RZE	Toxaphene	J+ (all detects)	P	Laboratory control samples (%R) (l)
280-2836-2	EB-04232010-RZE	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 280-2836-2

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Equipment Blank Data Qualification Summary - SDG 280-2836-2

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23481D3a
SDG #: 280-2836-2
Laboratory: Test America

Date: 7/08/10
Page: 1 of 1
Reviewer: CW
2nd Reviewer: g

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 1V
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 20 2.
V.	Blanks	SW	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	N	
VIII.	Laboratory control samples	SW	LCS 1
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	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	EB-04232010-RZE	11		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	

VALIDATION FINDINGS WORKSHEET

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

A. alpha-BHC	I. Dieldrin	Q. Endrin ketone	Y. Aroclor-1242	GG. Chlordane
B. beta-BHC	J. 4,4'-DDE	R. Endrin aldehyde	Z. Aroclor-1248	HH. Chlordane (Technical)
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. 2,4'-DDD	KK.
F. Aldrin	N. Endosulfan sulfate	V. Aroclor-1016	DD. 2,4'-DDE	LL.
G. Heptachlor epoxide	O. 4,4'-DDT	W. Aroclor-1221	EE. 2,4'-DDT	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF. Hexachlorobenzene	NN.

Notes:_____

LDC #: 23581D34
SDG #: Sw Conv

VALIDATION FINDINGS WORKSHEET
Blanks

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

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 all samples associated with a method blank?
Y N N/A Was a method blank performed for each matrix and whenever a sample extraction was performed?
Y N N/A If extract clean-up was performed, were extract clean-up blanks analyzed at the proper frequencies?
Y N N/A Was there contamination in the method blanks? If yes, please see the qualifications below.

Blank extraction date: 4/29/10 **Blank analysis date:** 5/11/10 **Associated samples:** All
Conc. units: ug/L

Compound	Blank ID	Sample Identification								
	MB 280-132524	1-A	1							
FF	0.016 Y		0.086							

2X
0.032

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

Compound	Blank ID	Sample Identification								

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
All contaminants within five times the method blank concentration were qualified as not detected, "U".

LDC #: 23481D39
SDG #: San Gabriel

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

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

Y N N/A Field blanks were 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: 4/23/10

Field blank type: (circle one) Field Blank / Rinsate / Other:_____ Associated Samples: None

Compound	Blank ID	Sample Identification								
	1									
J	0.17									
O	0.11									
I	0.015									
FF	0.086									
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										

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:

Samples with compound concentrations within five times the associated field blank concentration are listed above, these sample results were qualified as not detected, "U".

LDC #: 23481 D3a
SDG #: Sa Cm ✓

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples

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 laboratory control samples (LCS) and laboratory control sample duplicate (LCSD) analyzed for each matrix in this SDG?

Y (N) N/A Were the LCS percent recoveries (%R) and relative percent differences (RPD) within the QC limits?

Level IV/D Only

Y N (N/A) Was a LCS analyzed every 20 samples for each matrix or whenever a sample extraction was performed?

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		LCS/D 280-13754/6-A	U	127 (63-118)	129 (63-118)	( )	All	J+ dets/P (A)

(FF = not spiked)

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: April 26, 2010

LDC Report Date: July 9, 2010

Matrix: Water

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2879-2

Sample Identification

EB-04262010-1-RZD

Introduction

This data review covers one water sample 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 with the following exceptions:

Method Blank ID	Extraction Date	Compound	Concentration	Associated Samples
MB 280-13254/1-A	4/29/10	Hexachlorobenzene	0.0162 ug/L	All samples in SDG 280-2879-2

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

Sample EB-04262010-1-RZD was identified as an equipment 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.

