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

August 11, 2008

SUBJECT: BRC Tronox Parcel G, Data Validation

Dear Ms. Barajas-Albalawi

Enclosed are the final validation reports for the fractions listed below. These SDGs were received on July 11, 2008. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 19097:

SDG #	Fraction
F8F120137, F8F120167	Volatiles, Semivolatiles, Chlorinated Pesticides, Polychlorinated Biphenyls, Metals, Wet Chemistry, Gasoline Range Organics, Diesel Range Organics, Polynuclear Aromatic Hydrocarbons, Dioxins/Dibenzofurans

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

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

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

Sincerely,

Erlinda T. Rauto
Operations Manager/Senior Chemist

9,064 Pages-CD

Attachment 1

80/20 EDD

LDC #19097 (ERM-Sacramento / BRC Tronox, Parcel G)

LDC	SDG#	DATE REC'D	(3) DATE DUE	VOA (8260B)		SVOA (8270C)		Pest. (8081A)		PCBs (8082)		Metals (SW846)		GRO (8015)		DRO (8015)		PAHs (8310)		Dioxins (8290)		Bromide Bromine Chlorate		Chloride Chlorine Fluoride		NO_3 NO_2 O-OP_4		SO_4 (300.0)		O&G (9071B 1664A)							
Matrix:	Water/Soil			W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S
A	F8F120137	07/11/08	08/01/08	2	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0						
B	F8F120167	07/11/08	08/01/08	1	2	0	2	0	2	0	2	0	2	0	3	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2						
B	F8F120167	07/11/08	08/01/08	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2						
Total	T/LR			3	4	1	4	1	4	1	4	1	4	1	5	1	4	1	4	1	4	1	4	1	4	1	4	1	4	1	4	0	0	0	0	0	73

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

19097ST.wpd

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

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 11, 2008

LDC Report Date: July 22, 2008

Matrix: Soil/Water

Parameters: Volatiles

Validation Level: EPA Level III & IV

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F120167

TSB-GJ-08-10
TSB-GJ-08-20**
TSB-GJ-08-30**
TSB-GJ-08-40
TB-1 6/11/08
TSB-GJ-08-10MS
TSB-GJ-08-10MSD

**Indicates sample underwent EPA Level IV review

Introduction

This data review covers 6 soil samples and one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8260B for Volatiles.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

Samples indicated by a double asterisk on the front cover underwent a EPA Level IV review. A EPA Level III review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Level III 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.

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

Percent relative standard deviations (%RSD) were less than or equal to 15.0% for each individual compound and less than or equal to 30.0% for calibration check compounds (CCCs).

In the case where %RSD was greater than 15.0%, the laboratory used a calibration curve to evaluate the compound. All coefficients of determination (r^2) were greater than or equal to 0.990 .

For the purposes of technical evaluation, all compounds were evaluated against the 30.0% (%RSD) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria.

Average relative response factors (RRF) for all volatile target compounds and system performance check compounds (SPCCs) were within method and validation criteria with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/9/08	Ethanol	0.00221 (≥0.05)	All soil samples in SDG F8F120167	J (all detects) UJ (all non-detects)	A

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).

For the purposes of technical evaluation, all compounds were evaluated against the 25.0% (%D) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria with the following exceptions:

Date	Compound	%D	Associated Samples	Flag	A or P
6/19/08 (LCAL0317)	Iodomethane	67.71684	All water samples in SDG F8F120167	J+ (all detects)	A

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

Date	Compound	%D	Associated Samples	Flag	A or P
5/28/08 (LICV9881)	Iodomethane	31.67513	All water samples in SDG F8F120167	J+ (all detects)	A
5/28/08 (LICV9881)	2-Hexanone	25.04476	All water samples in SDG F8F120167	J- (all detects) UJ (all non-detects)	A

All of the continuing calibration RRF values were within method and validation criteria with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/16/08	Ethanol	0.00209 (≥0.05)	All soil samples in SDG F8F120167	J (all detects) UJ (all non-detects)	A

V. Blanks

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

Sample TB-1 6/11/08 was identified as a trip blank. No volatile contaminants were found in this blank with the following exceptions:

Trip Blank ID	Sampling Date	Compound	Concentration	Associated Samples
TB-1 6/11/08	6/11/08	Acetone	1.1 ug/L	All soil samples in SDG F8F120167

Sample "RINSATE 1" (from SDG F8F120137) was identified as a rinsate. No volatile contaminants were found in this blank with the following exceptions:

Rinsate Blank ID	Sampling Date	Compound	Concentration	Associated Samples
RINSATE 1	6/11/08	Dichloromethane	3.3 ug/L	All soil samples in SDG F8F120167

Sample concentrations were compared to concentrations detected in the field blanks. The sample concentrations were either not detected or were significantly greater (>10X for common contaminants, >5X for other contaminants) than the concentrations found in the associated field blanks.

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
F8F200000-125	Bromofluorobenzene	117 (79-115)	All TCL compounds	J+ (all detects)	P

VII. Matrix Spike/Matrix Spike Duplicates

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

VIII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. Although the relative percent differences (RPD) for one compound and the percent recoveries for some compounds in the LCS/LCSD were not within QC limits, the LCSD and MS/MSD percent recoveries (%R) were within QC limits and no data were qualified.

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

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

XI. Target Compound Identifications

All target compound identifications were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

XII. Compound Quantitation and CRQLs

All compound quantitation and CRQLs were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

XIII. Tentatively Identified Compounds (TICs)

All tentatively identified compounds were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

XIV. System Performance

The system performance was acceptable for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

XV. Overall Assessment of Data

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

XVI. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel G
Volatiles - Data Qualification Summary - SDG F8F120167

SDG	Sample	Compound	Flag	A or P	Reason
F8F120167	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40	Ethanol	J (all detects) UJ (all non-detects)	A	Initial calibration (RRF)
F8F120167	TB-1 6/11/08	Iodomethane	J+ (all detects)	A	Continuing calibration (%D)
F8F120167	TB-1 6/11/08	Iodomethane	J+ (all detects)	A	Continuing calibration (ICV %D)
F8F120167	TB-1 6/11/08	2-Hexanone	J- (all detects) UJ (all non-detects)	A	Continuing calibration (ICV %D)
F8F120167	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40	Ethanol	J (all detects) UJ (all non-detects)	A	Continuing calibration (RRF)

BRC Tronox Parcel G
Volatiles - Laboratory Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Volatiles - Field Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

LDC #: 19097B1
SDG #: F8F120167
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III/IV

Date: 7/21/08
Page: 1 of 1
Reviewer: FT
2nd Reviewer: [illegible]

METHOD: GC/MS Volatiles (EPA SW 846 Method 8260B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/11/08
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	SW	% RSD, r^2 ≥ 0.990
IV.	Continuing calibration/ICV	SW	ICV ≤ 25
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	SW	Rinsate 2
VIII.	Laboratory control samples	SW	LCS/P
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	A	Not reviewed for Level III validation.
XII.	Compound quantitation/CRQLs	A	Not reviewed for Level III validation.
XIII.	Tentatively identified compounds (TICs)	A	Not reviewed for Level III validation.
XIV.	System performance	A	Not reviewed for Level III validation.
XV.	Overall assessment of data	A	
XVI.	Field duplicates	N	
XVII.	Field blanks	SW	TB = 5 R = Rinsate 1. SDG # F8F120137

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

Validated Samples: SOIL + Water ** Indicates sample underwent Level IV validation

1 1	TSB-GJ-08-10	11 1	F8F180000-29/	21 1	817029/	31	
2 1	TSB-GJ-08-20**	12	F8F200000-25	22 2	817225	32	
3	TSB-GJ-08-30**	13	F8F200000-36/	23 3	817236/	33	
4	TSB-GJ-08-40	14		24		34	
5 2	TB-1 6/11/08 W (8=Normal)	15		25		35	
6	TSB-GJ-08-10MS	16		26		36	
7	TSB-GJ-08-10MSD	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

LDC #: 19097B1
SDG #: per cover

VALIDATION FINDINGS CHECKLIST

Reviewer: FT
2nd Reviewer: [illegible]

Method: Volatiles (EPA SW 846 Method 8260B)

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 BFB performance results reviewed and found to be within the specified criteria?	✓			
Were all samples analyzed within the 12 hour clock criteria?	✓			
III. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Were all percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCCs and SPCCs?	✓			
Was a curve fit used for evaluation?	✓			
Did the initial calibration meet the curve fit acceptance criteria of > 0.990?	✓			
Were all percent relative standard deviations (%RSD) ≤ 30% and relative response factors (RRF) > 0.05?		✓		
IV. Continuing calibration				
Was a continuing calibration standard analyzed at least once every 12 hours for each instrument?	✓			
Were all percent differences (%D) and relative response factors (RRF) within method criteria for all CCCs and SPCCs?	✓			
Were all percent differences (%D) ≤ 25% and relative response factors (RRF) ≥ 0.05?		✓		
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed at least once every 12 hours 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 the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R outside of criteria?			✓	
VII. Matrix spike/Matrix spike duplicates				
Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.	✓			
Was a MS/MSD analyzed every 20 samples of each matrix?	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?		✓		
VIII. Laboratory control samples				
Was an LCS analyzed for this SDG?	✓			

LDC #: 19097B1
SDG #: all cover

VALIDATION FINDINGS CHECKLIST

Reviewer: EJ
2nd Reviewer: [signature]

Validation Area	Yes	No	NA	Findings/Comments
Was an LCS analyzed per analytical 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 of 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)?	✓			
XV. 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.	✓			

TARGET COMPOUND WORKSHEET

METHOD: VOA (EPA SW 846 Method 8260B)

A. Chloromethane*	U. 1,1,2-Trichloroethane	OO. 2,2-Dichloropropane	III. n-Butylbenzene	CCCC.1-Chlorohexane
B. Bromomethane	V. Benzene	PP. Bromochloromethane	JJJ. 1,2-Dichlorobenzene	DDDD. Isopropyl alcohol
C. Vinyl choride**	W. trans-1,3-Dichloropropene	QQ. 1,1-Dichloropropene	KKK. 1,2,4-Trichlorobenzene	EEEE. Acetonitrile
D. Chloroethane	X. Bromoform*	RR. Dibromomethane	LLL. Hexachlorobutadiene	FFFF. Acrolein
E. Methylene chloride	Y. 4-Methyl-2-pentanone	SS. 1,3-Dichloropropane	MMM. Naphthalene	GGGG. Acrylonitrile
F. Acetone	Z. 2-Hexanone	TT. 1,2-Dibromoethane	NNN. 1,2,3-Trichlorobenzene	HHHH. 1,4-Dioxane
G. Carbon disulfide	AA. Tetrachloroethene	UU. 1,1,1,2-Tetrachloroethane	OOO. 1,3,5-Trichlorobenzene	IIII. Isobutyl alcohol
H. 1,1-Dichloroethene**	BB. 1,1,2,2-Tetrachloroethane*	VV. Isopropylbenzene	PPP. trans-1,2-Dichloroethene	JJJJ. Methacrylonitrile
I. 1,1-Dichloroethane*	CC. Toluene**	WW. Bromobenzene	QQQ. cis-1,2-Dichloroethene	KKKK. Propionitrile
J. 1,2-Dichloroethene, total	DD. Chlorobenzene*	XX. 1,2,3-Trichloropropane	RRR. m,p-Xylenes	LLLL. Ethyl ether
K. Chloroform**	EE. Ethylbenzene**	YY. n-Propylbenzene	SSS. o-Xylene	MMMM. Benzyl chloride
L. 1,2-Dichloroethane	FF. Styrene	ZZ. 2-Chlorotoluene	TTT. 1,1,2-Trichloro-1,2,2-trifluoroethane	NNNN.
M. 2-Butanone	GG. Xylenes, total	AAA. 1,3,5-Trimethylbenzene	UUU. 1,2-Dichlorotetrafluoroethane	OOOO.
N. 1,1,1-Trichloroethane	HH. Vinyl acetate	BBB. 4-Chlorotoluene	VVV. 4-Ethyltoluene	PPPP.
O. Carbon tetrachloride	II. 2-Chloroethylvinyl ether	CCC. tert-Butylbenzene	WWW. Ethanol	QQQQ.
P. Bromodichloromethane	JJ. Dichlorodifluoromethane	DDD. 1,2,4-Trimethylbenzene	XXX. Di-isopropyl ether	RRRR.
Q. 1,2-Dichloropropane**	KK. Trichlorofluoromethane	EEE. sec-Butylbenzene	YYY. tert-Butanol	SSSS.
R. cis-1,3-Dichloropropene	LL. Methyl-tert-butyl ether	FFF. 1,3-Dichlorobenzene	ZZZ. tert-Butyl alcohol	TTTT.
S. Trichloroethene	MM. 1,2-Dibromo-3-chloropropane	GGG. p-Isopropyltoluene	AAAA. Ethyl tert-butyl ether	UUUU.
T. Dibromochloromethane	NN. Methyl ethyl ketone	HHH. 1,4-Dichlorobenzene	BBBB. tert-Amyl methyl ether	VVVV.

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

LDC #: 19077B1
SDG #: per cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration

Reviewer: RT
2nd Reviewer: R

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

X N N/A Did the laboratory perform a 5 point calibration prior to sample analysis?
Y N N/A Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's?
Y N N/A Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation?_____
Y N N/A Did the initial calibration meet the acceptance criteria?
Y N N/A Were all %RSDs and RRFs within the validation criteria of ≤30 %RSD and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %RSD (Limit: <30.0%)	Finding RRF (Limit: >0.05)	Associated Samples	Qualifications
	6/9/08	FKAL-BRC	www		0.00221	FBF180000-291 + All soils	J/UJ/A

LDC #: 19097B1
SDG #: see cover

Reviewer: [illegible]
2nd Reviewer: [illegible]

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

(Y) N N/A Was a continuing calibration standard analyzed at least once every 12 hours for each instrument?
(Y) N N/A Were percent differences (%D) and relative response factors (RRF) within method criteria for all CCC's and SPCC's ?
Y (N) N/A Were all %D and RRFs within the validation criteria of ≤25 %D and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %D (Limit: ≤25.0%)	Finding RRF (Limit: ≥0.05)	Associated Samples	Qualifications
+	5/28/08	LICV 9881	Iodomethane	31.67513		All water +	J+/A det
−			Z	25.04476		F8F200000-125	J-/UJ/A
+	6/19/08	LCAL 0317	Iodomethane	67.71684		↓	J+/A det
	6/16/08	FCAL1777BRC	WWW		0.00209	All soil +	J/UJ/A
						F8F180000-29	

LDC #: 19097B1 | **VALIDATION FINDINGS WORKSHEET** | Page: 1 of 1

SDG #: Lee Cores | **Field Blanks** | Reviewer: [illegible]

METHOD: GC/MS VOA (EPA SW846 Method 8260B) | 2nd Reviewer: [illegible]

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

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

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

Sampling date: 6/11/08

Field blank type: (circle one) Field Blank / Rinsate / Trip Blank / Other: TB Associated Samples: All soils (ND)

Compound	Blank ID	Sample Identification								
	5									
~~Methylene chloride~~										
Acetone	1.1									
~~Chloroform~~										
CRQL										

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
Common contaminants such as Methylene chloride, Acetone, 2-Butanone and Carbon disulfide that were detected in samples within ten times the associated field blank concentration were qualified as not detected, "U". Other contaminants within five times the field blank concentration were also qualified as not detected, "U".

