

**Laboratory Data Consultants, Inc.
Data Validation Report**

Project/Site Name: Tronox LLC Facility, 2008 Phase B Investigation,
Henderson, Nevada

Collection Date: July 10 through July 11, 2008

LDC Report Date: September 10, 2009

Matrix: Soil

Parameters: Dioxins/Dibenzofurans

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): E0800661

Sample Identification

RSAJ8-0.5B
RSAI7-0.5B
RSAJ8-0.5BDL
RSAI7-0.5BDL

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 the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and 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.

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

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. 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%.

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.

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 with the following exceptions:

Date	Compound	%D	Associated Samples	Affected Compound	Flag	A or P
7/23/08	¹³ C-1,2,3,7,8-PeCDD ¹³ C-OCDD ¹³ C-1,2,3,7,8-PeCDF	43.69 49.67 39.28	EQ0800299-01	1,2,3,7,8-PeCDD OCDD 1,2,3,7,8-PeCDF	J- (all detects) UJ (all non-detects)	P

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 with the following exceptions:

Method Blank ID	Extraction Date	Compound	Concentration	Associated Samples
EQ0800294-01	7/14/08	1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF Total PeCDD Total HpCDD Total TCDF Total PeCDF Total HxCDF Total HpCDF	0.265 ng/Kg 1.10 ng/Kg 0.581 ng/Kg 0.276 ng/Kg 0.340 ng/Kg 0.229 ng/Kg 0.405 ng/Kg 0.177 ng/Kg 0.796 ng/Kg 0.0845 ng/Kg 0.547 ng/Kg 2.13 ng/Kg 1.67 ng/Kg 1.14 ng/Kg 0.603 ng/Kg	RSAI7-0.5B RSAI7-0.5BDL
EQ0800299-01	7/16/08	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF OCDF Total HpCDD Total HpCDF	1.1004 ng/Kg 6.9141 ng/Kg 1.750 ng/Kg 4.050 ng/Kg 1.349 ng/Kg 1.750 ng/Kg	RSAJ8-0.5B

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

No field blanks were identified in this SDG.

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
EQ0800299-03LCS	2,3,7,8-TCDD 1,2,3,4,6,7,8-HpCDF	144 (87-135) 144 (91-131)	RSAJ8-0.5B EQ0800299-01	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
RSAJ8-0.5B	¹³ C-OCDD	38 (40-135)	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
RSAI7-0.5B	¹³ C-2,3,7,8-TCDF ¹³ C-1,2,3,4,7,8-HxCDF ¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD	12 (40-135) 25 (40-135) 27 (40-135) 15 (40-135) 20 (40-135) 12 (40-135)	2,3,7,8-TCDF 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF Total HxCDD Total HpCDD Total TCDF Total HxCDF Total HpCDF	J (all detects) UJ (all non-detects)	P
RSAI7-0.5BDL	¹³ C-2,3,7,8-TCDF ¹³ C-1,2,3,4,7,8-HxCDF ¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD	16 (40-135) 24 (40-135) 30 (40-135) 17 (40-135) 23 (40-135) 11 (40-135)	2,3,7,8-TCDF 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF Total HxCDD Total HpCDD Total TCDF Total HxCDF Total HpCDF	J (all detects) UJ (all non-detects)	P
EQ0800299-01	¹³ C-2,3,7,8-TCDF ¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDF ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,4,7,8-HxCDF ¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD	10.61 (40-135) 11.53 (40-135) 12.27 (40-135) 12.28 (40-135) 10.12 (40-135) 11.00 (40-135) 10.20 (40-135) 11.23 (40-135) 9.32 (40-135)	All TCL compounds	J (all detects) UJ (all non-detects)	P

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

The overall assessment of data was acceptable. In the case where more than one result was reported for an individual sample, the least technically acceptable results were rejected as follows:

Sample	Compound	Flag	A or P
RSAJ8-0.5B	2,3,7,8-TCDF from both DB-5 and DB-225	X	A
RSAI7-0.5B	All TCL compounds	X	A
RSAI7-0.5BDL	2,3,7,8-TCDF from DB-5	X	A