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 with the following exceptions:

LCS ID (Associated Samples)	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Flag	A or P
LCS/D 280-13254/6-A (All samples in SDG 280-2879-2)	Toxaphene	127 (63-118)	129 (63-118)	-	J+ (all detects)	P

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 280-2879-2	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 280-2879-2

SDG	Sample	Compound	Flag	A or P	Reason (Code)
280-2879-2	EB-04262010-1-RZD	Toxaphene	J+ (all detects)	P	Laboratory control samples (%R) (l)
280-2879-2	EB-04262010-1-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 280-2879-2

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Chlorinated Pesticides - Equipment Blank Data Qualification Summary - SDG 280-2879-2

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23481E3a
SDG #: 280-2879-2
Laboratory: Test America

Date: 7/28/10
Page: 1 of 1
Reviewer: JVG
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 15%
IV.	Continuing calibration/ICV	A	CCV/ICV ≤20%
V.	Blanks	SW	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	N	client spec.
VIII.	Laboratory control samples	SW	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	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	EB-04262010-1-RZD	11		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	

VALIDATION FINDINGS WORKSHEET

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

A. alpha-BHC	I. Dieldrin	Q. Endrin ketone	Y. Aroclor-1242	GG. Chlordane
B. beta-BHC	J. 4,4'-DDE	R. Endrin aldehyde	Z. Aroclor-1248	HH. Chlordane (Technical)
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. 2,4'-DDD	KK.
F. Aldrin	N. Endosulfan sulfate	V. Aroclor-1016	DD. 2,4'-DDE	LL.
G. Heptachlor epoxide	O. 4,4'-DDT	W. Aroclor-1221	EE. 2,4'-DDT	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF. Hexachlorobenzene	NN.

Notes:_____

LDC #: 23481E3a
SDG #: La Cruz

VALIDATION FINDINGS WORKSHEET
Blanks

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

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 all samples associated with a method blank?
Y N N/A Was a method blank performed for each matrix and whenever a sample extraction was performed?
Y N N/A If extract clean-up was performed, were extract clean-up blanks analyzed at the proper frequencies?
Y N N/A Was there contamination in the method blanks? If yes, please see the qualifications below.

Blank extraction date: 4/29/10 **Blank analysis date:** 5/11/10 **Associated samples:** All (ND)
Conc. units: ug/L

Compound	Blank ID	Sample Identification								
	MB 280-13254/1-A									
FF	0.0167									

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

Compound	Blank ID	Sample Identification								

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
All contaminants within five times the method blank concentration were qualified as not detected, "U".

LDC #: 23481 E3a

SDG #: [illegible]

Reviewer: JVG

2nd Reviewer: [illegible]

VALIDATION FINDINGS WORKSHEET

Laboratory Control Samples

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 laboratory control samples (LCS) and laboratory control sample duplicate (LCSD) analyzed for each matrix in this SDG?

Y (N) N/A Were the LCS percent recoveries (%R) and relative percent differences (RPD) within the QC limits?

Level IV/D Only

Y N (N/A) Was a LCS analyzed every 20 samples for each matrix or whenever a sample extraction was performed?

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		LCS/D 280-13254/6-A	U	127 (63-118)	129 (63-118)	( )	All	J+dets/P (l)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

(FF not spiked)

Tronox LLC Facility, PCS, Henderson, Nevada
Data Validation Reports
LDC #23481

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: July 8, 2010

Matrix: Soil

Parameters: Manganese

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2216-11

Sample Identification

SA137-10BPC

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 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.

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

Method Blank ID	Analyte	Maximum Concentration	Associated Samples
PB (prep blank)	Manganese	0.0791 mg/Kg	All samples in SDG 280-2216-11

Sample concentrations were compared to concentrations detected in the method 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 manganese 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 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 280-2216-11	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
Manganese - Data Qualification Summary - SDG 280-2216-11

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2216-11	SA137-10BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Manganese - Laboratory Blank Data Qualification Summary - SDG 280-2216-11

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Manganese - Field Blank Data Qualification Summary - SDG 280-2216-11

No Sample Data Qualified in this SDG

LDC #: 23481A4
SDG #: 280-2216-11
Laboratory: Test America

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 4

Date: 7-8-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: W

METHOD: 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: 4/7/10
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	A	
XII.	Sample Result Verification	A	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	N	
XV	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: Soil

1	SA137-10BPC	11	PBS	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: _____

LDC #: 23481A4
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Page: 1 of 2
Reviewer: GR
2nd Reviewer: W

Method: Metals (EPA SW 846 Method 6010B/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. ICP/MS Tune				
Were all isotopes in the tuning solution mass resolution within 0.1 amu?	✓			
Were %RSD of isotopes in the tuning solution ≤5%?	✓			
III. Calibration				
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) QC limits?	✓			
Were all initial calibration correlation coefficients ≥ 0.995?	✓			
IV. 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.	✓			
V. ICP Interference Check Sample				
Were ICP interference check samples perfomed daily?	✓			
Were the AB solution percent recoveries (%R) with the 80-120% QC limits?	✓			
VI. 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.			✓	
VII. 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 #: 23481A4
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