VALIDATION FINDINGS WORKSHEET

Field Blanks

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

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

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

Field blank type: (circle one) Field Blank / Rinsate / Trip Blank / Other: R= Rinsate / Associated Samples: All soils (ND)

Compound	Blank ID R	Blank ID ___	Sample Identification							
[redacted]	6/11/08									
Dichloromethane ~~Methylene chloride~~	3.3									
Acetone										
Chloroform										
CRQL										

Blank units: ______ **Associated sample units:** ______

Field blank type: (circle one) Field Blank / Rinsate / Trip Blank / Other: ________ Associated Samples: ________

Compound	Blank ID ___	Blank ID ___	Sample Identification							
[redacted]										
Methylene chloride										
Acetone										
Chloroform										
CRQL										

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
Common contaminants such as Methylene chloride, Acetone, 2-Butanone and Carbon disulfide that were detected in samples within ten times the associated field blank concentration were qualified as not detected, "U". Other contaminants within five times the field blank concentration were also qualified as not detected, "U".

LDC #: 19097B1
SDG #: pre cones

VALIDATION FINDINGS WORKSHEET
Surrogate Spikes

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

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

Y N N/A Were all surrogate %R within QC limits?

Y N N/A If the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R out of outside of criteria?

#	Date	Sample ID	Surrogate	%Recovery (Limits)	Qualifications
		F8F200000-12S	BFB	117 (79-115)	J+/Pdet
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

	QC Limits (Soil)	QC Limits (Water)
SMC1 (TOL) = Toluene-d8	81-117	88-110
SMC2 (BFB) = Bromofluorobenzene	74-121	86-115
SMC3 (DCE) = 1,2-Dichloroethane-d4	80-120	80-120
SMC4 (DFM) = Dibromofluoromethane	80-120	86-118

LDC #: 19097B1
SDG #: pre cones

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD : GC/MS VOA (EPA SW 846 Method 8260B)

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

Y N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.

Y N N/A Was a MS/MSD analyzed every 20 samples of each matrix?

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		6 + 7	AA	( )	15 (33-150)	( )	# 1	no qual MS/D in
			HH	( )	( )	28 (20)	↓	↓ MS/D in
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
		Rinsate 2MS/D		( )	( )	22 (20)	none	no qual
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

	Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)
H.	1,1-Dichloroethene	59-172%	≤ 22%	61-145%	≤ 14%
S.	Trichloroethene	[illegible]	≤ 24%	71-120%	≤ 14%
V.	Benzene	[illegible]	≤ 21%	76-127%	≤ 11%
CC.	Toluene	[illegible]	≤ 21%	76-125%	≤ 13%
DD.	Chlorobenzene	[illegible]	≤ 21%	75-130%	≤ 13%

LDC #: [illegible]
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

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

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		8172125 LCS/D	Y	893 (42-140)	( )	112 (20)	All water +	no qual LCSD/n
			Iodomethane	166 (45-140)	181 (45-140)	( )	F8F20000-125	J/ MS/D/n
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC #: 19097B1
SDG #: all cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: F
2nd Reviewer: 9

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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
X = Mean of the RRFs

A_{is} = Area of associated internal standard
C_{is} = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Reported RRF (SV std)	Recalculated RRF (SV std)	Reported Average RRF (initial)	Recalculated Average RRF (initial)	Reported %RSD	Recalculated %RSD
1	ICAL-F	6/9/08	vinyl chloride (1st internal standard)	0.38029	0.38029	0.40678	0.40678	13.8779	13.29
			EE (2nd internal standard)	2.03630	2.0363	1.97703	1.97703	9.6757	9.6776
			JJJ (3rd internal standard)	1.42758	1.42758	1.42511	1.42511	5.17835	
2			(1st internal standard)						
			(2nd internal standard)						
			(3rd internal standard)						
3			(1st internal standard)						
			(2nd internal standard)						
			(3rd internal standard)						
4			(1st internal standard)						
			(2nd internal standard)						
			(3rd internal standard)						

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 #: 19097B7
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer: P
2nd Reviewer: 9

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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
$RRF = (A_x)(C_{is})/(A_{is})(C_x)$

Where: ave. RRF = initial calibration average RRF
RRF = continuing calibration RRF
A_x = Area of compound, A_{is} = Area of associated internal standard
C_x = Concentration of compound, C_{is} = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Reference internal Standard)	Average RRF (initial)	Reported RRF (CC)	Recalculated RRF (CC)	Reported %D	Recalculated %D
1	FCAL1778	6/16/08	C (1st internal standard)	0.40678	0.38255	0.38255	5.95695	5.95695
			EE (2nd internal standard)	1.97703	2.10886	2.10886	6.66813	6.66813
			JJJ (3rd internal standard)	1.425718	1.44262	1.44262	1.22825	1.22825
2	FCAL1777 BRC	6/16/08	2,2-Dimethylpentane (1st internal standard)	0.73871	0.72154	0.72154	2.32412	2.32412
			(2nd internal standard)					
			(3rd internal standard)					
3			(1st internal standard)					
			(2nd internal standard)					
			(3rd internal standard)					
4			(1st internal standard)					
			(2nd internal standard)					
			(3rd internal standard)					

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

LDC #: 19097B1
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Reviewer: FT
2nd reviewer: J

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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: 2

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Toluene-d8	50.0	46.9579	94	94	0
Bromofluorobenzene	↓	46.9877	94	94	↓
1,2-Dichloroethane-d4	↓	47.6177	95	95	↓
Dibromofluoromethane	↓	47.0909	94	94	↓

Sample ID:

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Toluene-d8					
Bromofluorobenzene					
1,2-Dichloroethane-d4					
Dibromofluoromethane					

Sample ID:

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Toluene-d8					
Bromofluorobenzene					
1,2-Dichloroethane-d4					
Dibromofluoromethane					

Sample ID:

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Toluene-d8					
Bromofluorobenzene					
1,2-Dichloroethane-d4					
Dibromofluoromethane					

Sample ID:

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Toluene-d8					
Bromofluorobenzene					
1,2-Dichloroethane-d4					
Dibromofluoromethane					

LDC #: 19097B1
SDG #: pw cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: FT
2nd Reviewer: [illegible]

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

% Recovery = 100 * (SSC - SC)/SA Where: SSC = Spiked sample concentration; SA = Spike added; SC = Sample concentration

RPD = I MSC - MSDC I * 2/(MSC + MSDC) MSC = Matrix spike percent recovery MSDC = Matrix spike duplicate percent recovery

MS/MSD sample: 6 + 7

Compound	Spike Added (ug/kg)		Sample Concentration (ug/kg)	Spiked Sample Concentration (ug/kg)		Matrix Spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	-----	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalculated
1,1-Dichloroethene	53.3	53.9		46.3	47.3	~~87~~	87	88	88	2.0	2.0
Trichloroethene				55.5	58.7	104	104	109	109	5.6	5.6
Benzene				49.7	50.8	93	93	94	94	2.2	2.2
Toluene				50.3	51.2	94	94	95	95	1.7	1.7
Chlorobenzene				49.7	51.3	93	93	95	95	3.2	3.2

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

LDC #: 19097B1
SDG #: per cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Sample Results Verification

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

% Recovery = 100 * SSC/SA Where: SSC = Spiked sample concentration
SA = Spike added

RPD = I LCS - LCSD I * 2/(LCS + LCSD) LCS = Laboraotry control sample percent recovery LCSD = Laboratory control sample duplicate percent recovery

LCS ID: 817029/-LCS

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	Recalculated
1,1-Dichloroethene	50	50 NA	47.8	NA	96	96				
Trichloroethene			49.5		99	99				
Benzene			49.6		99	99				
Toluene			50.2		100	100				
Chlorobenzene			49.9		100	100	NA			

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

LDC #: 19097B1
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

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)
RRF	=	Relative response factor of the calibration standard.
V_o	=	Volume or weight of sample pruged in milliliters (ml) or grams (g).
Df	=	Dilution factor.
%S	=	Percent solids, applicable to soils and solid matrices only.

Example:

Sample I.D. _____ , _____:

Conc. = ( ) ( ) ( ) / ( ) ( ) ( ) ( )

= ND

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

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 11, 2008

LDC Report Date: July 23, 2008

Matrix: Soil

Parameters: Semivolatiles

Validation Level: EPA Level III & IV

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F120167

Sample Identification

TSB-GJ-08-10
TSB-GJ-08-20**
TSB-GJ-08-30**
TSB-GJ-08-40
TSB-GJ-08-10MS
TSB-GJ-08-10MSD

**Indicates sample underwent EPA Level IV review

Introduction

This data review covers 6 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

Samples indicated by a double asterisk on the front cover underwent a EPA Level IV review. A EPA Level III review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Level III 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.

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 15.0% for each individual compound and less than or equal to 30.0% for calibration check compounds (CCCs).

In the case where %RSD was greater than 15.0%, the laboratory used a calibration curve to evaluate the compound. All coefficients of determination (r^2) were greater than or equal to 0.990 .

For the purposes of technical evaluation, all compounds were evaluated against the 30.0% (%RSD) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria.

Average relative response factors (RRF) for all semivolatile target compounds and system performance check compounds (SPCCs) were greater than or equal to 0.05 as required with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/18/08	Phthalic acid	0.01422 (≥0.05)	All samples in SDG F8F120167	J (all detects) UJ (all non-detects)	A
	n-(Hydroxymethyl)phthalimide	0.04408 (≥0.05)		J (all detects) UJ (all non-detects)	

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).

For the purposes of technical evaluation, all compounds were evaluated against the 25.0% (%D) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria with the following exceptions:

Date	Compound	%D	Associated Samples	Flag	A or P
6/19/08	Phthalic acid	25.06818	TSB-GJ-08-30** TSB-GJ-08-40	J- (all detects) UJ (all non-detects)	A

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

All of the continuing calibration RRF values were within method and validation criteria with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/18/08	Phthalic acid n-(Hydroxymethyl)phthalimide	0.01330 (≥0.05) 0.04331 (≥0.05)	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-10MS TSB-GJ-08-10MSD F8F160000-439	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A
6/19/08	Phthalic acid n-(Hydroxymethyl)phthalimide	0.01066 (≥0.05) 0.04523 (≥0.05)	TSB-GJ-08-30** TSB-GJ-08-40	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A

V. Blanks

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

Sample "RINSATE 1" (from SDG F8F120137) was identified as a rinsate. 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. Although the LCS percent recovery (%R) was not within QC limits for one compound, the MS/MSD percent recovery (%R) was within QC limits and no data were qualified.

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

All internal standard areas and retention times were within QC limits with the following exceptions:

Sample	Internal Standards	Area (Limits)	Compound	Flag	A or P
TSB-GJ-08-30**	1,4-Dichlorobenzene-d4 Perylene-d12 Naphthalene-d8 Acenaphthene-d10 Phenanthrene-d10 Chrysene-d12	53781 (82431-329724) 25394 (281395-1125580) 201776 (303781-1215124) 101990 (159543-638172) 150470 (271508-1086030) 72798 (268054-1072214)	All TCL compounds	J (all detects) UJ (all non-detects)	A
TSB-GJ-08-40	Perylene-d12	197078 (281395-1125580)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	A

XI. Target Compound Identifications

All target compound identifications were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

XII. Compound Quantitation and CRQLs

All compound quantitation and CRQLs were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

XIII. Tentatively Identified Compounds (TICs)

All tentatively identified compounds were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

XIV. System Performance

The system performance was acceptable for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

XV. Overall Assessment of Data

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

XVI. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel G
Semivolatiles - Data Qualification Summary - SDG F8F120167

SDG	Sample	Compound	Flag	A or P	Reason
F8F120167	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40	Phthalic acid n-(Hydroxymethyl)phthalimide	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A	Initial calibration (RRF)
F8F120167	TSB-GJ-08-30** TSB-GJ-08-40	Phthalic acid	J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D)
F8F120167	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40	Phthalic acid n-(Hydroxymethyl)phthalimide	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A	Continuing calibration (RRF)
F8F120167	TSB-GJ-08-30**	All TCL compounds	J (all detects) UJ (all non-detects)	A	Internal standards (area)
F8F120167	TSB-GJ-08-40	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	A	Internal standards (area)

BRC Tronox Parcel G
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Semivolatiles - Field Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

LDC #: 19097B2
SDG #: F8F120167
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III/IV

Date: 7/21/08
Page: 1 of 1
Reviewer: [illegible]
2nd Reviewer: [illegible]

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: 6/11/08
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	SW	%RSD, r^2 ≥ 0.990
IV.	Continuing calibration/ICV	SW	
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	A	
VIII.	Laboratory control samples	SW	LCS
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	SW	
XI.	Target compound identification	A	Not reviewed for Level III validation.
XII.	Compound quantitation/CRQLs	A	Not reviewed for Level III validation.
XIII.	Tentatively identified compounds (TICs)	~~A~~	Not reviewed for Level III validation.
XIV.	System performance	A	Not reviewed for Level III validation.
XV.	Overall assessment of data	A	
XVI.	Field duplicates	N	
XVII.	Field blanks	ND	R = Rinsate / SDG F8F120137

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: ** Indicates sample underwent Level IV validation

1	TSB-GJ-08-10 (SOIL)	11		21		31	
2	TSB-GJ-08-20**	12		22		32	
3	TSB-GJ-08-30**	13		23		33	
4	TSB-GJ-08-40	14		24		34	
5	TSB-GJ-08-10MS	15		25		35	
6	TSB-GJ-08-10MSD	16		26		36	
7	F8F160000-439	17	8168439	27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

LDC #: 19097B2
SDG #: per cover

VALIDATION FINDINGS CHECKLIST

Reviewer: EJ
2nd Reviewer: g

Method: Semivolatiles (EPA SW 846 Method 8270C)

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

LDC #: 19097B2
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Reviewer: [illegible]
2nd Reviewer: [illegible]

Validation Area	Yes	No	NA	Findings/Comments
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?			✓	
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?			✓	
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
X. Internal Standards				
Were internal standard area counts within -50% or +100% of the associated calibration standard?		✓		
Were retention times within + 30 seconds from the associated calibration standard?	✓			
XI. Target Compound Identification				
Were relative retention times (RRT's) within + 0.06 RRT units of the standard?			✓	
Did compound spectra meet specified EPA "Functional Guidelines" criteria?			✓	
Were chromatogram peaks verified and accounted for?	✓			
XII. Compound Quantitation and 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 RRY

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

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 #: 19097B2
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration

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

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

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

Y N N/A Did the laboratory conduct an acceptable 5 point calibration prior to sample analysis?
Y N N/A Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's?
Y N N/A Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation?_____
Y N N/A Did the initial calibration meet the acceptance criteria?
Y N N/A Were all %RSDs and RRFs within the validation criteria of ≤30 %RSD and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %RSD (Limit: ≤30.0%)	Finding RRF (Limit: ≥0.05)	Associated Samples	Qualifications
	6/18/08	JICAL.SPEC	Phthalic Acid		0.01422	All +BLK	J/UJ/A
			N-(Hydroxymethyl) phthalimide		0.04408	↓	↓

INICAL_2S

LDC #: 19097B2
SDG #: Re cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: 9
2nd Reviewer: 2

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

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

Y N N/A Was a continuing calibration standard analyzed at least once every 12 hours of sample analysis for each instrument?
Y N N/A Were percent differences (%D) and relative response factors (RRF) within method criteria for all CCC's and SPCC's ?
Y N N/A Were all %D and RRFs within the validation criteria of ≤25 %D and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %D (Limit: <25.0%)	Finding RRF (Limit: >0.05)	Associated Samples	Qualifications
	6/18/08	JCAL5197	Phthalic Acid	0.01330		F8F160000-439, 1, 2, 5, 6	J/UJ/A
			N-(Hydroxymethyl) phthalimide	0.04331	→	↓	↓
	6/19/08	JCAL5229	↓		0.01066	3, 4	J/UJ/A
					0.04523	↓	↓
—			Phthalic Acid	25.06818			J-/UJ A

CONCAL.2S

LDC #: [illegible]
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

Reviewer: [illegible]
2nd Reviewer: [illegible]

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

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

(Y) N N/A Was a LCS required?