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2008 Phase B Investigation, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG E0800661**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
E0800661	RSAJ8-0.5B	2,3,7,8-TCDD 1,2,3,4,6,7,8-HpCDF	J+ (all detects) J+ (all detects)	P	Laboratory control samples (%R) (l)
E0800661	RSAJ8-0.5B	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
E0800661	RSAI7-0.5B RSAI7-0.5BDL	2,3,7,8-TCDF 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF Total HxCDD Total HpCDD Total TCDF Total HxCDF Total HpCDF	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
E0800661	RSAJ8-0.5B	2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF	J (all detects) J (all detects) J (all detects) J (all detects)	A	Project Quantitation Limit (e)
E0800661	RSAI7-0.5B	2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF	J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects)	A	Project Quantitation Limit (e)

SDG	Sample	Compound	Flag	A or P	Reason (Code)
E0800661	RSAI7-0.5BDL	2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF	J (all detects) J (all detects) J (all detects) J (all detects) J (all detects)	A	Project Quantitation Limit (e)
E0800661	RSAJ8-0.5B RSAI7-0.5B RSAJ8-0.5BDL RSAI7-0.5BDL	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
E0800661	RSAJ8-0.5B RSAI7-0.5B RSAJ8-0.5BDL RSAI7-0.5BDL	All compounds reported as EMPC	JK (all detects)	A	Project Quantitation Limit (k)
E0800661	RSAJ8-0.5B	2,3,7,8-TCDF from both DB-5 and DB-225	X	A	Overall assessment of data (o)
E0800661	RSAI7-0.5B	All TCL compounds	X	A	Overall assessment of data (o)
E0800661	RSAI7-0.5BDL	2,3,7,8-TCDF from DB-5	X	A	Overall assessment of data (o)

**Tronox LLC Facility, 2008 Phase B Investigation, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG E0800661**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2008 Phase B Investigation, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG E0800661**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 21257U21

SDG #: E0800661

Laboratory: Columbia Analytical Services

Stage 2B

Date: 8/4/09

Page: 1 of 1

Reviewer: [Signature]

2nd Reviewer: [Signature]

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: 7/10-11/08
II.	HRGC/HRMS instrument performance check	A	
III.	Initial calibration	A	
IV.	Routine calibration/ICV	AMW	
V.	Blanks	AMW	
VI.	Matrix spike/Matrix spike duplicates	N	
VII.	Laboratory control samples	AMW	LOS
VIII.	Regional quality assurance and quality control	N	
IX.	Internal standards	AMW	
X.	Target compound identifications	N	
XI.	Compound quantitation and CRQLs	AMW	
XII.	System performance	N	
XIII.	Overall assessment of data	AMW	
XIV.	Field duplicates	N	
XV.	Field blanks	N	

Note: A = Acceptable
N = Not provided/applicable
SW = See worksheet

ND = No compounds detected
R = Rinsate
FB = Field blank

D = Duplicate
TB = Trip blank
EB = Equipment blank

Validated Samples:

1	1	RSAJ8-0.5B	11 ⁵	EA0800294-01	21 ¹	U129088	31	U1290T2
2 ³	2	RSAI7-0.5B	12	EA0800299-01	22 ¹	C15311#2	32	
3 ²	3	RSAI8-0.5B DL	13		23 ²	C15322#2	33	
4 ⁴	4	RSAI7-0.5B DL	14		24 ³	U129088	34	
5	5		15		25 ^A	U217360	35	
6	6		16		26 ⁵	U216848	36	
7	7		17		27		37	
8	8		18		28		38	
9	9		19		29		39	
10	10		20		30		40	

Notes: _____

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:

VALIDATION FINDINGS WORKSHEET
Blanks

LDC #: 2/257/2
SDG #: See above

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

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

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 method blank?
- N N/A Was a method blank analyzed for each matrix?
- N N/A Was the blank contaminated? If yes, please see qualification below.

Blank extraction date: 7/14/08 **Blank analysis date:** 7/18/08

Conc. units: ng/g **Associated Samples:** 2, 4 (>5x)

Compound	Blank ID	Sample Identification
	5A0800294.01	
F	0.265	
G	1.10	
H	0.581	
I	0.276	
K	0.340	
L	0.229	
O	0.405	

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

Compound	Blank ID	Sample Identification
F	0.177	
G	0.796	
S	0.0875	
U	0.5747	
V	2.213	
W	1.67	
X	1.14	

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