Page: 2 of 2
Reviewer: SR
2nd Reviewer: [illegible]

Validation Area	Yes	No	NA	Findings/Comments
VIII. 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?			✓	
IX. ICP Serial Dilution				
Was an ICP serial dilution analyzed if analyte concentrations were > 50X the MDL (ICP)/>100X the MDL(ICP/MS)?	✓			
Were all percent differences (%Ds) < 10%?	✓			
Was there evidence of negative interference? If yes, professional judgement will be used to qualify the data.		✓		
X. Internal Standards (EPA SW 846 Method 6020/EPA 200.8)				
Were all the percent recoveries (%R) within the 30-120% (6020)/60-125% (200.8) of the intensity of the internal standard in the associated initial calibration?	✓			
If the %Rs were outside the criteria, was a reanalysis performed?	✓			
XI. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
XII. Sample Result Verification				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
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 analytes were detected in the field duplicates.			✓	
XV. Field blanks				
Field blanks were identified in this SDG.	✓			
Target analytes were detected in the field blanks.		✓		

LDC #: 23481A4
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 x 5xdil
Associated Samples: All

Analyte	Maximum PB[a] (mg/Kg)	Maximum PB[a] (ug/L)	Maximum ICB/CCB[a] (ug/L)	Action Limit	No Qualifiers									
Mn	0.0791													

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

LDC #: 23481A4
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Initial and Continuing Calibration Calculation Verification

Reviewer: QR
2nd Reviewer: L

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)	Mn	40.8	40.0	102	102	Y
CCV	ICP/MS (Continuing calibation)	↓	51.4	50.0	103	103	↓

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 #: 23481A4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

Page: 1 of 1
Reviewer: QR
2nd Reviewer:

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

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

$\%R = \frac{Found}{True} \times 100$ 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	Mn	101 ug/L	100 ug/L	101	101	Y
LCS	Laboratory control sample	↓	20.3	20.0	102	102	↓
	Matrix spike		(SSR-SR)				
	Duplicate						
1	ICP serial dilution	Mn	3299 ug/L	33555.5 ug/L	1.7	1.7	Y

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 #: 23481A4
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 Mn 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:

$$\frac{(100mL)(5)(3.299mg/L)}{0.899(1.12)} = 1638mg/kg$$

Sample ID	Analyte	Reported Concentration (mg/kg)	Calculated Concentration (mg/kg)	Acceptable (Y/N)
1	Mn	1600	1600	Y

RECALC.4S2

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: April 14, 2010

LDC Report Date: July 8, 2010

Matrix: Soil

Parameters: Manganese

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2448-16

Sample Identification

SA43-4BPC

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 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 manganese 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 manganese was found in these blanks with the following exceptions:

Equipment Blank ID	Sampling Date	Analyte	Concentration	Associated Samples
EB-04142010-RIG1-RZC	4/14/10	Manganese	1.6 ug/L	All samples in SDG 280-2448-16
EB-04142010-RIG2-RZC	4/14/10	Manganese	18 ug/L	All samples in SDG 280-2448-16

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 manganese 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 280-2448-16	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
Manganese - Data Qualification Summary - SDG 280-2448-16

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2448-16	SA43-4BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Manganese - Laboratory Blank Data Qualification Summary - SDG 280-2448-16

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Manganese - Equipment Blank Data Qualification Summary - SDG 280-2448-16

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Manganese - Field Blank Data Qualification Summary - SDG 280-2448-16

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23481C4
SDG #: 280-2448-16
Laboratory: Test America

Date: 7-8-10
Page: 1 of 1
Reviewer: R
2nd Reviewer: V

METHOD: 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: 4/14/10
II.	ICP/MS Tune	A	
III.	Calibration	A	
IV.	Blanks	A	
V.	ICP Interference Check Sample (ICS) Analysis	A	
VI.	Matrix Spike Analysis	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 = FB-04072010-RZC (280-22280-2), EB = EB-04142010-RIG1-RZC = EB-04142010-RIG2-RZC (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	SA43-4BPC	11	RBS	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:

LDC #: 23481C4
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: CR
2nd Reviewer: [illegible]

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?