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

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		8168439-LCS	HH	19 (54-90)	( )	( )	All + Blk	~~J/UJ/P~~
				( )	( )	( )		no qual MS/Dir
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
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				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC #: 19097B2
SDG #: fc cover

VALIDATION FINDINGS WORKSHEET
Internal Standards

Page: 1 of 1
Reviewer: M
2nd Reviewer: e

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

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

Y (N) N/A Were all internal standard area counts within -50 to +100 of the associated calibration standard?

Y N N/A Were the retention times of the internal standards within +/- 30 seconds of the retention times of the associated calibration standard?

#	Date	Sample ID	Internal Standard	Area (Limits)	RT (Limits)	Qualifications
		3	DCB	53781 (82431 - 329724)		J/UJ/A QUAL ALL TCL
			PRY	~~197078~~ 25394 (281395 - 1125580)		
			NPT	201776 (303781 - 1215124)		
			ANT	101990 (159543 - 638172)		
			PHN	150470 (271508 - 1086030)		↓
			CRY	72798 (268054 - 1072214)		
		X				
		4	PRY	197078 (281395 - 1125580)		J/UJ/A QUAL

* QC limits are advisory

IS1 (DCB) = 1,4-Dichlorobenzene-d4
IS2 (NPT) = Naphthalene-d8
IS3 (ANT) = Acenaphthene-d10
IS4 (PHN) = Phenanthrene-d10
IS5 (CRY) = Chrysene-d12
IS6 (PRY) = Perylene-d12

LDC #: 19097B2
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

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

METHOD: GC/MS BNA (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 (Reference Internal Standard)	Reported RRF (50 std)	Recalculated RRF (50 std)	Reported Average RRF (initial)	Recalculated Average RRF (initial)	Reported %RSD	Recalculated %RSD
1	ICAL - J	6/2/08	Phenol (1st internal standard)	1.87853	1.87853	1.85537	1.85537	1.070	1.070
			Naphthalene (2nd internal standard)	1.09438	1.09438	1.10901	1.10901	1.328	1.328
			Fluorene (3rd internal standard)	1.41778	1.41778	1.41229	1.41229	0.573	0.573
			Pentachlorophenol (4th internal standard)	0.20260	0.20260	0.19634	0.19634	10.255	10.255
			Bis(2-ethylhexyl)phthalate (5th internal standard)	0.90763	0.90763	0.86343	0.86343	9.524	9.524
			Benzo(a)pyrene (6th internal standard)	1.13808	1.13808	1.11182	1.11182	6.486	6.486
2	ICAL-J APPX	6/18/08	Acetophenone	0.51976	0.51976	0.51274	0.51274	0.71511	0.71511
			~~Phenol (1st~~ 2nd internal standard)						
			Naphthalene (2nd internal standard)						
			Fluorene (3rd internal standard)						
			Pentachlorophenol (4th internal standard)						
			Bis(2-ethylhexyl)phthalate (5th internal standard)						
			Benzo(a)pyrene (6th internal standard)						
3	ICAL-J SPIKE		N-(hydroxymethyl)phthalimide	0.04162		0.04408		8.41339	
			Phenol (1st internal standard)						
			Naphthalene (2nd internal standard)						
			Fluorene (3rd internal standard)						
			Pentachlorophenol (4th internal standard)						
			Bis(2-ethylhexyl)phthalate (5th internal standard)						
			Benzo(a)pyrene (6th internal standard)						

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 #: 19097B2
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Page: 1 of 1
Reviewer: PT
2nd Reviewer: S

METHOD: GC/MS BNA (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
$RRF = (A_x)(C_{is})/(A_{is})(C_x)$

Where: ave. RRF = initial calibration average RRF
RRF = continuing calibration RRF
A_x = Area of compound, A_{is} = Area of associated internal standard
C_x = Concentration of compound, C_{is} = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Average RRF (initial)	Reported RRF (CC)	Recalculated RRF (CC)	Reported %D	Recalculated %D
1	JCAL5195	6/18/08	Phenol (1st internal standard)	1.85537	1.87174	1.8717	0.88210	0.8821
			Naphthalene (2nd internal standard)	1.10901	1.10135	1.101	0.69070	0.6907
			Fluorene (3rd internal standard)	1.41229	1.39801	1.398	1.01058	1.0106
			Pentachlorophenol (4th internal standard)	0.19634	0.20370	0.2037	3.74980	3.749
			Bis(2-ethylhexyl)phthalate (5th internal standard)	0.86343	0.87088	0.879	0.86222	0.8622
			Benzo(a)pyrene (6th internal standard)	1.11182	1.11507	1.1151	0.29280	0.2928
2	JCAL5196	6/18/08	Acetophenone Phenol (1st internal standard)	0.51274	0.52185	0.52185	1.77632	1.77632
			Naphthalene (2nd internal standard)					
			Fluorene (3rd internal standard)					
	JCAL5197	6/18/08	N-(Hydroxymethyl) phthalimide Pentachlorophenol (4th internal standard)	0.04408	0.04331	0.04331	1.73819	1.73819
			Bis(2-ethylhexyl)phthalate (5th internal standard)					
			Benzo(a)pyrene (6th internal standard)					
3			Phenol (1st internal standard)					
			Naphthalene (2nd internal standard)					
			Fluorene (3rd internal standard)					
			Pentachlorophenol (4th internal standard)					
			Bis(2-ethylhexyl)phthalate (5th internal standard)					
			Benzo(a)pyrene (6th internal standard)					

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

LDC #: 19097B2
SDG #: fee cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer: A
2nd Reviewer: R

METHOD: GC/MS BNA (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 = $(A_x)(C_{is})/(A_{is})(C_x)$

Where: ave. RRF = initial calibration average RRF
RRF = continuing calibration RRF
A_x = Area of compound, A_{is} = Area of associated internal standard
C_x = Concentration of compound, C_{is} = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Average RRF (initial)	Reported RRF (CC)	Recalculated RRF (CC)	Reported %D	Recalculated %D
1	JCA L5227	6/19/08	Phenol (1st internal standard)	1.85537	1.80162	1.8016	2.89721	2.897
			Naphthalene (2nd internal standard)	1.10901	1.08712	1.087	1.97399	1.974
			Fluorene (3rd internal standard)	1.41229	1.40878	1.4088	0.24855	0.2486
			Pentachlorophenol (4th internal standard)	0.19634	0.20730	0.2073	5.58529	5.585
			Bis(2-ethylhexyl)phthalate (5th internal standard)	0.86343	0.87188	0.8719	0.97842	0.978
			Benzo(a)pyrene (6th internal standard)	1.11182	1.12694	1.1269	1.36062	1.361
2	JCAL5228	6/19/08	Acetophenone ~~Phenol~~ (1st internal standard)	0.51274	0.51326	0.5133	0.10062	0.1006
			Naphthalene (2nd internal standard)					
	JCAL5229	6/19/08	N-(Hydroxymethyl) phthalimide ~~Fluorene~~ (3rd internal standard)	0.04408	0.04523	0.0452	2.61460	2.613
			Pentachlorophenol (4th internal standard)					
			Bis(2-ethylhexyl)phthalate (5th internal standard)					
			Benzo(a)pyrene (6th internal standard)					
3			Phenol (1st internal standard)					
			Naphthalene (2nd internal standard)					
			Fluorene (3rd internal standard)					
			Pentachlorophenol (4th internal standard)					
			Bis(2-ethylhexyl)phthalate (5th internal standard)					
			Benzo(a)pyrene (6th internal standard)					

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

LDC #: 19097B2
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Page: 1 of 1
Reviewer: B
2nd reviewer: A

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: #2

	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Nitrobenzene-d5	50	33.3103	67	67	0
2-Fluorobiphenyl	↓	34.9043	70	70	
Terphenyl-d14	↓	33.6734	67	67	
Phenol-d5	75	48.9853	65	65	↓
2-Fluorophenol	↓	48.52	65	65	
2,4,6-Tribromophenol	↓	50.6613	68	68	
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 #: 19097B2
SDG #: pw cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: [illegible]
2nd Reviewer: [illegible]

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

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

% Recovery = 100 * (SSC - SC)/SA Where: SSC = Spiked sample concentration; SA = Spike added; SC = Sample concentation

RPD = | MS - MSD | * 2/(MS + MSD) MS = Matrix spike percent recovery; MSD = Matrix spike duplicate percent recovery

MS/MSD samples: 5 + 6

Compound	Spike Added (ug/kg)		Sample Concentration (ug/kg)	Spiked Sample Concentration (ug/kg)		Matrix Spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	------	MS	MSD	Reported	Recalc	Reported	Recalc	Reported	Recalculated
Phenol	3570	2630	NP	2490	2450	70	70	69	69	1.7	1.7
N-Nitroso-di-n-propylamine				2730	2670	77	77	75	75	2.2	2.2
4-Chloro-3-methylphenol				2760	2690	77	77	75	75	2.8	2.8
Acenaphthene				2640	2620	74	74	73	73	1.0	1.0
Pentachlorophenol				2300	2230	64	64	62	62	3.0	3.0
Pyrene				2460	2390	69	69	67	67	2.7	2.7

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

LDC #: 19097B2
SDG #: see cover

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

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

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

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

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

RPD = I LCS - LCSD I * 2/(LCS + LCSD) LCS = Laboratory control sample percent recovery LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: 8168439-LCS

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	3330	NA	2360	NA	71	71				
N-Nitroso-di-n-propylamine			2570		77	77				
4-Chloro-3-methylphenol			2560		77	77				
Acenaphthene			2510		75	75				
Pentachlorophenol			2240		67	67				
Pyrene			2350		70	70				

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 #: 19097B2
SDG #: pre cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer:
2nd reviewer:

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. _____, _____:

Conc. = $\frac{(\quad)(\quad)(\quad)(\quad)(\quad)(\quad)}{(\quad)(\quad)(\quad)(\quad)(\quad)(\quad)}$

= ND

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

LDC Report# 19097B3a

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 11, 2008

LDC Report Date: August 11, 2008

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: EPA Level III & IV

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F120167

Sample Identification

TSB-GJ-08-10
TSB-GJ-08-20**
TSB-GJ-08-30**
TSB-GJ-08-40
TSB-GJ-08-10MS
TSB-GJ-08-10MSD

**Indicates sample underwent EPA Level IV review

Introduction

This data review covers 6 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8081A for Chlorinated Pesticides.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Samples indicated by a double asterisk on the front cover underwent a EPA Level IV review. A EPA Level III review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Level III 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.

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 and multicomponent compounds was 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 all compounds.

Retention time windows were evaluated and considered technically acceptable for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples on which a Level III 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 15.0% QC limits.

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

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

Retention times (RT) of all compounds in the calibration standards were within QC limits for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples on which a Level III review was performed.

V. Blanks

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

Sample "RINSATE 1" (from SDG F8F120137) was identified as a rinsate. 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

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. 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 an EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

XII. Compound Quantitation and Reported CRQLs

All compound quantitation and CRQLs were within validation criteria for samples on which an EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III 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.

BRC Tronox Parcel G
Chlorinated Pesticides - Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

LDC #: 19097B3a
SDG #: F8F120167
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III/IV

Date: 7/21/08
Page: 1 of 1
Reviewer:
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: 6/11/08
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	SW	ICV ≤ 15
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	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	A	Not reviewed for Level III validation.
XII.	Compound quantitation and reported CRQLs	A	Not reviewed for Level III validation.
XIII.	Overall assessment of data	N	
XIV.	Field duplicates	N	
XV.	Field blanks	ND	R = Rinsate / SDG # F8F120137

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: ** Indicates sample underwent Level IV validation

SOIL

1	TSB-GJ-08-10	11		21		31	
2	TSB-GJ-08-20**	12		22		32	
3	TSB-GJ-08-30**	13		23		33	
4	TSB-GJ-08-40	14		24		34	
5	TSB-GJ-08-10MS	15		25		35	
6	TSB-GJ-08-10MSD	16		26		36	
7	F8F160000-164	17	8168164	27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

LDC #: 19097B3a
SDG #: pu cones

VALIDATION FINDINGS CHECKLIST

Page: 1 of 2
Reviewer: FR
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) $\leq$ 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 $\leq$ 15%.0 for individual breakdown in the Evaluation mix standards?	✓			
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) $\leq$ 15%.0 or percent recovieries 85-115%?		✓		
Were all the retention times within the acceptance windows?	✓			
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed for each matrix and concentration?	✓			
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?			✓	

LDC #: 19097B3a
SDG #: all cores

VALIDATION FINDINGS CHECKLIST

Reviewer:
2nd Reviewer:

Validation Area	Yes	No	NA	Findings/Comments
VII. Matrix spike/Matrix spike duplicates				
Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.	✓			
Was a MS/MSD analyzed every 20 samples of each matrix?	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?	✓			
VIII. Laboratory control samples				
Was an LCS analyzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?	✓			
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?			✓	
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
X. Target compound identification				
Were the retention times of reported detects within the RT windows?			✓	
XI. Compound quantitation/CRQLs				
Were compound quantitation and CRQLs adjusted to reflect all sample dilutions, dry weight factors, and clean-up activities applicable to level IV validation?	✓			
XII. System performance				
System performance was found to be acceptable.	✓			
XIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
XIV. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target compounds were detected in the field duplicates.			✓	
XV. Field blanks				
Field blanks were identified in this SDG.	✓			
Target compounds were detected in the field blanks.		✓		

VALIDATION FINDINGS WORKSHEET

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

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

Notes:_____

LDC #: 1909713 3c
SDG #: all cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: GC ___ HPLC ___

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

CF = A/C
average CF = sum of the CF/number of standards
%RSD = 100 * (S/X)

A = Area of compound,
C = Concentration of compound,
S = Standard deviation of the CF
X = Mean of the CFs

#	Standard ID	Calibration Date	Compound	Reported CF (0.025 std)	Recalculated CF (0.025 std)	Reported Average CF (initial)	Recalculated Average CF (initial)	Reported %RSD	Recalculated %RSD
1	ICAL	6/16/08	endosulfan I ch D (B)	285001720	285001720	273533412	273533412	2.96584	2.96
			methoxychlor	44217640	44217640	42222360	42222360	6.01863	6.02
2	ICAL	6/16/08	ch e (A)	530216040	530216040	510995140	510995140	3.14887	3.14887
			↓	161496680	161496680	152272620	152272620	6.25515	6.25515
3									
4									

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 #: 19097B3a
SDG #: per cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer: P
2nd Reviewer: 2

METHOD: GC_____HPLC_____

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

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

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

#	Standard ID	Calibration Date	Compound	Average CF(Ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %D	Recalculated %D
1	KCAL064	6/18/08	endosulfan I (4 A	0.0250	0.0259	0.0259	3.7	3.7
			methoxychlor	↓	0.0252	0.0252	0.8	0.8
2	KCAL080	6/18/08	↓	↓	0.0252	0.0252	1.0	1.0
					0.0257	0.0257	2.7	2.7
3								
4								

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

LDC #: 19097B3a
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Reviewer: [illegible]
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: #2

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	
Tetrachloro-m-xylene						
Tetrachloro-m-xylene	ch A	0.02	001676	84	84	0
Decachlorobiphenyl	↓	↓	0.01750	87	87	↓
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 #: 19097B3a
SDG #: per cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: 1
2nd Reviewer: 2

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

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

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

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

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

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

MS/MSD samples: 5 + 6

Compound	Spike Added (ug/kg)		Sample Concentration (ug/kg)	Spiked Sample Concentration ( )		Matrix Spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	-	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalculated
gamma-BHC	17.7	17.5	NO	15.6	15.3	88	88	87	87	2.0	2.0
4,4'-DDT	↓	↓		15.6	16.3	88	88	93	93	4.4	4.4

Comments: Refer ot Matrix Spike/Matrix Spike Duplicates findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 19097B3a
SDG #: all cover

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

Reviewer: [illegible]
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: 8168164- lcs

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	16.7	NA	15.0	NA	90	90				
4,4'-DDT	↓	↓	16.8	↓	101	101	NA			

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 #: 19097B3a
SDG #: pu cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
Reviewer:
2nd reviewer:

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

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

Example:

Sample I.D. _____ _____:

Conc. = $\frac{(\quad)}{(\quad)}$

=

ND

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

Note: _____

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 11, 2008

LDC Report Date: July 22, 2008

Matrix: Soil

Parameters: Polychlorinated Biphenyls

Validation Level: EPA Level III & IV

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F120167

Sample Identification

TSB-GJ-08-10
TSB-GJ-08-20**
TSB-GJ-08-30**
TSB-GJ-08-40
TSB-GJ-08-10MS
TSB-GJ-08-10MSD

**Indicates sample underwent EPA Level IV review

Introduction

This data review covers 6 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8082 for Polychlorinated Biphenyls.

