

LABORATORY DATA CONSULTANTS, INC.

7750 El Camino Real, Suite 2L Carlsbad, CA 92009 Phone: 760/634-0437 Fax: 760/634-0439

Northgate Environmental Management, Inc.
1100 Quail Street Ste. 102
New Port beach, CA 92660
ATTN: Ms. Cindy Arnold

September 18, 2009

SUBJECT: Tronox LLC Facility, 2008 Phase B Investigation, Henderson, Nevada
Data Validation

Dear Ms. Arnold,

Enclosed are the revised data validation reports for the fractions listed below. Please replace the previously submitted report with the enclosed revised report.

LDC Project # 21257:

SDG #

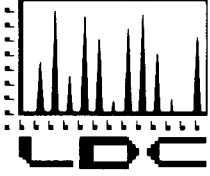
Fraction

R2844538, R2844650, R2844768, R2844797, R2844803, K0805722	Volatiles, Semivolatiles, Chlorinated Pesticides, Metals, Wet Chemistry
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Please feel free to contact us if you have any questions.

Sincerely,

Erlinda T. Rauto
Operations Manager/Senior Chemist



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7750 El Camino Real, Suite 2L Carlsbad, CA 92009 Phone: 760/634-0437 Fax: 760/634-0439

Northgate Environmental Management, Inc.
1100 Quail Street Ste. 102
New Port beach, CA 92660
ATTN: Ms. Cindy Arnold

September 8, 2009

SUBJECT: Tronox LLC Facility, 2008 Phase B Investigation, Henderson, Nevada
Data Validation

Dear Ms. Arnold,

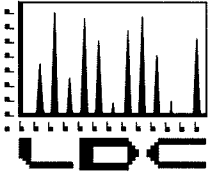
Enclosed are the final validation reports for the fractions listed below. These SDGs were received on August 3, 2009. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 21257:

<u>SDG #</u>	<u>Fraction</u>
R2844538, R2844650, R2844666 R2844768, R2844797, R2844803 R2844862, R2844866, R2844885 R2844902, R2844922, R2845025 E0800616, E0800626, R0800632 E0800639, E0800640, E0800645 E0800646, E0800649, E0800661 E0800662, K0805394 ,K0805722 K0805780, K0805919	Volatiles, Semivolatiles, Chlorinated Pesticides, Polychlorinated Biphenyls, Polychlorinated Biphenyls as Congeners, Metals, Wet Chemistry, Gasoline Range Organics, TPH as Extractables, Dioxins/Dibenzofurans

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

- Standard Operating Procedures (SOP) 40, Data Review/Validation, BRC 2009
- Quality Assurance Project Plan Tronox LLC Facility, Henderson Nevada, June 2009
- NDEP Guidance, May 2006
- USEPA, Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review, June 2008
- USEPA, Contract Laboratory Program National Functional Guidelines for Inorganic Data Review, October 2004
- USEPA, Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Diobenzofurans Data Review, September 2005



- 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,

A handwritten signature in cursive script that reads 'E. Rauto'.

Erlinda T. Rauto
Operations Manager/Senior Chemist

Stage 2B/4 EDD LDC #21257 (Tronox LLC-Northgate, Henderson NV / Tronox Phase B 2008)

LDC	SDG#	DATE REC'D	(3) DATE DUE	VOA (8260B)		SVOA (9270C)		Pest. (8081A)		PCBs (8082)		PCB Cong. (1668A)		Metals (SW846)		Diss. Metals (SW846)		GRO (8015B)		TPH-E (8015B)		Dioxins (8290)		W S		W S		W S		W S				
				W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S			
Matrix: Water/Soil																																		
A	R2844538	08/03/09	09/04/09	16	0	13	0	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
B	R2844650	08/03/09	09/04/09	35	0	22	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
C	R2844666	08/03/09	09/04/09	2	18	0	12	0	15	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
D	R2844768	08/03/09	09/04/09	9	0	5	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
E	R2844797	08/03/09	09/04/09	0	13	0	12	0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
F	R2844803	08/03/09	09/04/09	8	0	5	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
G	R2844862	08/03/09	09/04/09	2	14	0	14	0	16	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
H	R2844866	08/03/09	09/04/09	21	0	13	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
I	R2844885	08/03/09	09/04/09	2	23	0	19	0	11	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
J	R2844902	08/03/09	09/04/09	2	19	0	20	0	18	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
K	R2844922	08/03/09	09/04/09	2	29	0	28	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
L	R2845025	08/03/09	09/04/09	0	1	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
M	E0800616	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
N	E0800626	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
O	E0800632	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
P	E0800639	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Q	E0800640	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
R	E0800645	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
S	E0800646	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
T	E0800649	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
U	E0800661	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
V	E0800662	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
W	K0805394	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
X	K0805722	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Y	K0805780	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Z	K0805919	08/03/09	09/04/09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	T/LR			99	117	58	107	61	93	0	32	0	27	32	13	4	0	16	0	97	0	13	0	0	0	0	0	0	0	0	0	0	0	769

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

EDD CHECKLIST

LDC #: 21257

SDG #: R2844538, R2844650, R2844666, R2844768, R2844797, R2844803, R2844860, R2844866, R2844885, R2844902, R2844922, R2845025, E0800616, E0800626, E0800632, E0800639, E0800640, E0800645, E0800646, E0800649, E0800661, E0800662, K0805394, K0805722, K0805780, K0805919

Tronox Northgate Henderson Worksheet

EDD Area	Yes	No	NA	Findings/Comments
I. Completeness				
Is there an EDD for the associated Tronox validation report?	X			
II. EDD Qualifier Population				
Were all qualifiers from the validation report populated into the EDD?	X			
III. EDD Lab Anomalies				
Were EDD anomalies identified?	X			
If yes, were they corrected or documented for the client?	X			See EDD_discrepancy_form_LDC21257_090809.doc
IV. EDD Delivery				
Was the final EDD sent to the client?	X			