Blank units: ug/L **Associated sample units:** mg/Kg Reason: be
Sampling date: 4/14/10 Soil factor applied 100x
Field blank type: (circle one) Field Blank / Rinsate / Other: EB Associated Samples: All

Analyte	Blank ID	Blank ID	Sample Identification									
	EB-04142010-RIG1-RZC (SDG#: 280-2448-2)	EB-04142010-RIG2-RZC (SDG#: 280-2448-2)	Action Level	No Qualifiers								
Mn	1.6	18	18									

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: April 23, 2010

LDC Report Date: July 8, 2010

Matrix: Water

Parameters: Metals

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2836-2

Sample Identification

EB-04232010-RZE
EB-04232010-RZEMS
EB-04232010-RZEMSD

Introduction

This data review covers 3 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, 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	0.0198 ug/L	All samples in SDG 280-2836-2

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-04232010-RZE	Cobalt	0.026 ug/L	1.0U ug/L

Sample EB-04232010-RZE 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-04232010-RZE	4/23/10	Cobalt Manganese	0.026 ug/L 1.2 ug/L	No associated samples in this SDG

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 280-2836-2	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 280-2836-2

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2836-2	EB-04232010-RZE	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 280-2836-2

SDG	Sample	Analyte	Modified Final Concentration	A or P	Code
280-2836-2	EB-04232010-RZE	Cobalt	1.0U ug/L	A	bl

Tronox LLC Facility, PCS, Henderson, Nevada
Metals - Equipment Blank Data Qualification Summary - SDG 280-2836-2

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23481D4
SDG #: 280-2836-2
Laboratory: Test America

Date: 7-8-10
Page: 1 of 1
Reviewer: R
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: 4/23/10
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	N	
XV	Field Blanks	SW	EB = 1 (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	EB-04232010-RZE	11	PBW	21		31	
2	EB-04232010-RZEMS	12		22		32	
3	EB-04232010-RZEMSD	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 #: 23481D4
SDG #: Seccaa02

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Reviewer: QR
2nd reviewer: MV

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1		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:23		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 #: 23481D4
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
PB/ICB/CCB QUALIFIED SAMPLES

Page: 1 of 1
Reviewer: CR
2nd Reviewer:

METHOD: Trace metals (EPA SW 864 Method 6010B/6020/7000)
Soil preparation factor applied: NA
Reason Code: bl
Sample Concentration units, unless otherwise noted: ug/L
Associated Samples: All

Analyte	Maximum PB[a] (mg/Kg)	Maximum PB[a] (ug/L)	Maximum ICB/CCB[a] (ug/L)	Action Limit	1									
Co			0.0198		0.026 / 1.0									

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

LDC #: 23481D4
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

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?

Reason Code: be

Blank units: ug/L **Associated sample units:** mg/Kg
Sampling date: ~~4/16/10~~ 4/23/10 Soil factor applied 100x
Field blank type: (circle one) Field Blank / Rinsate / Other: EB Associated Samples: none

Analyte	Blank ID	Sample Identification										
	1	Action Level										
Co	0.026											
Mn	1.2	1.2										

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: May 26, 2010

LDC Report Date: July 8, 2010

Matrix: Soil

Parameters: Manganese

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-3955-5

Sample Identification

SA44-3BPC
SA44-4BPC
SA180-3BPC
SA180-4BPC

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

Method Blank ID	Analyte	Maximum Concentration	Associated Samples
PB (prep blank)	Manganese	0.280 mg/Kg	All samples in SDG 280-3955-5
ICB/CCB	Manganese	1.37 ug/L	All samples in SDG 280-3955-5

Sample concentrations were compared to concentrations detected in the method 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 manganese 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

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 280-3955-5	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
Manganese - Data Qualification Summary - SDG 280-3955-5

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-3955-5	SA44-3BPC SA44-4BPC SA180-3BPC SA180-4BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (PQL) (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Manganese - Laboratory Blank Data Qualification Summary - SDG 280-3955-5

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Manganese - Field Blank Data Qualification Summary - SDG 280-3955-5

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23481I4
SDG #: 280-3955-5
Laboratory: Test America