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

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Samples indicated by a double asterisk on the front cover underwent a EPA Level IV review. A EPA Level III review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Level III 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.

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 multicomponent compounds was performed for the primary (quantitation) column as required by the method.

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

Retention time windows were evaluated and considered technically acceptable for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples on which a Level III 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 15.0% QC limits.

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

Retention times (RT) of all compounds in the calibration standards were within QC limits for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples on which a Level III review was performed.

V. Blanks

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

Sample "RINSATE 1" (from SDG F8F120137) was identified as a rinsate. No polychlorinated biphenyl 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. 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 EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

XII. Compound Quantitation and Reported CRQLs

All compound quantitation and CRQLs were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III 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.

BRC Tronox Parcel G
Polychlorinated Biphenyls - Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Polychlorinated Biphenyls - Laboratory Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Polychlorinated Biphenyls - Field Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

LDC #: 19097B3b
SDG #: F8F120167
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III/IV

Date: 7/21/08
Page: 1 of 1
Reviewer:
2nd Reviewer:

METHOD: GC Polychlorinated Biphenyls (EPA SW 846 Method 8082)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/11/08
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	ICV ≤ 15
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	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	A	Not reviewed for Level III validation.
XII.	Compound quantitation and reported CRQLs	A	Not reviewed for Level III validation.
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	A	
XV.	Field blanks	ND	R= Rinsate / SDG # F8F120137

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: ** Indicates sample underwent Level IV validation

30/L

1	TSB-GJ-08-10	11		21		31	
2	TSB-GJ-08-20**	12		22		32	
3	TSB-GJ-08-30**	13		23		33	
4	TSB-GJ-08-40	14		24		34	
5	TSB-GJ-08-10MS	15		25		35	
6	TSB-GJ-08-10MSD	16		26		36	
7	F8F160000-162	17	8168162	27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

LDC #: 19097B36
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

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

Method: ✓ GC _____ HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
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?	✓			
IV. Continuing calibration				
What type of continuing calibration calculation was performed? ____%D or ____%R	✓			
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 15%.0 or percent recoveries 85-115%?	✓			
Were all the retention times within the acceptance windows?	✓			
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed for each matrix and concentration?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
VI. Surrogate spikes				
Were all surrogate %R within the QC limits?	✓			
If the percent recovery (%R) 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				
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?	✓			

LDC #: 19097B36
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Reviewer:
2nd Reviewer:

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

LDC #: 19097B3b
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: GC ✓ HPLC ____

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

CF = A/C
average CF = sum of the CF/number of standards
%RSD = 100 * (S/X)

A = Area of compound,
C = Concentration of compound,
S = Standard deviation of the CF
X = Mean of the CFs

#	Standard ID	Calibration Date	Compound	Reported CF (5000std)	Recalculated CF (5000std)	Reported Average CF (initial)	Recalculated Average CF (initial)	Reported %RSD	Recalculated %RSD
1	ICAL	5/21/08	1260-1 ch A	28576	28576	27977	27977	12.0	12.0
			1260-1 ch B	39248	39248	39164	39164	9.582	9.582
2									
3									
4									

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 #: 19097B36
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Page: 1 of 1
Reviewer:
2nd Reviewer:

METHOD: GC ✓ HPLC ____

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

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

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

#	Standard ID	Calibration Date	Compound	Average CF(Ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %D	Recalculated %D
1	PCAL089	6/18/08	Aroclor 1260	10000	952.1902	952.19	4.8	4.8
2	PCAL100	6/18/08	↓	↓	937.3342	937.33	6.3	6.3
3								
4								

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

LDC #: 19097B26
SDG #: pet cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Reviewer: P
2nd reviewer: R

METHOD: ✓ GC __ HPLC

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: #2

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	
DCB	ch A	20	16.0769	80	80	0

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	

LDC #: 19097B36
SDG #: pw cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: ✓ GC __ HPLC

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

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

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

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

MS/MSD samples: 5 + 6

Compound	Spike Added (ug/kg)		Sample Conc. (ug/kg)	Spike Sample Concentration (ug/kg)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	---	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											
Aroclor 1260	177	178	ND	181	194	102	102	109	109	7.4	7.4

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

LDC #: 19097B36
SDG #: pw cover

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

Reviewer: P
2nd Reviewer: R

_____METHOD: ✓ GC __HPLC

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

RPD =(({SSCLCS - SSCLCSD} * 2) / (SSCLCS + SSCLCSD))*100 LCS = Laboratory Control Sample percent recovery LCSD = Laboratory Control Sample duplicate percent recovery

LCS/LCSD samples: 8168162 - LCS

Compound	Spike Added (ug/kg)		Sample Conc. (ug/kg)	Spike Sample Concentration (ug/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	---	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											
Aroclor 1260	167	NA	0	171	NA	103	103	NA			

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 #: 19097B3b
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

METHOD: ✓ GC __ HPLC

Y N N/A Were all reported results recalculated and verified for all level IV samples?
Y N N/A Were all recalculated results for detected target compounds within 10% of the reported results?

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

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

Example:

Sample ID._____ Compound Name _____

Concentration =_____

#	Sample ID	Compound	Reported Concentrations	Recalculated Results Concentrations	Qualifications

Comments: _____

SAMPCALew.wpd

LDC Report# 19097B4

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 11, 2008

LDC Report Date: July 24, 2008

Matrix: Soil

Parameters: Metals

Validation Level: EPA Level III & IV

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F120167

Sample Identification

TSB-GJ-08-10
TSB-GJ-08-20**
TSB-GJ-08-30**
TSB-GJ-08-40
TSB-GJ-08-10MS
TSB-GJ-08-10MSD

**Indicates sample underwent EPA Level IV review

Introduction

This data review covers 6 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Methods 6010B, 6020, and 7000 for Metals. The metals analyzed were Aluminum, Antimony, Arsenic, Barium, Beryllium, Boron, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Lithium, Magnesium, Manganese, Molybdenum, Mercury, Nickel, Niobium, Palladium, Phosphorus, Platinum, Potassium, Selenium, Silicon, Silver, Sodium, Strontium, Sulfur, Thallium, Tin, Titanium, Tungsten, Uranium, Vanadium, and Zinc, and Zirconium.

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

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

Blanks are summarized in Section III.

Field duplicates are summarized in Section XIII.

Samples indicated by a double asterisk on the front cover underwent an EPA Level IV review. An EPA Level III review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Level III 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.

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

An initial calibration was performed.

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

III. Blanks

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

Method Blank ID	Analyte	Maximum Concentration	Associated Samples
ICB/CCB	Antimony Thallium Tungsten Vanadium Lithium Mercury	1.3 ug/L 1.1 ug/L 1.4 ug/L 2.7 ug/L 8.0 ug/L 0.1 ug/L	All samples in SDG F8F120167

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
TSB-GJ-08-10	Mercury	19.1 ug/Kg	35.7U ug/Kg
TSB-GJ-08-20**	Thallium Tungsten	0.40 mg/Kg 0.70 mg/Kg	0.48U mg/Kg 1.2U mg/Kg
TSB-GJ-08-30**	Lithium	65.0 mg/Kg	180U mg/Kg

Sample "RINSATE 1" (from SDG F8F120137) was identified as a rinsate. No metal contaminants were found in this blank with the following exceptions:

Rinsate ID	Sampling Date	Analyte	Concentration	Associated Samples
RINSATE 1	6/11/08	Calcium Iron Magnesium Manganese Silicon Sodium Strontium	131 ug/L 154 ug/L 17.9 ug/L 0.84 ug/L 38.6 ug/L 39.2 ug/L 1.5 ug/L	All samples in SDG F8F120167

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

IV. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

V. Matrix Spike Analysis

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

Spike ID (Associated Samples)	Analyte	MS (%R) (Limits)	MSD (%R) (Limits)	RPD (Limits)	Flag	A or P
TSB-GJ-08-10MS/MSD (All samples in SDG F8F120167)	Sulfur Phosphorus	140.1 (75-125) 134.8 (75-125)	135.4 (75-125) -	- -	J+ (all detects) J+ (all detects)	A
TSB-GJ-08-10MS/MSD (All samples in SDG F8F120167)	Antimony Copper Silicon Vanadium Lithium Nickel Tungsten Zinc	55.2 (75-125) 72.5 (75-125) 65.4 (75-125) 68.4 (75-125) - - - -	39.4 (75-125) 60.9 (75-125) 44.6 (75-125) 56.0 (75-125) 69.8 (75-125) 71.1 (75-125) 60.6 (75-125) 62.2 (75-125)	- - - - - - - -	J- (all detects) UJ (all non-detects)	A
TSB-GJ-08-10MS/MSD (All samples in SDG F8F120167)	Niobium	40.6 (75-125)	29.7 (75-125)	-	J- (all detects) R (all non-detects)	A

VI. Duplicate Sample Analysis

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

VII. Laboratory Control Samples (LCS)

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

VIII. Internal Standards (ICP-MS)

All internal standard percent recoveries (%R) were within QC limits for samples on which an EPA Level IV review was performed with the following exceptions:

Sample	Internal Standard	%R (Limits)	Analyte	Flag	A or P
TSB-GJ-08-20**	Scandium-45	127.557 (30-120)	Silicon Strontium	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A
TSB-GJ-08-30**	Scandium-45	129.653 (30-120)	Silicon Strontium	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A

Raw data were not evaluated for the samples reviewed by Level III criteria.

IX. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

X. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met with the following exceptions:

Diluted Sample	Analyte	%D (Limits)	Associated Samples	Flag	A or P
TSB-GJ-08-10L	Iron	10.4 (≤10)	All samples in SDG F8F120167	J (all detects)	A

XI. Sample Result Verification

All sample result verifications were acceptable for samples on which an EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

XII. Overall Assessment of Data

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

XIII. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel G
Metals - Data Qualification Summary - SDG F8F120167

SDG	Sample	Analyte	Flag	A or P	Reason
F8F120167	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40	Sulfur Phosphorus	J+ (all detects) J+ (all detects)	A	Matrix spike/Matrix spike duplicates (%R)
F8F120167	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40	Antimony Copper Silicon Vanadium Lithium Nickel Tungsten Zinc	J- (all detects) UJ (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R)
F8F120167	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40	Niobium	J- (all detects) R (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R)
F8F120167	TSB-GJ-08-20** TSB-GJ-08-30**	Silicon Strontium	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A	Internal standards (%R)
F8F120167	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40	Iron	J (all detects)	A	ICP serial dilution (%D)

BRC Tronox Parcel G
Metals - Laboratory Blank Data Qualification Summary - SDG F8F120167

SDG	Sample	Analyte	Modified Final Concentration	A or P
F8F120167	TSB-GJ-08-10	Mercury	35.7U ug/Kg	A
F8F120167	TSB-GJ-08-20**	Thallium Tungsten	0.48U mg/Kg 1.2U mg/Kg	A
F8F120167	TSB-GJ-08-30**	Lithium	180U mg/Kg	A

BRC Tronox Parcel G
Metals - Field Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

LDC #: 19097B4
SDG #: F8F120167
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III/IV

Date: 7/24/08
Page: 1 of 1
Reviewer: MH
2nd Reviewer: [illegible]

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/11/08
II.	Calibration	A	
III.	Blanks	SW	
IV.	ICP Interference Check Sample (ICS) Analysis	A	
V.	Matrix Spike Analysis	SW	MS/MSD
VI.	Duplicate Sample Analysis	N	
VII.	Laboratory Control Samples (LCS)	A	LCS
VIII.	Internal Standard (ICP-MS)	SW	Not reviewed for level 3
IX.	Furnace Atomic Absorption QC	N	Not utilized
X.	ICP Serial Dilution	SW	
XI.	Sample Result Verification	A	Not reviewed for Level III validation.
XII.	Overall Assessment of Data	A	
XIII.	Field Duplicates	N	
XIV.	Field Blanks	SW	R = RINSATE 1 (F8F120137)

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: ** Indicates sample underwent Level IV validation

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

Notes: _____

LDC #: 19097B4
SDG #: Cel creek

VALIDATION FINDINGS CHECKLIST

Reviewer: MH
2nd Reviewer: [illegible]

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

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Calibration				
Were all instruments calibrated daily, each set-up time?	✓			
Were the proper number of standards used?	✓			
Were all initial and continuing calibration verification %Rs within the 90-110% (80-120% for mercury and 85-115% for cyanide) QC limits?	✓			
Were all initial calibration correlation coefficients > 0.995? (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. ICP Interference Check Sample				
Were ICP interference check samples performed daily?	✓			
Were the AB solution percent recoveries (%R) with the 80-120% QC limits?	✓			
IV. Matrix spike/Matrix spike duplicates				
Were a matrix spike (MS) and duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD or MS/DUP. Soil / Water.	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the 75-125 QC limits? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.	✓			
Were the MS/MSD or duplicate relative percent differences (RPD) ≤ 20% for waters and ≤ 35% for soil samples? A control limit of +/- RL(+/-2X RL for soil) was used for samples that were ≤ 5X the RL, including when only one of the duplicate sample values were ≤ 5X the RL.	✓			
V. Laboratory control samples				
Was an LCS anaylzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the 80-120% QC limits for water samples and laboratory established QC limits for soils?	✓			
VI. Furnace Atomic Absorption QC				
If MSA was performed, was the correlation coefficients > 0.995?			✓	
Do all applicable analysies have duplicate injections? (Level IV only)			✓	
For sample concentrations > RL, are applicable duplicate injection RSD values < 20%? (Level IV only)			✓	
Were analytical spike recoveries within the 85-115% QC limits?			✓	

LDC #: 19097B4
SDG #: Gel Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: MM
2nd Reviewer: [signature]

Validation Area	Yes	No	NA	Findings/Comments
VII. ICP Serial Dilution				
Was an ICP serial dilution analyzed if analyte concentrations were > 50X the IDL?	✓			7 mo X MDL for Zn/Pb
Were all percent differences (%Ds) < 10%?		✓		
Was there evidence of negative interference? If yes, professional judgement will be used to qualify the data.		✓		
VIII. Internal Standards (EPA SW 846 Method 6020)				
Were all the percent recoveries (%R) within the 30-120% of the intensity of the internal standard in the associated initial calibration?		✓		
If the %Rs were outside the criteria, was a reanalysis performed?			✓	
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?			✓	
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
X. Sample Result Verification				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
XI. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
XII. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target analytes were detected in the field duplicates.			✓	
XIII. Field blanks				
Field blanks were identified in this SDG.	✓			
Target analytes were detected in the field blanks.	✓			

LDC #: 19097B4
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

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

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-4	Soil	(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,) ___
		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, ___
MS/6	Soil	(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,) ___
		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, ___
		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, ___
		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, ___
		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, ___
		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, ___
		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, ___
		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, ___
		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, ___
		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, ___
1-4	Soil	(Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr,) ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
MS/6	Soil	(Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr), ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
Analysis Method		
ICP		(Li, S) ___
ICP-MS		(Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si) ___
ICP-MS		(Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Zr,) ___
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)
Nb: Niobium, Pd: Palladium, P: Phosphorus, Pt: Platinum, S: Sulfur, W: Tungsten, U: Uranium, Zr: Zirconium

LDC #: 19097B4
SDG #: See Cover
METHOD: Trace Metals (EPA SW 846 Method 6010/6020/7000)
Sample Concentration units, unless otherwise noted: mg/Kg except Hg: ug/Kg

VALIDATION FINDINGS WORKSHEET
PB/ICB/CCB QUALIFIED SAMPLES

Soil preparation factor applied:
Associated Samples: All

Reviewer:
2nd Reviewer:

					Sample Identification									
Analyte	Maximum PB[a] (mg/Kg)	Maximum PB[a] (ug/L)	Maximum ICB/CCB[a] (ug/L)	Blank Action Limit	1	2	3							
Sb			1.3											
Tl			1.1	0.22		0.40 / 0.48								
W			1.4			0.70 / 1.2								
V			2.7											
Li			8.0				65.0 / 180							
Hg			0.1		19.1 / 35.7									

Samples with analyte concentrations within five times the associated ICB, CCB or PB concentration are listed above with the identifications from the Validation Completeness Worksheet. These sample results were qualified as not detected, "U".
Note : a - The listed analyte concentration is the highest ICB, CCB, or PB detected in the analysis of each element.

LDC #: 19097B4
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: Trace Metals (EPA SW846 6010B/6020/7000)
(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
Sampling date: 6/11/08 Soil factor applied 200X
Field blank type: (circle one) Field Blank / Rinsate / Other: R Associated Samples: All (>10X or > RL)

Analyte	Blank ID	Sample Identification											
	RINSATE 1	Action Level											
Ca	131	262											
Fe	154	308											
Mg	17.9												
Mn	0.84												
Si	38.6												
Na	39.2												
Sr	1.5												

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

LDC #: 190934
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

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

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 Was a matrix spike analyzed for each matrix in this SDG?

Y (N) N/A Were matrix spike percent recoveries (%R) within the control limits of 75-125? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.

Y (N) N/A Were all duplicate sample relative percent differences (RPD) ≤ 20% for water samples and ≤35% for soil samples?

LEVEL IV ONLY:

(Y) N N/A Were recalculated results acceptable? See Level IV Recalculation Worksheet for recalculations.

#	MS/MSD ID	Matrix	Analyte	MS %Recovery	MSD %Recovery	RPD (Limits)	Associated Samples	Qualifications
1	5/6	Soil	S	140.1	135.4		All	J+ L+/A
			Sb	55.2	39.4	35		J- /u J/A
			Cu	92.5	60.9			↓
			Mo	40.6	29.7			J- /R/A
			P	134.8				J+ L+/A
			Si	65.4	44.6			J- /u J/A
			V	68.4	~~56.0~~ 56.0			↓
			Li		69.8			J- /u J/A
			Ni		71.1			↓
			W		60.6			
			Zn		62.2			
			Li			20.9		No qual (LCSin)
			Sb			33.1		
			Ba			20.3		
			Ca			29.7		
			Co			26.0		
			Ti			20.9		
			W			18.0		
			U			22.6		↓

Comments: ~~Al~~, ~~Ca~~, ~~Fe~~, ~~Mg~~, ~~Mn~~, ~~Sr~~, Ti 74X

LDC #: 19097B4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Internal Standards (ICP-MS)

Reviewer: VA
2nd Reviewer: R

METHOD: Metals (EPA SW 846 Method 6020)

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

Y (N) N/A Were all internal standard percent recoveries within 30-120% of the intensity of the internal standard in the initial calibration standard ?

Y (N) N/A If the response to either of the above questions is no, were the samples reanalyzed as required ?

#	Internal Standard	Associated Metals	%R (Limits)	Associated Samples	Qualifications
1	Sc^{45}	Si, Sr,	127, 557	2	J/UJ/A
2	Sc^{45}	↓	129, 653	3	↓

LDC #: 19097B4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
ICP Serial Dilution

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

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

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

Y N N/A If analyte concentrations were > 50X the MDL (ICP) ,or >100X the MDL (ICP/MS), was a serial dilution analyzed?
Y N N/A Were ICP serial dilution percent differences (%D) ≤10%?
Y N N/A Is there evidence of negative interference? If yes, professional judgement will be used to qualify the data.

LEVEL IV ONLY:

Y N N/A Were recalculated results acceptable? See Level IV Recalculation Worksheet for recalculations.

#	Date	Diluted Sample ID	Matrix	Analyte	%D (Limits)	Associated Samples	Qualifications
1		1	Soil	Fe	10.4	All	J (+)/A

Comments: Na, K < 100X MDL

SDILICPMS.wpd

LDC #: 19097B4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Initial and Continuing Calibration Calculation Verification

Reviewer: MM
2nd Reviewer: [illegible]

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

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

%R = Found x 100 / True

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

Standard ID	Type of Analysis	Element	Found (ug/L)	True (ug/L)	Recalculated %R	Reported %R	Acceptable (Y/N)
ICV	ICP (Initial calibration)	S	42700	40000	106.8	106.8	Y
	GFAA (Initial calibration)						
ICV	CVAA (Initial calibration)	Hg	2.33	2.5	93.2	93.2	Y
CCV	ICP (Continuing calibration)	Li	4920	5000	98.4	98.4	↓
	GFAA (Continuing calibration)						
CCV	CVAA (Continuing calibration)	Hg	4.98	5.0	99.6	99.6	Y
ICV	ICP/MS (Initial calibration)	Co	1011.8	1000	101.2	101.2	↓
CCV	ICP/MS (Continuing calibation)	W	1068.8	1000	106.9	106.9	↓

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 #: 19097B4
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

Page: 1 of 1
Reviewer: MM
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)	True / D / SDR (units)	Recalculated %R / RPD / %D	Reported %R / RPD / %D	Acceptable (Y/N)
ICSAB	ICP interference check	As	95.605	100	95.6	95.6	Y
LCS	Laboratory control sample	Mo	26.87	25.0	107.5	107.5	
5	Matrix spike	K	(SSR-SR) 1101.3	1338.6	82.3	82.3	
5/6	Duplicate	Pb	31.85	34.9	9.2	9.0	
1	ICP serial dilution	Mn	413.81	438.56	5.6	5.6	

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 #: 19097B4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 2
Reviewer: MH
2nd reviewer: M

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 2 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:

$$Mg = \frac{5418.7\ ug/L \times 0.1\ L \times 2}{0.5g \times 0.8379} = 2583\ mg/kg$$

Sample ID	Analyte	Reported Concentration (mg/kg)	Calculated Concentration (mg/kg)	Acceptable (Y/N)
2	Li	93.5	93.5	Y
	S	6030	6030	
	Al	11900	11900	
	As	24.4	24.4	
	Ba	43.4	43.2	
	Be	0.54	0.54	
	B	22.1	22.1	
	Ca	9510	9510	
	Cr	30.3	30.3	
	Co	4.8	4.8	
	Cu	11.4	11.4	
	Fe	11200	11200	
	Pb	7.8	7.8	
	Mg	2500	2500	
	Mn	153	152	
	Mo	0.56	0.56	
	Ni	11.6	11.6	
	Pd	0.24	0.24	
	P	484	483	
	K	3190	3190	
	Si	323	323	
	Ag	0.17	0.17	↓

LDC #: 19097B4
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer: MH
2nd reviewer:

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

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

Y N N/A Have results been reported and calculated correctly?
Y N N/A Are results within the calibrated range of the instruments and within the linear range of the ICP?
Y N N/A Are all detection limits below the CRDL?

Detected analyte results for 2 were recalculated and verified using the following equation:

Concentration = $\frac{(RD)(FV)(Dil)}{(In.\ Vol.)(\%S)}$ Recalculation:

RD = Raw data concentration
FV = Final volume (ml)
In. Vol. = Initial volume (ml) or weight (G)
Dil = Dilution factor
%S = Decimal percent solids

Sample ID	Analyte	Reported Concentration (mg/kg)	Calculated Concentration (mg/kg)	Acceptable (Y/N)
	Na	186	186	Y
	Sr	1.6	1.6	
	Tl	0.40	0.40	
	Sn	0.51	0.51	
	Ti	528	528	
	W	0.70	0.70	
	U	5.4	5.4	
	V	42.3	42.3	
	Zn	32.8	32.7	
	Zr	29.8	29.8	

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 11, 2008

LDC Report Date: July 23, 2008

Matrix: Soil

Parameters: Wet Chemistry

Validation Level: EPA Level III & IV

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F120167

Sample Identification

TSB-GJ-08-10
TSB-GJ-08-20**
TSB-GJ-08-30**
TSB-GJ-08-40
TSB-GJ-08-10MS
TSB-GJ-08-10DUP

**Indicates sample underwent EPA Level IV review

Introduction

This data review covers 6 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA Method 300.0 for Bromide, Bromine, Chlorate, Chloride, Chorine, Fluoride, Nitrate as Nitrogen, Nitrite as Nitrogen, Orthophosphate as Phosphorus, and Sulfate and EPA SW 846 Method 9071B for Oil & Grease.

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

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

Samples indicated by a double asterisk on the front cover underwent a EPA Level IV review. A EPA Level III review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Level III 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.

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

All criteria for the initial calibration of each method were met.

b. Calibration Verification

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

III. Blanks

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

Method Blank ID	Analyte	Concentration	Associated Samples
CCB1	Orthophosphate as P	0.260 mg/L	TSB-GJ-08-10
CCB2	Orthophosphate as P	0.212 mg/L	TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40

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

Sample "RINSATE 1" (from SDG F8F120137) was identified as a rinsate. No contaminant concentrations were found in this blank with the following exceptions:

Rinsate ID	Sampling Date	Analyte	Concentration	Associated Samples
RINSATE 1	6/11/08	Sulfate	0.12 mg/L	All samples in SDG F8F120167

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

IV. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) samples were reviewed for each matrix as applicable. Percent recoveries (%R) were within QC limits.

V. Duplicates

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable. Results were within QC limits.

VI. Laboratory Control Samples

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

VII. Sample Result Verification

All sample result verifications were acceptable for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel G
Wet Chemistry - Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Wet Chemistry - Laboratory Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Wet Chemistry - Field Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

LDC #: 19097B6
SDG #: F8F120167
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III/IV

Date: 7/23/08
Page: 1 of 1
Reviewer:
2nd Reviewer:

METHOD: (Analyte) Bromide, Bromine, Chlorate, Chloride, Chorine, Fluoride, Nitrate, Nitrite, Orthophosphate-P, Sulfate (EPA Method 300.0), O & G (EPA SW846 Method 9071B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/11/08
IIa.	Initial calibration	A	
IIb.	Calibration verification	A	
III.	Blanks	SW	
IV	Matrix Spike/Matrix Spike Duplicates	A	3MS/1dup
V	Duplicates	A	
VI.	Laboratory control samples	A	LCS
VII.	Sample result verification	A	Not reviewed for Level III validation.
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X	Field blanks	SW	R = RINSATE 1 (F8F120137)

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: ** Indicates sample underwent Level IV validation

1	TSB-GJ-08-10	11		21		31	
2	TSB-GJ-08-20**	12		22		32	
3	TSB-GJ-08-30**	13		23		33	
4	TSB-GJ-08-40	14		24		34	
5	TSB-GJ-08-10MS	15		25		35	
6	TSB-GJ-08-10DUP	16		26		36	
7	HB	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

LDC #: 19097B6
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

Reviewer: MG
2nd Reviewer:

Method: Inorganics (EPA Method See cover

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Calibration				
Were all instruments calibrated daily, each set-up time?	✓			
Were the proper number of standards used?	✓			
Were all initial calibration correlation coefficients ≥ 0.995?	✓			
Were all initial and continuing calibration verification %Rs within the 90-110% QC limits?	✓			
Were titrant checks performed as required? (Level IV only)			✓	
Were balance checks performed as required? (Level IV only)	✓			
III. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
IV. Matrix spike/Matrix spike 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 #: 19097B6
SDG #: See cover

VALIDATION FINDINGS CHECKLIST

Reviewer: MM
2nd Reviewer: [illegible]

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. Blanks				
Field blanks were identified in this SDG.	✓			
Target analytes were detected in the field blanks.	✓			

LDC #: 19097B6
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Analysis Reference

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

All circled methods are applicable to each sample.

Sample ID	Matrix	Parameter
1-4	Soil	Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
MS/D	Soil	Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH

Comments: O+G MS/Dup from raw data.

LDC #: 19097B6
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Blanks

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: Inorganics, Method See cover

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
N N/A Were all samples associated with a given method blank?
N N/A Were any inorganic contaminants detected above the reporting limit in the method blanks? If yes, please see qualifications below.

Conc. units: mg/kg **Associated Samples:** CCB1=1, CCB2=2-4 (NO)

Analyte	Blank ID	Maximum ICB/CCB mg/L	Blank Action Limit	Sample Identification								
CCB1 o-PO4-P		0.260										
CCB2 o-PO4-P		0.212										

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

LDC #: 19097B6
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: Inorganics, EPA Method See cover

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

Blank units: mg/L **Associated sample units:** mg/kg
Sampling date: 6/11/08 Soil factor applied
Field blank type: (circle one) Field Blank / Rinsate / Other: R Associated Samples: All (>RL)

Analyte	Blank ID	Blank Action Limit	Sample Identification									
	RINSATE											
SO4	0.12											

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

Analyte	Blank ID	Blank Action Limit	Sample Identification									

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

LDC #: 190786
SDG #: see cover

Validatin Findings Worksheet
Initial and Continuing Calibration Calculation Verification

Reviewer: MM
2nd Reviewer:

Method: Inorganics, Method see cover

The correlation coefficient (r) for the calibration of NO_3-N was recalculated.Calibration date: 6/18/08

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	NO3-N	s1	20	0.01	*0.99997*	0.99990	Y
		s2	100	0.046			
		s3	200	0.087			
		s4	500	0.227			
		s5	1000	0.454			
CCV Calibration verification	NO_3	4000	3885.7		96.39	NR	Y
CCV Calibration verification	F	1000	945.5		94.55	94.55	↓
CCV Calibration verification	Cl	2000	1936.6		96.83	96.83	↓

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 #: 19097B6
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

Reviewer: MM
2nd Reviewer: [illegible]

METHOD: Inorganics, Method See cover

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

%R = Found / True x 100 Where, Found = concentration of each analyte measured in the analysis of the sample. For the matrix spike calculation, Found = SSR (spiked sample result) - SR (sample result).
True = concentration of each analyte in the source.

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

RPD = |S-D| / (S+D)/2 x 100 Where, S = Original sample concentration
D = Duplicate sample concentration

Sample ID	Type of Analysis	Element	Found / S (units)	True / D (units)	Recalculated %R / RPD	Reported %R / RPD	Acceptable (Y/N)
LCS	Laboratory control sample	O-PO4-P	79.14	80	99	99	Y
5	Matrix spike sample	BY	(SSR-SR) 20.6	21.4	96	96	↓
6	Duplicate sample	SO4	14.7	14.4	2.1	2.3	↓

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 #: 19097B6
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

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 All reported with a positive detect were recalculated and verified using the following equation:

Concentration =

$$SO_4 = \frac{\text{Area} \times DF}{0.000157}$$

Recalculation:

$$SO_4 = \frac{0.374 \times 10 \times 0.04\,l}{0.000157 \times 4\,g \times 0.838} = 284\ mg/kg$$

#	Sample ID	Analyte	Reported Concentration (mg/kg)	Calculated Concentration (mg/kg)	Acceptable (Y/N)
1	2	Chloride	1.0	1.0	Y
		Cl	14.6	14.6	
		Cl_2	29.2	29.2	
		F	1.0	1.0	
		NO_3-N	1.3	1.3	
		SO_4	285	284	

Note:

LDC Report# 19097B7

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 11, 2008

LDC Report Date: July 22, 2008

Matrix: Soil

Parameters: Gasoline Range Organics

Validation Level: EPA Level III & IV

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F120167

Sample Identification

TSB-GJ-08-10
TSB-GJ-08-10RE
TSB-GJ-08-20**
TSB-GJ-08-30**
TSB-GJ-08-40
TSB-GJ-08-10MS
TSB-GJ-08-10DUP

**Indicates sample underwent EPA Level IV review

Introduction

This data review covers 7 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Gasoline Range Organics.

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

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

Samples indicated by a double asterisk on the front cover underwent a EPA Level IV review. A EPA Level III review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Level III 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.

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed as required by the method.

The percent relative standard deviations (%RSD) of calibration factors for compounds were less than 20.0% .

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 15.0% QC limits.

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

III. Blanks

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

Sample "RINSATE 1" (from SDG F8F120137) was identified as a rinsate. No gasoline range organic contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) samples were reviewed for each matrix as applicable. Percent recoveries (%R) were within QC limits.

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable. Results were within QC limits.

c. 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.

V. Target Compound Identification

All target compound identifications were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

VI. Compound Quantitation and CRQLs

All compound quantitation and CRQLs were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

VII. System Performance

The system performance was acceptable for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel G
Gasoline Range Organics - Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

LDC #: 19097B7
SDG #: F8F120167
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III/IV

Date: 7/21/08
Page: 1 of 1
Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: GC Gasoline Range Organics (EPA SW846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/11/08
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	A	ICV ≤ 15
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates /DUP	A/A	NO MSD
IVc.	Laboratory control samples	A	LCS/D
V.	Target compound identification	A	Not reviewed for Level III validation.
VI.	Compound Quantitation and CRQLs	A	Not reviewed for Level III validation.
VII.	System Performance	A	Not reviewed for Level III validation.
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	R = Rinsate 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: ** Indicates sample underwent Level IV validation

SO 1 L

1 1	TSB-GJ-08-10	11	F8F130000-269	21 1	8165269	31	6/14
2 1	TSB-GJ-08-10RE	12	F8F170000-178	22	8169178	32	6/17
3 1	TSB-GJ-08-20**	13		23		33	
4 1	TSB-GJ-08-30**	14		24		34	
5 2	TSB-GJ-08-40	15		25		35	
6 1	TSB-GJ-08-10MS	16		26		36	
7 ~~1~~	~~TSB-GJ-08-10MSD~~	17		27		37	
8 1	TSB-GJ-08-10DUP	18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 19097B7
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

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

Method: ____GC ____HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibrations				
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?	✓			
IV. Continuing calibration				
What type of continuing calibration calculation was performed? ____%D or ____%R	✓			
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 15%.0 or percent recoveries 85-115%?	✓			
Were all the retention times within the acceptance windows?	✓			
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed for each matrix and concentration?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
VI. Surrogate Spikes				
Were all surrogate %R within the QC limits?	✓			
If the percent recovery (%R) 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				
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?	✓			

LDC #: 19097B7
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Reviewer:
2nd Reviewer:

Validation Area	Yes	No	NA	Findings/Comments
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 and dry weight factors applicable to level IV validation?	✓			
XII. System performance				
System performance was found to be acceptable.	✓			
XIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
XIV. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target compounds were detected in the field duplicates.			✓	
XV. Field blanks				
Field blanks were identified in this SDG.	✓			
Target compounds were detected in the field blanks.		✓		

LDC #: 19097B7
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Page: 1 of 1
Reviewer:
2nd Reviewer:

METHOD: GC ✓ HPLC

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

CF = A/C
average CF = sum of the CF/number of standards
%RSD = 100 * (S/X)

A = Area of compound,
C = Concentration of compound,
S = Standard deviation of the CF
X = Mean of the CFs

#	Standard ID	Calibration Date	Compound	Reported CF (1.0 std)	Recalculated CF (1.0 std)	Reported Average CF (initial)	Recalculated Average CF (initial)	Reported %RSD	Recalculated %RSD
1	ICAL	5/27/08	GRO	17025649	17025649	17182732	17182732	3.715	3.715
2									
3									
4									

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.

INICIAL SB

LDC #: 1909787
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

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

METHOD: GC ✓ HPLC ____

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

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

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

#	Standard ID	Calibration Date	Compound	Average CF(Ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %D	Recalculated %D
1	ICAL396B	6/13/08	GRO	1.0	0.9982	0.9982	0.2	0.2
2								
3								
4								

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

_DC #: 1909787
SDG #: all covered

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Page: 1 of 1
Reviewer:
2nd reviewer:

METHOD: __ GC / __ HPLC

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: # 3

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	
TFT	not specified	0.04	0.03308	83	83	0

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	

LDC #: 14097161
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: m
2nd Reviewer: e

METHOD: ✓ GC __ HPLC

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

%Recovery = 100 * (SSC - SC)/SA Where SSC = Spiked sample concentration SC = Sample concentration
SA = Spike added
RPD =(({SSCMS - SSCMSD} * 2) / (SSCMS + SSCMSD))*100 MS = Matrix spike MSD = Matrix spike duplicate

MS/MSD samples: 6

Compound	Spike Added (mg/kg)		Sample Conc. (mg/kg)	Spike Sample Concentration (mg/kg)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	---	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)	1.07	NA	0	1.03	NA	96	96	NA			
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											

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

LDC #: 19097B7
SDG #: pw cover

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

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

_____METHOD: _/_ GC __HPLC

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

RPD =(({SSCLCS - SSCLCSD} * 2) / (SSCLCS + SSCLCSD))*100 LCS = Laboratory Control Sample percent recovery LCSD = Laboratory Control Sample duplicate percent recovery

LCS/LCSD samples: 816 5269 - LCS ID

Compound	Spike Added (mg/kg)		Sample Conc. (mg/kg)	Spike Sample Concentration (mg/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	---	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)	1.0	1.0		1.0	0.944	100	100	94	94	6.2	6.2
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											

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

LDC #: 19097B7
SDG #: All cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

METHOD: ✓ GC ___ HPLC

Y N N/A Were all reported results recalculated and verified for all level IV samples?
Y N N/A Were all recalculated results for detected target compounds within 10% of the reported results?

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

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

Example:

Sample ID._____ Compound Name _____

Concentration = _____

ND

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

Comments: _____

SAMPCALew.wpd

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 11, 2008

LDC Report Date: July 22, 2008

Matrix: Soil

Parameters: Diesel Range Organics

Validation Level: EPA Level III & IV

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F120167

Sample Identification

TSB-GJ-08-10
TSB-GJ-08-20**
TSB-GJ-08-30**
TSB-GJ-08-40
TSB-GJ-08-10MS
TSB-GJ-08-10MSD

**Indicates sample underwent EPA Level IV review

Introduction

This data review covers 6 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Diesel Range Organics.

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

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

Samples indicated by a double asterisk on the front cover underwent a EPA Level IV review. A EPA Level III review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Level III 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.

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed as required by the method.

The percent relative standard deviations (%RSD) of calibration factors for compounds were less than 20.0% .

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 15.0% QC limits.

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

III. Blanks

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

Sample "RINSATE 1" (from SDG F8F120137) was identified as a rinsate. No diesel range organic contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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
TSB-GJ-08-20**	ortho-Terphenyl	41 (75-150)	Diesel range organics	J- (all detects) UJ (all non-detects)	P

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

All target compound identifications were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

VI. Compound Quantitation and CRQLs

All compound quantitation and CRQLs were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

VII. System Performance

The system performance was acceptable for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel G
Diesel Range Organics - Data Qualification Summary - SDG F8F120167

SDG	Sample	Compound	Flag	A or P	Reason
F8F120167	TSB-GJ-08-20**	Diesel range organics	J- (all detects) UJ (all non-detects)	P	Surrogate recovery (%R)

BRC Tronox Parcel G
Diesel Range Organics - Laboratory Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Diesel Range Organics - Field Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

LDC #: 19097B8
SDG #: F8F120167
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III/IV

Date: 7/21/08
Page: 1 of 1
Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: GC Diesel Range Organics (EPA SW846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/11/08
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	A	ICV ≤ 15
III.	Blanks	A	
IVa.	Surrogate recovery	SW	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	A	Not reviewed for Level III validation.
VI.	Compound Quantitation and CRQLs	A	Not reviewed for Level III validation.
VII.	System Performance	A	Not reviewed for Level III validation.
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	R = Rinsate / SDG # F8F120167

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

Validated Samples: ** Indicates sample underwent Level IV validation SOIL

1	TSB-GJ-08-10	11		21		31	
2	TSB-GJ-08-20**	12		22		32	
3	TSB-GJ-08-30**	13		23		33	
4	TSB-GJ-08-40	14		24		34	
5	TSB-GJ-08-10MS	15		25		35	
6	TSB-GJ-08-10MSD	16		26		36	
7	F8F130000-291	17	8165291	27		37	
8	F8F180000-312	18	8170312	28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 19097B8
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Reviewer: [illegible]
2nd Reviewer: [illegible]

Method: ___ GC ___ HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
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?	✓			
IV. Continuing calibration				
What type of continuing calibration calculation was performed? ____%D or ____%R	✓			
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 15%.0 or percent recoveries 85-115%?	✓			
Were all the retention times within the acceptance windows?	✓			
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed for each matrix and concentration?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
VI. Surrogate spikes				
Were all surrogate %R within the QC limits?		✓		
If the percent recovery (%R) 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				
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?	✓			

LDC #: 19097B8
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Reviewer: PR
2nd Reviewer: [illegible]

Validation Area	Yes	No	NA	Findings/Comments
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 and dry weight factors applicable to level IV validation?	✓			
XII. System performance				
System performance was found to be acceptable.	✓			
XIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
XIV. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target compounds were detected in the field duplicates.			✓	
XV. Field blanks				
Field blanks were identified in this SDG.	✓			
Target compounds were detected in the field blanks.		✓		

LDC #: 19097B8
SDG #: all cancel

VALIDATION FINDINDS WORKSHEET
Surrogate Recovery

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

METHOD: __GC __HPLC

Are surrogates required by the method? Yes____ or No____.

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

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

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

#	Sample ID	Detector/ Column	Surrogate Compound	%R (Limits)	Qualifications
	2	Not Specified	H	41 (75 - 150)	J-/UJ/P
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

	Surrogate Compound		Surrogate Compound		Surrogate Compound		Surrogate Compound		
A	Chlorobenzene (CBZ)	G	Octacosane	M	Benzo(e)Pyrene	S	1-Chloro-3-Nitrobenzene	Y	Tetrachloro-m- xylene
B	4-Bromofluorobenzene (BFB)	H	Ortho-Terphenyl	N	Terphenyl-D14	T	3,4-Dinitrotoluene		
C	a,a,a-Trifluorotoluene	I	Fluorobenzene (FBZ)	O	Decachlorobiphenyl (DCB)	U	Tripentyltin		
D	Bromochlorobenene	J	n-Triacontane	P	1-methylnaphthalene	V	Tri-n-propyltin		
E	1,4-Dichlorobutane	K	Hexacosane	Q	Dichlorophenyl Acetic Acid (DCAA)	W	Tributyl Phosphate		
F	1,4-Difluorobenzene (DFB)	L	Bromobenzene	R	4-Nitrophenol	X	Triphenyl Phosphate		

LDC #: 19097B8
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

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

METHOD: GC ✓ HPLC ____

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

CF = A/C
average CF = sum of the CF/number of standards
%RSD = 100 * (S/X)

A = Area of compound,
C = Concentration of compound,
S = Standard deviation of the CF
X = Mean of the CFs

#	Standard ID	Calibration Date	Compound	Reported CF (1000 std)	Recalculated CF (1000 std)	Reported Average CF (initial)	Recalculated Average CF (initial)	Reported %RSD	Recalculated %RSD
1	LCAL	5/16/08	DRO	16236	16236	16023	16023	3.456	3.456
2									
3									
4									

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 #: 19097B8
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer:
2nd Reviewer:

METHOD: GC_____ HPLC_____

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

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

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

#	Standard ID	Calibration Date	Compound	Average CF(Ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %D	Recalculated %D
1	ECAL525	6/17/08	DRO	10000	996.53	996.53	0.3	0.3
	ECAL537	6/17/08	↓	↓	1034.562/	1034.562/	3.5	3.5
2								
3								
4								

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

DC #: 1909788
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Reviewer:
2nd reviewer:

METHOD: / GC __ HPLC

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: #2

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	
o-Terphenyl	not specified	25.	10.2	41	41	0

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	

LDC #: 19097B8
SDG #: fw cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: /GC __HPLC

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

%Recovery = 100 * (SSC - SC)/SA Where SSC = Spiked sample concentration SC = Sample concentration
SA = Spike added
RPD =(({SSCMS - SSCMSD} * 2) / (SSCMS + SSCMSD))*100 MS = Matrix spike MSD = Matrix spike duplicate

MS/MSD samples: 5 + 6

Compound	Spike Added (mg/kg)		Sample Conc. (mg/kg)	Spike Sample Concentration (mg/kg)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	---	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)	87.2	85.8	ND	74.5	76.1	85	85	89	89	5.2	5.2
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											

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

LDC #: 19097B38
SDG #: pw cover

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

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

_____METHOD: / GC __HPLC

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

RPD =(({SSCLCS - SSCLCSD} * 2) / (SSCLCS + SSCLCSD))*100 LCS = Laboratory Control Sample percent recovery LCSD = Laboratory Control Sample duplicate percent recovery

LCS/LCSD samples: 816529I - LCS

Compound	Spike Added (mg/kg)		Sample Conc. (mg/kg)	Spike Sample Concentration (mg/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	---	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)	83.3	NA	0	68.9	NA	83	83	NA			
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											

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

LDC #: 19097B8
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: ✓ GC __ HPLC

Y N N/A Were all reported results recalculated and verified for all level IV samples?
Y N N/A Were all recalculated results for detected target compounds within 10% of the reported results?

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

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

Example:

Sample ID._____ Compound Name _____

Concentration = _____

ND

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

Comments: _____

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 11, 2008

LDC Report Date: July 22, 2008

Matrix: Soil

Parameters: Polynuclear Aromatic Hydrocarbons

Validation Level: EPA Level III & IV

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F120167

Sample Identification

TSB-GJ-08-10
TSB-GJ-08-20**
TSB-GJ-08-30**
TSB-GJ-08-40
TSB-GJ-08-10MS
TSB-GJ-08-10MSD

**Indicates sample underwent EPA Level IV review

Introduction

This data review covers 6 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8310 for Polynuclear Aromatic Hydrocarbons.

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

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

Samples indicated by a double asterisk on the front cover underwent a EPA Level IV review. A EPA Level III review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by Level III 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.

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed as required by the method.

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

Retention time windows were evaluated and considered technically acceptable for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples on which a Level III review was performed.

b. Calibration Verification

Calibration verification was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 15.0% QC limits with the following exceptions:

Date	Detector	Compound	%D	Associated Samples	Flag	A or P
6/16/08	Not specified	Benzo(g,h,i)perylene	15.2	All samples in SDG F8F120167	J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds with the following exceptions:

Date	Detector	Compound	%D	Associated Samples	Flag	A or P
6/4/08	Not specified	Benzo(k)fluoranthene	16.6	All samples in SDG F8F120167	J+ (all detects)	A

Retention time windows were evaluated and considered technically acceptable for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples on which a Level III review was performed.

III. Blanks

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

Sample "Rinsate 1" (from SDG F8F120137) was identified as a rinsate. No polynuclear aromatic hydrocarbon contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

All target compound identifications were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

VI. Compound Quantitation and CRQLs

All compound quantitation and CRQLs were within validation criteria for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

VII. System Performance

The system performance was acceptable for samples on which a EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by Level III criteria.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel G
Polynuclear Aromatic Hydrocarbons - Data Qualification Summary - SDG F8F120167

SDG	Sample	Compound	Flag	A or P	Reason
F8F120167	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40	Benzo(g,h,i)perylene	J+ (all detects)	A	Continuing calibration (%D)
F8F120167	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40	Benzo(k)fluoranthene	J+ (all detects)	A	Continuing calibration (ICV %D)

BRC Tronox Parcel G
Polynuclear Aromatic Hydrocarbons - Laboratory Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Polynuclear Aromatic Hydrocarbons - Field Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

LDC #: 19097B9
SDG #: F8F120167
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III/IV

Date: 7/21/08
Page: 1 of 1
Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: GC Polynuclear Aromatic Hydrocarbons (EPA SW 846 Method 8310)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/11/08
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	SW	ICV ≤ 15
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	A	Not reviewed for Level III validation.
VI.	Compound Quantitation and CRQLs	A	Not reviewed for Level III validation.
VII.	System Performance	A	Not reviewed for Level III validation.
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	ND	R = Rinsate / SDG # F8F120137

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: ** Indicates sample underwent Level IV validation

SOIL

1	TSB-GJ-08-10	11	F8J160000-15B	21	8168158	31	
2	TSB-GJ-08-20**	12		22		32	
3	TSB-GJ-08-30**	13		23		33	
4	TSB-GJ-08-40	14		24		34	
5	TSB-GJ-08-10MS	15		25		35	
6	TSB-GJ-08-10MSD	16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 19097B9
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

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

Method: / GC _____ HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
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?	✓			
IV. Continuing calibration				
What type of continuing calibration calculation was performed? ____%D or ____%R	✓			
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) < 15%.0 or percent recoveries 85-115%?		✓		
Were all the retention times within the acceptance windows?	✓			
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed for each matrix and concentration?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
VI. Surrogate spikes				
Were all surrogate %R within the QC limits?	✓			
If the percent recovery (%R) 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				
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?	✓			

LDC #: 190713B9
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Reviewer: [illegible]
2nd Reviewer: [illegible]

Validation Area	Yes	No	NA	Findings/Comments
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 and dry weight factors applicable to level IV validation?	✓			
XII. System Performance				
System performance was found to be acceptable.	✓			
XIII. Overall Assessment of Data				
Overall assessment of data was found to be acceptable.	✓			
XIV. Field Duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target compounds were detected in the field duplicates.			✓	
XV. Field Blanks				
Field blanks were identified in this SDG.	✓			
Target compounds were detected in the field blanks.		✓		

LDC #: 19097B9
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Reviewer: PT
2nd Reviewer:

METHOD: ✓ GC __ HPLC

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
What type of continuing calibration calculation was performed? __%D or __RPD
(Y) N N/A Were continuing calibration standards analyzed at the required frequencies?
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ≤15.0%?
Level IV Only
(Y) N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ 15.0)	RT (limit)	Associated Samples	Qualifications
+	6/4/08	QICV768	not specified	H	16.6	( )	All + Blk	J+/A det
						( )		
						( )		
+	6/16/08	QCAL873	↓	G	15.2	( )	↓	J+/A det
						( )		
						( )		
				H = Benzo (K) fluoranthene		( )		
				G = Benzo (g,h,i) perylene		( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		

LDC #: 190978B9
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Page: 1 of 1
Reviewer:
2nd Reviewer:

METHOD: GC ✓ HPLC ____

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

CF = A/C
average CF = sum of the CF/number of standards
%RSD = 100 * (S/X)

A = Area of compound,
C = Concentration of compound,
S = Standard deviation of the CF
X = Mean of the CFs

#	Standard ID	Calibration Date	Compound	Reported CF (0-5 std)	Recalculated CF (0-5 std)	Reported Average CF (initial)	Recalculated Average CF (initial)	Reported %RSD	Recalculated %RSD
1	ICAL	6/4/08	Naphthalene	24206	24206	23507	23507	3.24	3.24
			Anthracene	815734	815734	806710	806710	1.821	1.821
2									
3									
4									

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 #: 190978B9
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

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

METHOD: GC ✓ HPLC ____

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

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

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

#	Standard ID	Calibration Date	Compound	Average CF(ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %D	Recalculated %D
1	QCA L873	6/16/08	naphthalene	5.0	5.3978	5.3978	8.0	8.0
			anthracene	0.50	0.5307	0.5307	6.1	6.1
2								
3								
4								

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

DC #: 1907407
SDG #: all covered

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Reviewer: [illegible]
2nd reviewer: [illegible]

METHOD: ~~GC~~ HPLC

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: 2

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
p-Terphenyl	not specified	25	21.3996	86	86	0

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference

LDC #: [illegible]

SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: [illegible]

2nd Reviewer: [illegible]

METHOD: GC __HPLC

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

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

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

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

MS/MSD samples: 5 + 6

Compound	Spike Added (ug/kg)		Sample Conc. (ug/kg)	Spike Sample Concentration (ug/kg)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	---	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)	67.8	70.9	ND	50.5	51.5	72	72	73	73	2.0	2.0
Anthracene (8310)	67.8	70.9		52.9	49.6	76	76	70	70	6.5	6.5
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											

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

LDC #: 19097B9
SDG #: pw cover

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

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

_____METHOD: __GC __HPLC

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

RPD =(({SSCLCS - SSCLCSD} * 2) / (SSCLCS + SSCLCSD))*100 LCS = Laboratory Control Sample percent recovery LCSD = Laboratory Control Sample duplicate percent recovery

LCS/LCSD samples: 8168158-LCS

Compound	Spike Added (ug/kg)		Sample Conc. (ug/kg)	Spike Sample Concentration (ug/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	---	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)											
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)	66.7	NA		48.4	NA	73	37				
Anthracene (8310)	66.7	↓		51.2	↓	77	77	NA			
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											

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

LDC #: 19097139
SDG #: all covered

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer: MD
2nd Reviewer: [illegible]

METHOD: X GC ___ HPLC

Y N N/A Were all reported results recalculated and verified for all level IV samples?
Y N N/A Were all recalculated results for detected target compounds within 10% of the reported results?

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

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

Example:

Sample ID. _____ Compound Name _____

Concentration = _____

ND

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

Comments: _____

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 11, 2008

LDC Report Date: July 23, 2008

Matrix: Soil

Parameters: Dioxins/Dibenzofurans

Validation Level: EPA Level III & IV

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F120167

Sample Identification

TSB-GJ-08-10
TSB-GJ-08-20**
TSB-GJ-08-30**
TSB-GJ-08-40

**Indicates sample underwent EPA Level IV review

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 8290 for Polychlorinated Dioxins/Dibenzofurans.

This review follows USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Samples indicated by a double asterisk on the front cover underwent EPA Level IV review. EPA Level III review was performed on all of the other samples. Raw data were not evaluated for the samples reviewed by EPA Level III 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.

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

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

A Indicates the finding is based upon technical validation criteria.

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

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

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

The exact mass of 380.9760 of PFK was verified. The static resolving power was at least 10,000 (10% valley definition) for samples on which EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by EPA Level III criteria.

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

The minimum S/N ratio for each target compound was greater than or equal to 2.5 and and greater than or equal to 10 for each recovery and internal standard compound for samples on which EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by EPA Level III criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks.

Sample "RINSATE 1" (from SDG F8F120137) was identified as a rinsate. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank.

VI. 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.

VII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. The percent recoveries (%R) were within the QC limits with the following exceptions:

LCS ID	Compound	%R (Limits)	Associated Samples	Flag	A or P
8170493LCS	1,2,3,7,8,9-HxCDD OCDD	137 (71-129) 154 (74-144)	All samples in SDG F8F120167	J+ (all detects) J+ (all detects)	P

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

Sample	Internal Standards	%R (Limits)	Compound	Flag	A or P
TSB-GJ-08-20**	^{13}C-OCDD ^{13}C-1,2,3,4,6,7,8-HpCDF	37 (40-135) 39 (40-135)	OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
TSB-GJ-08-30**	^{13}C-OCDD	29 (40-135)	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
TSB-GJ-08-40	^{13}C-OCDD ^{13}C-1,2,3,4,6,7,8-HpCDF	26 (40-135) 33 (40-135)	OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P

X. Target Compound Identifications

All target compound identifications were within validation criteria for samples on which EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by EPA Level III criteria.

XI. Compound Quantitation and CRQLs

All compound quantitation and CRQLs were within validation criteria for samples on which EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by EPA Level III criteria.

XII. System Performance

The system performance was acceptable for samples on which EPA Level IV review was performed. Raw data were not evaluated for the samples reviewed by EPA Level III criteria.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

BRC Tronox Parcel G
Dioxins/Dibenzofurans - Data Qualification Summary - SDG F8F120167

SDG	Sample	Compound	Flag	A or P	Reason
F8F120167	TSB-GJ-08-10 TSB-GJ-08-20** TSB-GJ-08-30** TSB-GJ-08-40	1,2,3,7,8,9-HxCDD OCDD	J+ (all detects) J+ (all detects)	P	Laboratory control samples (%R)
F8F120167	TSB-GJ-08-20** TSB-GJ-08-40	OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P	Internal standards (%R)
F8F120167	TSB-GJ-08-30**	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P	Internal standards (%R)

BRC Tronox Parcel G
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG F8F120167

No Sample Data Qualified in this SDG

LDC #: 19097B21 **VALIDATION COMPLETENESS WORKSHEET** Date: 7/19/08
SDG #: F8F120167 Level III/IV Page: 1 of 1
Laboratory: Test America Reviewer: K
2nd Reviewer:

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/11/08
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	
IV.	Routine calibration/~~ICV~~ CCV	A	
V.	Blanks	A	
VI.	Matrix spike/Matrix spike duplicates	N	client specified
VII.	Laboratory control samples	SW	LCS
VIII.	Regional quality assurance and quality control	N	
IX.	Internal standards	SW	
X.	Target compound identifications	A	Not reviewed for Level III validation.
XI.	Compound quantitation and CRQLs	A	Not reviewed for Level III validation.
XII.	System performance	A	Not reviewed for Level III validation.
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	N	
XV.	Field blanks	ND	R= RINSATE 1 (F8F120137)

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: ** Indicates sample underwent Level IV validation

Soil

1	TSB-GJ-08-10	11	8170493MB	21		31	
2	TSB-GJ-08-20**	12		22		32	
3	TSB-GJ-08-30**	13		23		33	
4	TSB-GJ-08-40	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 #: 19097B21
SDG #: F8F120167

VALIDATION FINDINGS CHECKLIST

Reviewer: M
2nd Reviewer: A

Method: Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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				
Was PFK exact mass 380.9760 verified?	✓			
Were the retention time windows established for all homologues?	✓			
Was the chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomers ≤ 25% ?	✓			
Is the static resolving power at least 10,000 (10% valley definition)?	✓			
Was the mass resolution adequately check with PFK?	✓			
Was the presence of 1,2,8,9-TCDD and 1,3,4,6,8-PeCDF verified?	✓			
III. Initial calibration				
Was the initial calibration performed at 5 concentration levels?	✓			
Were all percent relative standard deviations (%RSD) ≤ 20% for unlabeled standards and ≤ 30% for labeled standards?	✓			
Did all calibration standards meet the Ion Abundance Ratio criteria?	✓			
Was the signal to noise ratio for each target compound ≥ 2.5 and for each recovery and internal standard ≥ 10?	✓			
IV. Continuing calibration				
Was a routine calibration performed at the beginning and end of each 12 hour period?	✓			
Were all percent differences (%D) ≤ 20% for unlabeled standards and ≤ 30% for labeled standards?	✓			
Did all routine calibration standards meet the Ion Abundance Ratio criteria?	✓			
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank performed for each matrix and concentration?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet?		✓		
VI. 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.		✓		
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?			✓	
VII. Laboratory control samples				
Was an LCS analyzed for this SDG?	✓			

LDC #: 19097B21
SDG #: F8F120167

VALIDATION FINDINGS CHECKLIST

Reviewer: JR
2nd Reviewer: JR

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?		✓		
VIII. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?			✓	
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
IX. Internal standards				
Were internal standard recoveries within the 40-135% criteria?		✓		
Was the minimum S/N ratio of all internal standard peaks $\geq$ 10?	✓			
X. Target compound identification				
For 2,3,7,8 substituted congeners with associated labeled standards, were the retention times of the two quantitation peaks within -1 to 3 sec. of the RT of the labeled standard?			✓	
For 2,3,7,8 substituted congeners without associated labeled standards, were the relative retention times of the two quantitation peaks within 0.005 time units of the RRT measured in the routine calibration?			✓	
For non-2,3,7,8 substituted congeners, were the retention times of the two quantitation peaks within RT established in the performance check solution?			✓	
Did compound spectra contain all characteristic ions listed in the table attached?			✓	
Was the Ion Abundance Ratio for the two quantitation ions within criteria?			✓	
Was the signal to noise ratio for each target compound and labeled standard $\geq$ 2.5?			✓	
Does the maximum intensity of each specified characteristic ion coincide within $\pm$ 2 seconds (includes labeled standards)?			✓	
For PCDF identification, was any signal (S/N $\geq$ 2.5, at $\pm$ seconds RT) detected in the corresponding PCDPE channel?			✓	
Was an acceptable lock mass recorded and monitored?			✓	
XI. 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?	✓			
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.		✓		

LDC #: 19097B21
SDG #: F8F120167

VALIDATION FINDINGS CHECKLIST

Reviewer: K
2nd Reviewer: A

Validation Area	Yes	No	NA	Findings/Comments
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: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

A. 2,3,7,8-TCDD	F. 1,2,3,4,6,7,8-HpCDD	K. 1,2,3,4,7,8-HxCDF	P. 1,2,3,4,7,8,9-HpCDF	U. Total HpCDD
B. 1,2,3,7,8-PeCDD	G. OCDD	L. 1,2,3,6,7,8-HxCDF	Q. OCDF	V. Total TCDF
C. 1,2,3,4,7,8-HxCDD	H. 2,3,7,8-TCDF	M. 2,3,4,6,7,8-HxCDF	R. Total TCDD	W. Total PeCDF
D. 1,2,3,6,7,8-HxCDD	I. 1,2,3,7,8-PeCDF	N. 1,2,3,7,8,9-HxCDF	S. Total PeCDD	X. Total HxCDF
E. 1,2,3,7,8,9-HxCDD	J. 2,3,4,7,8-PeCDF	O. 1,2,3,4,6,7,8-HpCDF	T. Total HxCDD	Y. Total HpCDF

Notes: _____

LDC #: 19097321
SDG #: F8F120167

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

Page: 1 of 1
Reviewer: n
2nd Reviewer: Q

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)
Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

(Y) N N/A Was a LCS required?
(Y) ~~N N/A~~ Was a LCS analyzed every 20 samples for each matrix or whenever a sample extraction was performed?
Y (N) N/A Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?

#	Date	Lab ID/Reference	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		8170493LCS	E	137 (71-129)	( )	( )	All, blk	J dets/P
			G	~~308~~ (74-144)	( )	( )		↓
				154 ( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC #: 19097B21
SDG #: F8F120167

VALIDATION FINDINGS WORKSHEET
Internal Standards

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)
Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
Y (N) N/A Are all internal standard recoveries were within the 40-135% criteria?
(Y) N N/A Was the S/N ratio all internal standard peaks ≥ 10?

#	Date	Lab ID/Reference	Internal Standard	% Recovery (Limit: 40-135%)	Qualifications
		2	I	37 (40-135)	J/UJ/R (G, Q)
			G	39 (↓)	(O, P, ~~R~~)
				( )	
		3	I	29 ( )	
				( )	
		4	I	26 ( )	
			G	33 (↓)	↓
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

	Internal Standards	Check Standard Used
A.	^{13}C-2,3,7,8-TCDF	
B.	^{13}C-2,3,7,8-TCDD	
C.	^{13}C-1,2,3,7,8-PeCDF	
D.	^{13}C-1,2,3,7,8-PeCDD	
E.	^{13}C-1,2,3,6,7,8-HxCDF	
F.	^{13}C-1,2,3,6,7,8-HxCDD	
G.	^{13}C-1,2,3,4,6,7,8-HpCDF	
H.	^{13}C-1,2,3,4,6,7,8-HpCDD	
I.	^{13}C-OCDD	

	Recovery Standards	Check Standard Used
K.	^{13}C-1,2,3,4-TCDD	
L.	^{13}C-1,2,3,7,8,9-HxCDD	
M.		
N.		
O.		
P.		
Q.		
R.		
T.		

LDC #: 19097B21
SDG #: F8F120167

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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 (Reference Internal Standard)	Reported Average RRF (Initial)	Recalculated Average RRF (Initial)	Reported RRF (CS3 std)	Recalculated RRF (CS3 std)	Reported %RSD	Recalculated %RSD
1	ICAL	6/16/09	2,3,7,8-TCDF (^{13}C-2,3,7,8-TCDF)	0.798	0.798	0.82	0.82	12.5	12.7
			2,3,7,8-TCDD (^{13}C-2,3,7,8-TCDD)	0.913	0.912	0.93	0.93	10.2	10.3
			1,2,3,6,7,8-HxCDD (^{13}C-1,2,3,6,7,8-HxCDD)	0.821	0.820	0.87	0.87	13.9	14.1
			1,2,3,4,6,7,8-HpCDD (^{13}C-1,2,4,6,7,8,-HpCDD)	0.844	0.844	0.88	0.88	12.8	12.7
			OCDF (^{13}C-OCDD)	1.721	1.722	1.86	1.86	16.2	16.3
2			2,3,7,8-TCDF (^{13}C-2,3,7,8-TCDF)						
			2,3,7,8-TCDD (^{13}C-2,3,7,8-TCDD)						
			1,2,3,6,7,8-HxCDD (^{13}C-1,2,3,6,7,8-HxCDD)						
			1,2,3,4,6,7,8-HpCDD (^{13}C-1,2,4,6,7,8,-HpCDD)						
			OCDF (^{13}C-OCDD)						
3			2,3,7,8-TCDF (^{13}C-2,3,7,8-TCDF)						
			2,3,7,8-TCDD (^{13}C-2,3,7,8-TCDD)						
			1,2,3,6,7,8-HxCDD (^{13}C-1,2,3,6,7,8-HxCDD)						
			1,2,3,4,6,7,8-HpCDD (^{13}C-1,2,4,6,7,8,-HpCDD)						
			OCDF (^{13}C-OCDD)						

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 #: 19097B21
SDG #: F8F120167

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

Reviewer: A
2nd Reviewer: A

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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
$RRF = (A_x)(C_{is})/(A_{is})(C_x)$

Where: ave. RRF = initial calibration average RRF
RRF = continuing calibration RRF
A_x = Area of compound, A_{is} = Area of associated internal standard
C_x = Concentration of compound, C_{is} = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Average RRF (initial)	Reported RRF (CC)	Recalculated RRF (CC)	Reported %D	Recalculated %D
1	ST0627B	6/28/08	2,3,7,8-TCDF (^{13}C-2,3,7,8-TCDF)	0.798	0.83	0.83	4.0	4.1
			2,3,7,8-TCDD (^{13}C-2,3,7,8-TCDD)	0.913	0.81	0.81	11.7	11.7
			1,2,3,6,7,8-HxCDD (^{13}C-1,2,3,6,7,8-HxCDD)	0.821	0.87	0.87	6.5	6.4
			1,2,3,4,6,7,8-HpCDD (^{13}C-1,2,4,6,7,8,-HpCDD)	0.844	0.83	0.83	1.5	1.5
			OCDF (^{13}C-OCDD)	1.721	1.58	1.58	8.3	8.3
2	ST0630	6/29/08	2,3,7,8-TCDF (^{13}C-2,3,7,8-TCDF)	0.798	0.85	0.85	5.9	5.9
			2,3,7,8-TCDD (^{13}C-2,3,7,8-TCDD)	0.913	0.82	0.82	10.3	10.3
			1,2,3,6,7,8-HxCDD (^{13}C-1,2,3,6,7,8-HxCDD)	0.821	0.92	0.92	11.6	11.6
			1,2,3,4,6,7,8-HpCDD (^{13}C-1,2,4,6,7,8,-HpCDD)	0.844	0.89	0.89	5.2	5.1
			OCDF (^{13}C-OCDD)	1.721	1.65	1.65	4.3	4.4
3			2,3,7,8-TCDF (^{13}C-2,3,7,8-TCDF)					
			2,3,7,8-TCDD (^{13}C-2,3,7,8-TCDD)					
			1,2,3,6,7,8-HxCDD (^{13}C-1,2,3,6,7,8-HxCDD)					
			1,2,3,4,6,7,8-HpCDD (^{13}C-1,2,4,6,7,8,-HpCDD)					
			OCDF (^{13}C-OCDD)					

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

LDC #: 19097B21
SDG #: F8F120167

VALIDATION FINDINGS WORKSHEET
Laboratory Control Sample Results Verification

Reviewer: M
2nd Reviewer: Q

METHOD: GC/MS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Recovery = 100 * SSC/SA Where: SSC = Spiked sample concentration
SA = Spike added

RPD = | LCS - LCSD | * 2/(LCS + LCSD) LCS = Laboraotry control sample percent recovery LCSD = Laboratory control sample duplicate percent recovery

LCS ID: 8170493LCS

Compound	Spike Added (pg/g)		Spiked Sample Concentration (pg/g)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc	Reported	Recalc	Reported	Recalculated
2,3,7,8-TCDD	20		18.4		92	92				
1,2,3,7,8-PeCDD	100		117		117	117				
1,2,3,4,7,8-HxCDD	↓		102		102	102				
1,2,3,4,7,8,9-HpCDF	↓		103		103	103				
OCDF	200		209		104	105				

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

Ions Monitored for HRGC/HRMS Analysis of PCDDs/PCDFs

Descriptor	Accurate mass[a]	Ion ID	Elemental Composition	Analyte	Descriptor	Accurate Mass[a]	Ion ID	Elemental Composition	Analyte
1	303.9016	M	$C_{12}H_4{}^{35}Cl_4O$	TCDF	4	407.7818	M+2	$C_{12}H^{35}Cl_6{}^{37}ClO$	HpCDF
	305.8987	M+2	$C_{12}H_4{}^{35}Cl_3{}^{37}C10$	TCDF		409.7788	M+4	$C_{12}H^{35}Cl_5{}^{37}Cl_2O$	HpCDF
	315.9419	M	$^{13}C_{12}H_4{}^{35}Cl_4O$	TCDF (S)		417.8250	M	$^{13}C_{12}H^{35}Cl_7O$	HpCDF (S)
	317.9389	M+2	$^{13}C_{12}H_4{}^{35}Cl_3{}^{37}ClO$	TCDF (S)		419.8220	M+2	$^{13}C_{12}H^{35}Cl_6{}^{37}ClO$	HpCDF
	319.8965	M	$C_{12}H_4{}^{35}Cl_4O_2$	TCDD		423.7767	M+2	$C_{12}H^{35}Cl_6{}^{37}ClO_2$	HpCDD
	321.8936	M+2	$C_{12}H_4{}^{35}Cl_3{}^{37}C10_2$	TCDD		425.7737	M+4	$C_{12}H^{35}Cl_5{}^{37}Cl_2O_2$	HpCDD
	331.9368	M	$^{13}C_{12}H_4{}^{35}Cl_4O_2$	TCDD (S)		435.8169	M+2	$^{13}C_{12}H^{35}Cl_6{}^{37}ClO_2$	HpCDD (S)
	333.9338	M+2	$^{13}C_{12}H_4{}^{35}Cl_3{}^{37}ClO_2$	TCDD (S)		437.8140	M+4	$^{13}C_{12}H^{35}Cl_5{}^{37}Cl_2O_2$	HpCDD (S)
	375.8364	M+2	$C_{12}H_4{}^{35}Cl_5{}^{37}ClO$	HxCDPE		479.7165	M+4	$C_{12}H^{35}Cl_7{}^{37}Cl_2O$	NCDPE
	[354.9792]	LOCK	C_9F_{13}	PFK		[430.9728]	LOCK	C_9F_{17}	PFK
2	339.8597	M+2	$C_{12}H_3{}^{35}Cl_4{}^{37}ClO$	PeCDF	5	441.7428	M+2	$C_{12}{}^{35}Cl_7{}^{37}ClO$	OCDF
	341.8567	M+4	$C_{12}H_3{}^{35}Cl_3{}^{37}Cl_2O$	PeCDF		443.7399	M+4	$C_{12}{}^{35}Cl_6{}^{37}Cl_2O$	OCDF
	351.9000	M+2	$^{13}C_{12}H_3{}^{35}Cl_4{}^{37}C10$	PeCDF (S)		457.7377	M+2	$C_{12}{}^{35}Cl_7{}^{37}ClO_2$	OCDD
	353.8970	M+4	$^{13}C_{12}H_3{}^{35}Cl_3{}^{37}Cl_2O$	PeCDF (S)		459.7348	M+4	$C_{12}{}^{35}Cl_6{}^{37}Cl_2O_2$	OCDD
	355.8546	M+2	$C_{12}H_3{}^{35}Cl_4{}^{37}ClO_2$	PeCDD		469.7780	M+2	$^{13}C_{12}{}^{35}Cl_7{}^{37}ClO_2$	OCDD (S)
	357.8516	M+4	$C_{12}H_3{}^{35}Cl_3{}^{37}Cl_2O_2$	PeCDD		471.7750	M+4	$^{13}C_{12}{}^{35}Cl_6{}^{37}Cl_2O_2$	OCDD (S)
	367.8949	M+2	$^{13}C_{12}H_3{}^{35}Cl_4{}^{37}ClO_2$	PeCDD (S)		513.6775	M+4	$C_{12}{}^{35}Cl_8{}^{37}Cl_2O$	DCDPE
	369.8919	M+4	$^{13}C_{12}H_3{}^{35}Cl_3{}^{37}Cl_2O_2$	PeCDD (S)		[422.9278]	LOCK	$C_{10}F_{17}$	PFK
	409.7974	M+2	$C_{12}H_3{}^{35}Cl_6{}^{37}ClO$	HpCDPE					
	[354.9792]	LOCK	C_9F_{13}	PFK					
3	373.8208	M+2	$C_{12}H_2{}^{35}Cl_5{}^{37}ClO$	HxCDF					
	375.8178	M+4	$C_{12}H_2{}^{35}Cl_4{}^{37}Cl_2O$	HxCDF					
	383.8639	M	$^{13}C_{12}H_2{}^{35}Cl_6O$	HxCDF (S)					
	385.8610	M+2	$^{13}C_{12}H_2{}^{35}Cl_5{}^{37}ClO$	HxCDF (S)					
	389.8156	M+2	$C_{12}H_2{}^{35}Cl_5{}^{37}ClO_2$	HxCDD					
	391.8127	M+4	$C_{12}H_2{}^{35}Cl_4{}^{37}Cl_2O_2$	HxCDD					
	401.8559	M+2	$^{13}C_{12}H_2{}^{35}Cl_5{}^{37}ClO_2$	HxCDD (S)					
	403.8529	M+4	$^{13}C_{12}H_2{}^{35}Cl_4{}^{37}Cl_2O_2$	HxCDD (S)					
	445.7555	M+4	$C_{12}H_2{}^{35}Cl_6{}^{37}Cl_2O$	OCDPE					
	[430.9728]	LOCK	C_9F_{17}	PFK					

(a) The following nuclidic masses were used:

H = 1.007825	O = 15.994915
C = 12.000000	^{35}Cl = 34.968853
^{13}C = 13.003355	^{37}Cl = 36.965903
F = 18.9984	

S = internal/recovery standard

LDC #: 19097B21
SDG #: F8F120167

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
Reviewer: K
2nd reviewer: 9

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

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).

RRF = Relative Response Factor (average) from the initial calibration

Df = Dilution Factor.

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

Example:

Sample I.D. 23 , ND :

Conc. = ( ) ( ) ( ) / ( ) ( ) ( )( )

=

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