

**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 is the revised data validation report for the fraction listed below. Please replace the previously submitted report with the enclosed revised report.

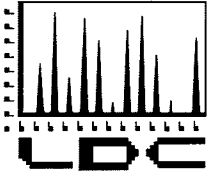
**LDC Project # 21258:**

<b><u>SDG #</u></b>	<b><u>Fraction</u></b>
K0806275	Wet Chemistry

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

Sincerely,

Erlinda T. Rauto  
Operations Manager/Senior Chemist



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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 # 21258:**

**SDG #**

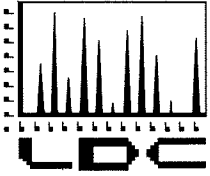
**Fraction**

K0806117, K0806119, K0806216  
K0806221, K0806275, K0806357  
K0806358, K0806534, 211141  
210521, 211060, 211143, 211412  
211468, 211899, 211947, 211948  
040814617, 040815042 040815201

Metals, Wet Chemistry, Radium-226 &  
Radium-228, Isotopic Uranium &  
Isotopic Thorium, Asbestos

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 Inorganic Data Review, October 2004
- Multi Agency Radiological Laboratory Analytical Protocols (MARLAP) Manual, July 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

Stage 2B/4 EDD LDC #21258 (Tronox LLC-Northgate, Henderson NV / Tronox Phase B 2008)

LDC	SDG#	DATE REC'D	(3) DATE DUE	Metals (SW846)		Chlorate (300.1 /9056)		CLO4 (314.0)		Ra-226 (903.1)		Ra-228 (904.0)		Iso. Th (300)		Iso. U (300)		Asbestos		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	W	S	W	S	W	S	W	S				
Matrix: Water/Soil																																					
A	K0806117	08/03/09	09/04/09	0	10	0	10	0	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
B	K0806119	08/03/09	09/04/09	5	0	5	0	5	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
C	K0806216	08/03/09	09/04/09	0	14	0	14	0	14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
D	K0806221	08/03/09	09/04/09	11	0	11	0	11	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
E	K0806275	08/03/09	09/04/09	0	19	0	19	0	19	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
F	K0806357	08/03/09	09/04/09	0	23	0	23	0	23	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
G	K0806358	08/03/09	09/04/09	0	18	0	18	0	18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
H	K0806534	08/03/09	09/04/09	0	2	0	2	0	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
I	211141	08/03/09	09/04/09	-	-	-	-	-	-	0	21	0	21	0	20	0	20	0	20	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
J	210521	08/03/09	09/04/09	-	-	-	-	-	-	20	0	20	0	20	0	20	0	20	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
K	211060	08/03/09	09/04/09	-	-	-	-	-	-	0	16	0	16	0	16	0	16	0	16	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
L	211143	08/03/09	09/04/09	-	-	-	-	-	-	20	0	20	0	20	0	20	0	20	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
M	211412	08/03/09	09/04/09	-	-	-	-	-	-	0	20	0	20	0	20	0	20	0	20	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N	211468	08/03/09	09/04/09	-	-	-	-	-	-	12	0	12	0	12	0	12	0	12	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
O	211899	08/03/09	09/04/09	-	-	-	-	-	-	0	20	0	20	0	20	0	20	0	20	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P	211947	08/03/09	09/04/09	-	-	-	-	-	-	0	11	0	11	0	11	0	11	0	11	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Q	211948	08/03/09	09/04/09	-	-	-	-	-	-	0	12	0	12	0	12	0	12	0	12	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
R	040814617	08/03/09	09/04/09	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
S	040815042	08/03/09	09/04/09	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
T	040815201	08/03/09	09/04/09	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	36	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Total				16	86	16	86	16	86	52	100	52	100	52	99	52	99	52	99	0	66	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	978

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 #: 21258

SDG #: K0806117, K0806119, K0806216, K0806221, K0806275, K0806357, K0806358, K0806534, 211141, 210521, 211060, 211143, 211412, 211468, 211899, 211947, 211948, 040814617, 040815042, 040815201

Tronox Northgate Henderson Worksheet

EDD Area	Yes	No	NA	Findings/Comments
<b>I. Completeness</b>				
Is there an EDD for the associated Tronox validation report?	X			
<b>II. EDD Qualifier Population</b>				
Were all qualifiers from the validation report populated into the EDD?	X			
<b>III. EDD Lab Anomalies</b>				
Were EDD anomalies identified?	X			
If yes, were they corrected or documented for the client?	X			See EDD_discrepancy_form_LDC21258_090809.doc
<b>IV. EDD Delivery</b>				
Was the final EDD sent to the client?	X			