Date: 7-8-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: [illegible]

METHOD: 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: 5/26/10
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 (SD6 #280-2216-10)
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	(SD6 #280-2216-10)
XII.	Sample Result Verification	N	
XIII.	Overall Assessment of Data	A	
XIV.	Field Duplicates	N	
XV	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: Soil

1	SA44-3BPC	11	PBS	21		31	
2	SA44-4BPC	12		22		32	
3	SA180-3BPC	13		23		33	
4	SA180-4BPC	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 #: 23481I4
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
PB/ICB/CCB QUALIFIED SAMPLES

METHOD: Trace metals (EPA SW 864 Method 6010B/6020/7000)
Soil preparation factor applied: 200x x 5xdil
Reason Code: bl
Sample Concentration units, unless otherwise noted: mg/Kg
Associated Samples: All

Analyte	Maximum PB[a] (mg/Kg)	Maximum PB[a] (ug/L)	Maximum ICB/CCB[a] (ug/L)	Action Limit	No Qualifiers									
Mn	0.280		1.37	2.8										

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

Tronox LLC Facility, PCS, Henderson, Nevada
Data Validation Reports
LDC #23481

Perchlorate

LDC

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: April 23, 2010

LDC Report Date: July 8, 2010

Matrix: Water

Parameters: Perchlorate

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-2836-2

Sample Identification

EB-04232010-RZE

Introduction

This data review covers one water sample 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-04232010-RZE was identified as an equipment blank. No perchlorate was 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 280-2836-2	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 280-2836-2

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-2836-2	EB-04232010-RZE	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 280-2836-2

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Equipment Blank Data Qualification Summary - SDG 280-2836-2

No Sample Data Qualified in this SDG

LDC #: 23481D6
SDG #: 280-2836-2
Laboratory: Test America

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

Date: 7-8-16
Page: 1 of 1
Reviewer: CR
2nd Reviewer:

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	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	EB=1 (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	EB-04232010-RZE	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: May 17, 2010

LDC Report Date: July 8, 2010

Matrix: Soil

Parameters: Perchlorate

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): 280-3624-6

Sample Identification

SSAM6-03-9BPC

Introduction

This data review covers one soil sample 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.

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

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 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 280-3624-6	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 280-3624-6

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
280-3624-6	SSAM6-03-9BPC	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 280-3624-6

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Perchlorate - Field Blank Data Qualification Summary - SDG 280-3624-6

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 4

LDC #: 23481G6
SDG #: 280-3624-6
Laboratory: Test America

Date: 7-8-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: ✓

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: 5/17/10
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	A	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	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: Soil

1	SSAM6-03-9BPC	11	PDS	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:

LDC #: 23481G6
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

Reviewer: CR
2nd Reviewer: W

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 and 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 #: 23548166
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

Reviewer: R
2nd Reviewer:

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 #: 23481G6
SDG #: see cover

Validatin Findings Worksheet
Initial and Continuing Calibration Calculation Verification

Reviewer: CR
2nd Reviewer: [illegible]

Method: Inorganics, Method 3140

The correlation coefficient (r) for the calibration of ClO4 was recalculated.Calibration date: 6/7/10

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	0.00284	*0.999314*	0.999358	Y
		s2	2.5	0.0077			
		s3	5	0.0154			
		s4	10	0.03108			
		s5	20	0.06039			
		s6	40	0.13055			
Calibration verification		ICV	20	19.006	95	—	
Calibration verification		CCV	30	30.547	102	—	
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 #: 23481G6
SDG #: seecover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

Reviewer: CR
2nd Reviewer:

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	ClO4	0.0948	0.0990	96	96	Y
N	Matrix spike sample		(SSR-SR)				
N	Duplicate sample						

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 #: 23468166
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
Reviewer: CP
2nd reviewer: LA

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 =

$y = 0.0032x - 0.0004$

Recalculation:

$$\frac{\left(\frac{0.04907 + 0.0004}{0.0032}\right)(100\,mL)(5000)}{(0.916)(9.9\,g)} = 850\,mg/kg$$

/1000

#	Sample ID	Analyte	Reported Concentration (mg/kg)	Calculated Concentration (mg/kg)	Acceptable (Y/N)
	1	ClO4	860	850	Y

Note: