

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Data Validation Reports
LDC #21991**

Chlorinated Pesticides

LDC

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation,
Henderson, Nevada

Collection Date: August 3 through August 4, 2009

LDC Report Date: December 1, 2009

Matrix: Water

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0904290

Sample Identification

M-31AB
M-50B
M-21B
FB080409-GW

Introduction

This data review covers 4 water 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 the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single compounds were performed for the primary (quantitation) column and confirmation column as required by this method.

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

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

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

V. Blanks

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

Sample FB080409-GW was identified as a field blank. No chlorinated pesticide contaminants were found in this blank.

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there were no matrix spike (MS) and matrix spike duplicate (MSD) analyses specified for the samples in this SDG, and therefore matrix spike and matrix spike duplicate analyses were not performed for this SDG.

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Pesticide Cleanup Checks

a. Florisil Cartridge Check

Florisil cleanup was not required and therefore not performed in this SDG.

b. GPC Calibration

GPC cleanup was not required and therefore not performed in this SDG.

XI. Target Compound Identification

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0904290	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG R0904290**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0904290	M-31AB M-50B M-21B FB080409-GW	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG R0904290**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG R0904290**

No Sample Data Qualified in this SDG

LDC #: 21991A3a
 SDG #: R0904290
 Laboratory: Columbia Analytical Services

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
 Stage 2B

Date: 11/25/09
 Page: 1 of 1
 Reviewer: *[Signature]*
 2nd Reviewer: *[Signature]*

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: 8/03-04/09
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	CV/ICV ≤ 20%
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	N	Client spec
VIII.	Laboratory control samples	A	LCS 10
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	N	
XV.	Field blanks	ND	FB = 4

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

Validated Samples: *Water*

1	M-31AB	11	21	31
2	M-50B	12	22	32
3	M-21B	13	23	33
4	FB080409-GW	14	24	34
5	<i>92923-16502-MB</i>	15	25	35
6	<i>92924-MB</i>	16	26	36
7		17	27	37
8		18	28	38
9		19	29	39
10		20	30	40

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation,
Henderson, Nevada

Collection Date: September 3, 2009

LDC Report Date: December 6, 2009

Matrix: Soil/Water

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905072

Sample Identification

SA58-0.5B	SA204009-10BMS
SA58-0.5BDL	SA204009-10BMSD
SA58-10B	
SA58009-28B	
SA58-28B	
SA106-12B	
SA106-20B	
SA106-35B	
RSAU7-0.5B	
RSAU7009-0.5B	
RSAU7-10B	
RSAU7-25B	
RSAU7-40B	
RSAU7-54B	
SA204-0.5B	
SA204-10B	
SA204009-10B	
SA204-30B	
SA204-45B	
EB090309-SO2	

Introduction

This data review covers 21 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 8081A for Chlorinated Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single compounds were performed for the primary (quantitation) column and confirmation column as required by this method.

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

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

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

V. Blanks

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

Sample EB090309-SO2 was identified as an equipment blank. No chlorinated pesticide contaminants were found in this blank.

Samples FB072909-SO (from SDG R0904226) and FB080309-SO and FB080309-SORE (both from SDG R0904279) were identified as field blanks. No chlorinated pesticide contaminants were found in these blanks with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	alpha-BHC	0.092 ug/L	SA58-0.5B SA58-0.5BDL SA58-10B SA58009-28B SA58-28B SA106-12B SA106-20B SA106-35B

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

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	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
SA58-0.5B	Not specified	Decachlorobiphenyl	264 (40-140)	All TCL compounds	J+ (all detects)	A

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 recoveries (%R) and relative percent difference (RPD) were not within QC limits for some compounds, the MS, MSD, LCS, or LCSD 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. Percent recoveries (%R) and relative percent differences (RPD) 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

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All project quantitation limits were within validation criteria with the following exceptions:

Sample	Compound	Finding	Criteria	Flag	A or P
SA58-0.5B	Hexachlorobenzene beta-BHC	Sample result exceeded calibration range.	Reported result should be within calibration range.	J (all detects) J (all detects)	A

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905072	All compounds reported below the PQL.	J (all detects)	A

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
SA58-0.5B	Hexachlorobenzene beta-BHC	X X	A
SA58-0.5BDL	All TCL compounds except Hexachlorobenzene beta-BHC	X	A

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

XIV. Field Duplicates

Samples SA58009-28B and SA58-28B, samples RSAU7-0.5B and RSAU7009-0.5B, and samples SA204-10B and SA204009-10B were identified as field duplicates. No chlorinated pesticides were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	RSAU7-0.5B	RSAU7009-0.5B				
beta-BHC	4.4	3.4	-	1.0 (≤ 1.8)	-	-

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA204-10B	SA204009-10B				
4,4'-DDE	16	11	-	5 (≤ 17)	-	-
4,4'-DDT	18	12	-	6 (≤ 17)	-	-
Hexachlorobenzene	66	52	24 (≤ 50)	-	-	-
beta-BHC	11	8.9	-	2.1 (≤ 9.0)	-	-

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG R0905072**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905072	SA58-0.5B	All TCL compounds	J+ (all detects)	A	Surrogate spikes (%R) (s)
R0905072	SA58-0.5B	Hexachlorobenzene beta-BHC	J (all detects) J (all detects)	A	Project Quantitation Limit (e)
R0905072	SA58-0.5B SA58-0.5BDL SA58-10B SA58009-28B SA58-28B SA106-12B SA106-20B SA106-35B RSAU7-0.5B RSAU7009-0.5B RSAU7-10B RSAU7-25B RSAU7-40B RSAU7-54B SA204-0.5B SA204-10B SA204009-10B SA204-30B SA204-45B EB090309-SO2	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
R0905072	SA58-0.5B	Hexachlorobenzene beta-BHC	X X	A	Overall assessment of data (o)
R0905072	SA58-0.5BDL	All TCL compounds except Hexachlorobenzene beta-BHC	X	A	Overall assessment of data (o)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG R0905072**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Equipment Blank Data Qualification Summary - SDG R0905072**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG R0905072**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21991C3a

VALIDATION COMPLETENESS WORKSHEET

Date: 11/30/09

SDG #: R0905072

Stage 2B

Page: 1 of 1

Laboratory: Columbia Analytical Services

Reviewer: SVG

2nd Reviewer: [Signature]

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: 9/03/09
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	CV/ICV ≤ 20 %
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	A	LCS / D
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	SW	
XIII.	Overall assessment of data	SW	
XIV.	Field duplicates	SW	D ₁ = 4, 5 D ₂ = 9, 10 D ₃ = 16, 17
XV.	Field blanks	SW	*EB = 20 FB = FB 072909 - SO (from R0904206) ↓ = *FB 080309 - SO (from R0904279) ↓ = *FB 080309 - SO RE

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

1	SA58-0.5B	S	11	1	RSAU7-10B	S	21	SA204009-10BMS	S	31	1	95417-MB
2	SA58-0.5BDL		12	1	RSAU7-25B		22	SA204009-10BMSD	↓	32	2	95982-
3	SA58-10B	A	13	1	RSAU7-40B		23			33	3	95631-
4	SA58009-28B	D ₁	14	1	RSAU7-54B		24			34	3	95411-
5	SA58-28B	D ₁	15	3	SA204-0.5B		25			35		
6	SA106-12B		16	3	SA204-10B	D ₃	26			36		
7	SA106-20B		17	3	SA204009-10B	D ₃	27			37		
8	SA106-35B		18	3	SA204-30B		28			38		
9	RSAU7-0.5B	D ₂	19	3	SA204-45B		29			39		
10	RSAU7009-0.5B	D ₁	20	4	EB090309-SO2	W	30			40		

VALIDATION FINDINGS WORKSHEET

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

A. alpha-BHC	I. Dieldrin	Q. Endrin ketone	Y. Aroclor-1242	GG.
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. <i>Hexachlorobenzene</i>	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF.	NN.

Notes: _____

VALIDATION FINDINGS WORKSHEET Field Blanks

METHOD: GC Pesticides/PCBs (EPA SW 846 Method 8081)
 Y/N N/A Field blanks were identified in this SDG.
 Y/N N/A Were target compounds detected in the field blanks?
 Blank units: ug/L Associated sample units: ug/kg
 Sampling date: 7/29/09 (Field Blank) / Rinsate / Other: _____
 Field blank type: (circle one) (Field Blank) / Rinsate / Other: _____

Associated Samples: 1-8 (ND)

Compound	Blank ID	Sample Identification											
A	0.092												
CRQL													

Blank units: _____ Associated sample units: _____
 Sampling date: _____ Associated Samples: _____
 Field blank type: (circle one) Field Blank / Rinsate / Other: _____

Compound	Blank ID	Sample Identification											
CRQL													

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

VALIDATION FINDINGS WORKSHEET

LDC #: 219A1C3A
 SDG #: See Copy

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

Surrogate Spikes

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

Please see qualification below for all questions answered "N". Not applicable questions are identified as "N/A".
 N A Were surrogates spiked into all samples, standards and blanks?
 N A Did all surrogate percent recoveries (%R) meet the QC limits?

#	Date	Sample ID	Column	Surrogate Compound	%R (Limits)	Qualifications
1			Not specified	B	264 (40-140)	JT Acts/A (S)
2		(50A)	↓	A, B	DO	No qual

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

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

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

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
 N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG?
 Y N/A Were a MS/MSD analyzed every 20 samples for each matrix or whenever a sample extraction was performed?
 Y 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
		21/22	L	148 (65-127)	146 (65-127)	() (30)	17	No qual (105/10 m)
			Q	() ()	() ()	() ()		(MS/MSD in)
			EE	() ()	18 (20-150)	() ()		(MS in)
			S	155 (27-131)	() ()	() ()		(MSD in)
			T	205 (78-127)	159 (98-127)	() ()		(105/10 in)
				() ()	() ()	() ()		
				() ()	() ()	() ()		
				() ()	() ()	() ()		
				() ()	() ()	() ()		
				() ()	() ()	() ()		
				() ()	() ()	() ()		
				() ()	() ()	() ()		
				() ()	() ()	() ()		
				() ()	() ()	() ()		
				() ()	() ()	() ()		
				() ()	() ()	() ()		
				() ()	() ()	() ()		

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

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

Y N N/A Were CRQLs adjusted for sample dilutions, dry weight factors, etc.?

Y N N/A Did the reported results for detected target compounds agree within 10.0% of the recalculated results?

#	Compound Name	Finding	Associated Samples	Qualifications
	EE, B	> cal range	1	J dots/A (e)

Comments: See sample calculation verification worksheet for recalculations

LDC #: 7-11-03
 SDG #: Su Cms

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

VALIDATION FINDINGS WORKSHEET I
Overall Assessment of Data

METHOD: GC Pesticides/PCBs (EPA SW846 Method 8081/8082)

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

All available information pertaining to the data were reviewed using professional judgement to compliment the determination of the overall quality of the data.

Y **N** **N/A** Was the overall quality and usability of the data acceptable?

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		1	EE, B > cal range		X/A Co
		2	All except EE, B dil		

Comments:

LDC #: 21991 C3A
 SDG #: Sy Low

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

METHOD: GC Pesticides/PCBs (EPA SW846 Method 8081/8082)

Y N N/A
Y N N/A

Were field duplicate pairs identified in this SDG?
 Were target compounds detected in thie field duplicate pairs?

Compound	Concentration ($\mu\text{g/kg}$)		RPD	Parent only
	9	10		
B	4.4	3.4	1.0 ($\leq 1.8 D$)	-

Compound	Concentration ($\mu\text{g/kg}$)		RPD	Parent only
	16	17		
J	16	11	5 ($\leq 17 D$)	-
O	18	12	6 ↓	-
EE	66	52	24 ($\leq 50\% RPD$)	-
B	11	8.9	2.1 ($\leq 9.0 D$)	-

Compound	Concentration ()		RPD

Compound	Concentration ()		RPD

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation,
Henderson, Nevada

Collection Date: September 9, 2009

LDC Report Date: December 6, 2009

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 4

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905138

Sample Identification

RSAQ5-0.5B
RSAQ5-10B
RSAQ5-25B
RSAQ5-41B
RSAQ5-41BMS
RSAQ5-41BMSD

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 the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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.

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. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single compounds were performed for the primary (quantitation) column and confirmation column as required by this method.

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

Retention time windows were evaluated and considered technically acceptable.

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

Retention times (RT) of all compounds in the calibration standards were within QC limits.

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

V. Blanks

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

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No chlorinated pesticide contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	alpha-BHC	0.092 ug/L	All samples in SDG R0905138

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

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) and relative percent differences (RPD) 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.

XII. Project Quantitation Limit

All project quantitation limits were within validation criteria.

The sample results for detected compounds from the two columns were within 40% relative percent difference (RPD) with the following exceptions:

Sample	Compound	RPD	Flag	A or P
RSAQ5-10B	beta-BHC	53.2	J (all detects)	A

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905138	All compounds reported below the PQL.	J (all detects)	A

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG R0905138**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905138	RSAQ5-10B	beta-BHC	J (all detects)	A	Project Quantitation Limit (RPD) (dc)
R0905138	RSAQ5-0.5B RSAQ5-10B RSAQ5-25B RSAQ5-41B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG R0905138**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG R0905138**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21991E3a

VALIDATION COMPLETENESS WORKSHEET

SDG #: R0905138

Stage 4

Laboratory: Columbia Analytical Services

Date: 11/20/09

Page: 1 of 1

Reviewer: JV

2nd Reviewer: [Signature]

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: <u>9/09/09</u>
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	<u>CCV/ICV ≤ 20%</u>
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	A	
VIII.	Laboratory control samples	A	<u>LCS 1/2</u>
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	A	
XII.	Compound quantitation and reported CRQLs	SW	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	N	
XV.	Field blanks	SW	<u>FB = FB 072909-50 (from R0904226)</u>

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

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

D = Duplicate
 TB = Trip blank
 EB = Equipment blank

Validated Samples:

Soil

1	RSAQ5-0.5B	11	<u>95982-MB</u>	21	31
2	RSAQ5-10B	12		22	32
3	RSAQ5-25B	13		23	33
4	RSAQ5-41B	14		24	34
5	RSAQ5-41BMS	15		25	35
6	RSAQ5-41BMSD	16		26	36
7		17		27	37
8		18		28	38
9		19		29	39
10		20		30	40

LDC #: 21991 E34
 SDG #: Su Croy

VALIDATION FINDINGS CHECKLIST

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

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? <u> </u> %D or <u> </u> %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 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?	/			
Were extract cleanup blanks analyzed with every batch requiring clean-up?	/			
Was there contamination in the method blanks or clean-up blanks? If yes, please see the Blanks validation completeness worksheet.			/	
VI. Surrogate spikes				
Were all surrogate %R within the QC limits?	/			
If the percent recovery (%R) of one or more surrogates was outside QC limits, was a reanalysis performed to confirm %R?			/	
If any %R was less than 10 percent, was a reanalysis performed to confirm %R?			/	
VII. Matrix spike/Matrix spike duplicates				

LDC #: 21991E3a
 SDG #: Su Creek

VALIDATION FINDINGS CHECKLIST

Page: 2 of 2
 Reviewer: JV
 2nd Reviewer: h

Validation Area	Yes	No	NA	Findings/Comments
Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Was a MS/MSD analyzed every 20 samples of each matrix?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
VIII. Laboratory control samples				
Was an LCS analyzed for this SDG?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Was an LCS analyzed per extraction batch?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Were the performance evaluation (PE) samples within the acceptance limits?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
X. Target compound identification				
Were the retention times of reported detects within the RT windows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
XII. System performance				
System performance was found to be acceptable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
XIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
XIV. Field duplicates				
Field duplicate pairs were identified in this SDG.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Target compounds were detected in the field duplicates.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
XV. Field blanks				
Field blanks were identified in this SDG.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Target compounds were detected in the field blanks.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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 #: 21991 E39
 SDG #: See Cmoy
VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

Page: 1 of 1
 Reviewer: AVG
 2nd Reviewer: L

METHOD: GC HPLC

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

Level IV/D Only

- Y N N/A
 Y N N/A
 Y N N/A

Were CRQLs adjusted for sample dilutions, dry weight factors, etc.?

Did the reported results for detected target compounds agree within 10.0% of the recalculated results?

Did the percent difference of detected compounds between two columns/detectors $\leq 40\%$?

If no, please see findings below.

#	Compound Name	Sample ID	<u>%RPD</u> / <u>%D</u> Between Two Columns/Detectors Limit ($\leq 40\%$)	Qualifications
	<u>B</u>	<u>2</u>	<u>53.2</u>	<u>J AETS / A (dc)</u>

Comments: See sample calculation verification worksheet for recalculations

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

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

The calibration factors (CF) and relative standard deviation (%RSD) were recalculated using the following calculations:

CF = A/C
 Average CF = sum of the CF/number of standards
 %RSD = $100 * (S/X)$
 Where: A = Area of compound
 C = Concentration of compound
 S = Standard deviation of calibration factors
 X = Mean of calibration factors

#	Standard ID	Calibration Date	Compound	Reported		Recalculated		Reported		Recalculated	
				CF (10 std)	CF (10 std)	CF (10 std)	CF (10 std)	CF (initial)	CF (initial)	%RSD	%RSD
1	CAL	9/15/09	H (STX-CUP1)	2.213 e7	2.213 e7	2.213 e7	2.213 e7	2.273 e7	2.273 e7	1.88	1.88
			P	9.662 e6	9.662 e6	9.662 e6	9.662 e6	9.748 e6	9.748 e6	1.43	1.43
			H	6.961 e7	6.961 e7	6.961 e7	6.961 e7	6.898 e7	6.897 e7	3.76	3.78
			P	2.642 e7	2.642 e7	2.642 e7	2.642 e7	2.642 e7	2.642 e7	2.85	2.85
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 #: 21991 E74
 SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Page: 1 of 1
 Reviewer: MLC
 2nd Reviewer: [Signature]

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

Percent difference (%D) = $100 * (N - C) / N$ Where: N = Initial Calibration Factor or Nominal Amount (ng)
 C = Calibration Factor from Continuing Calibration Standard or Calculated Amount (ng)

Standard ID	Calibration Date/Time	Compound	Average CF/ CCV Conc	Reported		Recalculated		Reported		Recalculated	
				CF/Conc CCV	CCV	CF/Conc CCV	CCV	%D	%D		
CCV2A	9/16/09	H (STX-CUP)	2.273 e7	22.866 e6	22.865 000	0.6	0.6				
		P	9.748 e6	9.896 e6	9896.500	1.5	1.5				
		H	6.867 e7	70.677	70675.000	2.5	2.5				
		P	2.642 e7	27.080	27080.00	2.5	2.5				
CCV3A	9/17/09	H		22.504 e6	22505.000	1.0	1.0				
		P		9.641	9641.500	1.1	1.1				
		H		68.030	68030.000	1.4	1.4				
		P		26.107	261070.000	1.2	1.2				

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 #: 21991 E 39
 SDG #: Sulmer

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Page: 1 of 1
 Reviewer: DVZ
 2nd reviewer: [Signature]

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

The percent recoveries (%R) of surrogates were recalculated for the compounds identified below using the following calculation:

% Recovery: $SF/SS * 100$

Where: SF = Surrogate Found
 SS = Surrogate Spiked

Sample ID: # 1

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	
Tetrachloro-m-xylene						
Tetrachloro-m-xylene	<u>STX-C41</u>	<u>100</u>	<u>74.94</u>	<u>75</u>	<u>75</u>	<u>0</u>
Decachlorobiphenyl	<u>↓</u>	<u>↓</u>	<u>91.96</u>	<u>91</u>	<u>91</u>	<u>↓</u>
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 #: 7991 E39
 SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

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

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 = $100 \cdot (SSC - SC) / SA$

Where: SSC = Spiked sample concentration
 SA = Spike added

SC = Concentration

RPD = $|MS - MSD| \cdot 2 / (MS + MSD)$

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
gamma-BHC	7.24	7.24	0	4.98	4.95	49	69	68	68	1	1
4,4'-DDT	J	J	1	5.74	5.90	79	79	81	81	3	3
Atoclor 1260											

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 #: 21091571
 SDG #: See below

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

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

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 = $100 \cdot (SSC-SC)/SA$ Where: SSC = Spiked sample concentration SC = Concentration
 SA = Spike added

RPD = $100 \cdot |LCS - LCSD| \cdot 2 / (LCS + LCSD)$ LCS = Laboratory control sample percent recovery LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: 95987 LCS/D

Compound	Spike Added (ug/g)		Spiked Sample Concentration (ug/g)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
gamma-BHC	6.67	6.67	5.45	5.81	82	82	87	87	6	6
4,4'-DDT	↓	↓	4.90	5.04	74	74	76	76	3	3
Aroclor 1260										

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

LDC #: 21991E34
 SDG #: See Conv

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
 Reviewer: SVK
 2nd reviewer: [Signature]

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

Y N N/A
Y N N/A

Were all reported results recalculated and verified for all level IV samples?

Were all recalculated results for detected target compounds agree within 10.0% of the reported results?

Example:

Sample I.D. # 1 EE

$$\text{Conc.} = \frac{(591.3 \mu\text{g}) (10 \text{ ml})}{(3.103 \text{ g}) (70 \text{ g}) (0.921)}$$

= 6.897

≈ 6.9 ug/kg

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

Note: _____

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation,
Henderson, Nevada

Collection Date: September 11, 2009

LDC Report Date: December 1, 2009

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905198

Sample Identification

RSAQ6-0.5B
RSAQ6-10B
RSAQ6-25B
RSAQ6-38B
RSAQ6009-38B

Introduction

This data review covers 5 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 the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single compounds were performed for the primary (quantitation) column and confirmation column as required by this method.

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

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

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

V. Blanks

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

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No chlorinated pesticide contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	alpha-BHC	0.092 ug/L	All samples in SDG R0905198

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

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there were no matrix spike (MS) and matrix spike duplicate (MSD) analyses specified for the samples in this SDG, and therefore matrix spike and matrix spike duplicate analyses were not performed for this SDG.

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Pesticide Cleanup Checks

a. Florisil Cartridge Check

Florisil cleanup was not required and therefore not performed in this SDG.

b. GPC Calibration

GPC cleanup was not required and therefore not performed in this SDG.

XI. Target Compound Identification

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905198	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

Samples RSAQ6-38B and RSAQ6009-38B were identified as field duplicates. No chlorinated pesticides were detected in any of the samples.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG R0905198**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905198	RSAQ6-0.5B RSAQ6-10B RSAQ6-25B RSAQ6-38B RSAQ6009-38B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG R0905198**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG R0905198**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 21991G3a

SDG #: R0905198

Laboratory: Columbia Analytical Services

Stage 2B

Date: 12/01/09

Page: 1 of 1

Reviewer: JVB

2nd Reviewer: [Signature]

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: 9/11/09
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	CV/IV ≤ 20%
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	N	Client spec
VIII.	Laboratory control samples	A	LCS/D
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	ND	D = 4, 5
XV.	Field blanks	SW	FB = FB072909-SO (from R0904220)

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

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

D = Duplicate
TB = Trip blank
EB = Equipment blank

Validated Samples: Soil

1	1	RSAQ6-0.5B	11	95982-MB	21		31	
2	1	RSAQ6-10B	12	96620-1	22		32	
3	✓	RSAQ6-25B	13		23		33	
4	✓	RSAQ6-38B	14		24		34	
5	✓	RSAQ6009-38B	15		25		35	
6			16		26		36	
7			17		27		37	
8			18		28		38	
9			19		29		39	
10			20		30		40	

VALIDATION FINDINGS WORKSHEET

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

A. alpha-BHC	I. Dieldrin	Q. Endrin ketone	Y. Aroclor-1242	GG.
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. <i>Hexachlorobenzene</i>	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF.	NN.

Notes: _____

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

Y/N N/A Field blanks were identified in this SDG.

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

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

Sampling date: 7/25/05

Field blank type: (circle one) Field Blank/Rinsate / Other:

Associated Samples: All (NB)

Compound	Blank ID	Sample Identification				
	FB072909-50					
A	0.092					
CRQL						

Blank units: Associated sample units:

Sampling date: Associated Samples:

Field blank type: (circle one) Field Blank / Rinsate / Other:

Compound	Blank ID	Sample Identification				
CRQL						

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

FBLKASC.3S

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation,
Henderson, Nevada

Collection Date: September 14, 2009

LDC Report Date: December 1, 2009

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905218

Sample Identification

RSAR6-37B
RSAR6-25B
RSAR6-0.5B
RSAR6-9B
RSAO8-43B
RSAO8-11.5B
RSAO8-21.5B
RSAR6-37BMS
RSAR6-37BMSD

Introduction

This data review covers 9 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 the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single compounds were performed for the primary (quantitation) column and confirmation column as required by this method.

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

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

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

V. Blanks

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

Samples FB072909-SO (from SDG R0904226) and FB082809-SO (from SDG R0904894) were identified as field blanks. No chlorinated pesticide contaminants were found in these blanks with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	alpha-BHC	0.092 ug/L	RSAR6-37B RSAR6-25B RSAR6-0.5B RSAR6-9B

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

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) and relative percent differences (RPD) 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

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905218	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG R0905218**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905218	RSAR6-37B RSAR6-25B RSAR6-0.5B RSAR6-9B RSAO8-43B RSAO8-11.5B RSAO8-21.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG R0905218**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG R0905218**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21991H3a

VALIDATION COMPLETENESS WORKSHEET

SDG #: R0905218

Stage 2B

Laboratory: Columbia Analytical Services

Date: 12/11/09

Page: 1 of 1

Reviewer: JG

2nd Reviewer: [Signature]

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: <u>9/14/09</u>
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	<u>CW/1W ≤ 20%</u>
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	A	
VIII.	Laboratory control samples	A	<u>LCS/D</u>
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	N	
XV.	Field blanks	SW	<u>FB = FB072909-50 (from R0904226)</u> <u>↓ = *FB082809-50 (from R0904899)</u>

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

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

D = Duplicate
TB = Trip blank
EB = Equipment blank

Validated Samples: Soil

1	RSAR6-37B	11	<u>96620-MB</u>	21		31	
2	RSAR6-25B	12		22		32	
3	RSAR6-0.5B	13		23		33	
4	RSAR6-9B	14		24		34	
5	RSAO8-43B	15		25		35	
6	RSAO8-11.5B	16		26		36	
7	RSAO8-21.5B	17		27		37	
8	RSAR6-37BMS	18		28		38	
9	RSAR6-37BMSD	19		29		39	
10		20		30		40	

VALIDATION FINDINGS WORKSHEET

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

A. alpha-BHC	I. Dieldrin	Q. Endrin ketone	Y. Aroclor-1242	GG.
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. <i>Hexachlorobenzene</i>	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF.	NN.

Notes: _____

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation,
Henderson, Nevada

Collection Date: September 15 through September 16, 2009

LDC Report Date: December 1, 2009

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905260

Sample Identification

SA136-0.5B
SA136-10B
SA136-25B
SA136-40B
SA128-0.5B
SA128-10B
SA128-29B

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 8081A for Chlorinated Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single compounds were performed for the primary (quantitation) column and confirmation column as required by this method.

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

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

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

V. Blanks

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

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No chlorinated pesticide contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	alpha-BHC	0.092 ug/L	All samples in SDG R0905260

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

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for SA128-0.5B. Since the sample was diluted out, no data were qualified.

VII. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there were no matrix spike (MS) and matrix spike duplicate (MSD) analyses specified for the samples in this SDG, and therefore matrix spike and matrix spike duplicate analyses were not performed for this SDG.

VIII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) 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

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905260	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG R0905260**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905260	SA136-0.5B SA136-10B SA136-25B SA136-40B SA128-0.5B SA128-10B SA128-29B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG R0905260**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG R0905260**

No Sample Data Qualified in this SDG

LDC #: 2199113a
 SDG #: R0905260
 Laboratory: Columbia Analytical Services

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
 Stage 2B

Date: 12/01/09
 Page: 1 of 1
 Reviewer: JG
 2nd Reviewer: [Signature]

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: <u>9/15-16/09</u>
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	<u>COV / CV ≤ 20 %</u>
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	N	<u>Client SPEC</u>
VIII.	Laboratory control samples	A	<u>LCB D</u>
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	N	
XV.	Field blanks	SW	<u>FB = FB072909-50 (from R0904226)</u>

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: Soil

1	SA136-0.5B	11	<u>96620-MB</u>	21		31	
2	SA136-10B	12	<u>96518-</u>	22		32	
3	SA136-25B	13		23		33	
4	SA136-40B	14		24		34	
5	SA128-0.5B	15		25		35	
6	SA128-10B	16		26		36	
7	SA128-29B	17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

VALIDATION FINDINGS WORKSHEET

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

A. alpha-BHC	I. Dieldrin	Q. Endrin ketone	Y. Aroclor-1242	GG.
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. <i>Hexachlorobenzene</i>	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF.	NN.

Notes:

LDC #: 2/19/91 I 34
 SDG #: Submer

VALIDATION FINDINGS WORKSHEET

Surrogate Spikes

Page: 1 of 1
 Reviewer: JVG
 2nd Reviewer:

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

N/A Were surrogates spiked into all samples, standards and blanks?
 N/A Did all surrogate percent recoveries (%R) meet the QC limits?
 Please see qualification below for all questions answered "N". Not applicable questions are identified as "N/A".

#	Date	Sample ID	Column	Surrogate Compound	%R (Limits)	Qualifications
		5	Not specified	A, B	DD (90-140)	No qual

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

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation,
Henderson, Nevada

Collection Date: September 17, 2009

LDC Report Date: December 1, 2009

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905331

Sample Identification

SA165-0.5B
SA165-10B
SA165-28B
SA165-10BMS
SA165-10BMSD

Introduction

This data review covers 5 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 the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single compounds were performed for the primary (quantitation) column and confirmation column as required by this method.

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

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

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

V. Blanks

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

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No chlorinated pesticide contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	alpha-BHC	0.092 ug/L	All samples in SDG R0905331

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

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for SA165-0.5B. Since the sample was diluted out, no data were qualified.

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) and relative percent differences (RPD) 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

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905331	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG R0905331**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905331	SA165-0.5B SA165-10B SA165-28B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG R0905331**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG R0905331**

No Sample Data Qualified in this SDG

LDC #: 21991J3a
 SDG #: R0905331
 Laboratory: Columbia Analytical Services

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET

Stage 2B

Date: 12/01/09
 Page: 1 of 1
 Reviewer: JVG
 2nd Reviewer: JVG

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: 9/17/09
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	CCV/ICV ≤ 20%
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	A	
VIII.	Laboratory control samples	A	LCS/D
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	N	
XV.	Field blanks	SW	FB = FB072909-50 (from R0904220)

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: 501)

1	SA165-0.5B	11	96578-MB	21		31	
2	SA165-10B	12		22		32	
3	SA165-28B	13		23		33	
4	SA165-10BMS	14		24		34	
5	SA165-10BMSD	15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

VALIDATION FINDINGS WORKSHEET

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

A. alpha-BHC	I. Dieldrin	Q. Endrin ketone	Y. Aroclor-1242	GG.
B. beta-BHC	J. 4,4'-DDE	R. Endrin aldehyde	Z. Aroclor-1243	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 606	KK.
F. Aldrin	N. Endosulfan sulfate	V. Aroclor-1016	DD. DB 1701	LL.
G. Heptachlor epoxide	O. 4,4'-DDT	W. Aroclor-1221	EE. Hexachloro benzene	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF.	NN.

Notes:

VALIDATION FINDINGS WORKSHEET
Surrogate Spikes

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

Please see qualification below for all questions answered "N". Not applicable questions are identified as "N/A".
 N N/A Were surrogates spiked into all samples, standards and blanks?
 Y N/A Did all surrogate percent recoveries (%R) meet the QC limits?

#	Date	Sample ID	Column	Surrogate Compound	%R (Limits)	Qualifications
		1 (200X)	Not Specified	A, B	DO (40-140)	No Qual

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

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation,
Henderson, Nevada

Collection Date: September 18, 2009

LDC Report Date: December 1, 2009

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905348

Sample Identification

SA117-0.5B
SA117-9B
SA117-25B
SA117-41B
SA117-9BMS
SA117-9BMMSD

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 the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single compounds were performed for the primary (quantitation) column and confirmation column as required by this method.

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

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

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

V. Blanks

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

Sample FB072909-SO (from SDG R0904226) was identified as a field blank. No chlorinated pesticide contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	alpha-BHC	0.092 ug/L	All samples in SDG R0905348

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

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) and relative percent differences (RPD) 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

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905348	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG R0905348**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905348	SA117-0.5B SA117-9B SA117-25B SA117-41B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG R0905348**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG R0905348**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21991K3a

VALIDATION COMPLETENESS WORKSHEET

SDG #: R0905348

Stage 2B

Laboratory: Columbia Analytical Services

Date: 12/01/09

Page: 1 of 1

Reviewer: JLC

2nd Reviewer: [Signature]

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: <u>9/18/09</u>
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	<u>CCV/ICV ≤ 20 %</u>
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	A	
VIII.	Laboratory control samples	A	<u>LCS/D</u>
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	N	
XV.	Field blanks	SW	<u>FB = FB 072909-SO (from R0904226)</u>

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

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

D = Duplicate
TB = Trip blank
EB = Equipment blank

Validated Samples:

soil

1	SA117-0.5B	11	<u>96518-MB</u>	21		31	
2	SA117-9B	12		22		32	
3	SA117-25B	13		23		33	
4	SA117-41B	14		24		34	
5	SA117-9BMS	15		25		35	
6	SA117-9BMSD	16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

VALIDATION FINDINGS WORKSHEET

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

A. alpha-BHC	I. Dieldrin	Q. Endrin ketone	Y. Aroclor-1242	GG.
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. <i>Hexachloro benzene</i>	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF.	NN.

Notes: _____

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation,
Henderson, Nevada

Collection Date: September 21, 2009

LDC Report Date: December 1, 2009

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905387

Sample Identification

SA66-0.5B
SA66-0.5BDL
SA66009-0.5B
SA66009-0.5BDL
SA66-10B
SA66-10BDL
SA129-10B
SA129-29B
RSAT4-0.5B
RSAT4-10B
RSAT4-25B
RSAT4-40B
RSAT4-53B

Introduction

This data review covers 13 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 the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single compounds were performed for the primary (quantitation) column and confirmation column as required by this method.

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

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds.

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

V. Blanks

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

Samples FB072909-SO (from SDG R0904226) and FB080309-SO and FB080309-SORE (both from SDG R0904279) were identified as field blanks. No chlorinated pesticide contaminants were found in these blanks with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	alpha-BHC	0.092 ug/L	SA66-0.5B SA66-0.5BDL SA66009-0.5B SA66009-0.5BDL SA66-10B SA66-10BDL SA129-10B SA129-29B

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

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for several samples. Since the samples were diluted out, no data were qualified.

VII. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there were no matrix spike (MS) and matrix spike duplicate (MSD) analyses specified for the samples in this SDG, and therefore matrix spike and matrix spike duplicate analyses were not performed for this SDG.

VIII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) 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

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All project quantitation limits were within validation criteria with the following exceptions:

Sample	Compound	Finding	Criteria	Flag	A or P
SA66-0.5B SA66009-0.5B SA66-10B	4,4'-DDE	Sample result exceeded calibration range.	Reported result should be within calibration range.	J (all detects)	A

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905387	All compounds reported below the PQL.	J (all detects)	A

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
SA66-0.5B SA66009-0.5B SA66-10B	4,4'-DDE	X	A
SA66-0.5BDL SA66009-0.5BDL SA66-10BDL	All TCL compounds except 4,4'-DDE	X	A

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

XIV. Field Duplicates

Samples SA66-0.5B and SA66009-0.5B and samples SA66-0.5BDL and SA66009-0.5BDL were identified as field duplicates. No chlorinated pesticides were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA66-0.5B	SA66009-0.5B				
4,4'-DDE	71000	110000	43 (≤ 50)	-	-	-
4,4'-DDT	19000	23000	19 (≤ 50)	-	-	-
Dieldrin	2200	3100	-	900 (≤ 1800)	-	-
Endrin ketone	2800	2100	-	700 (≤ 1800)	-	-
Hexachlorobenzene	4800	5600	15 (≤ 50)	-	-	-
beta-BHC	750	830	-	80 (≤ 930)	-	-

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA66-0.5BDL	SA66009-0.5BDL				
4,4'-DDE	10000	150000	40 (≤ 50)	-	-	-
4,4'-DDT	20000	26000	-	6000 (≤ 18000)	-	-
Hexachlorobenzene	7100	7600	-	500 (≤ 9300)	-	-

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG R0905387**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905387	SA66-0.5B SA66009-0.5B SA66-10B	4,4'-DDE	J (all detects)	A	Project Quantitation Limit (e)
R0905387	SA66-0.5B SA66-0.5BDL SA66009-0.5B SA66009-0.5BDL SA66-10B SA66-10BDL SA129-10B SA129-29B RSAT4-0.5B RSAT4-10B RSAT4-25B RSAT4-40B RSAT4-53B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
R0905387	SA66-0.5B SA66009-0.5B SA66-10B	4,4'-DDE	X	A	Overall assessment of data (o)
R0905387	SA66-0.5BDL SA66009-0.5BDL SA66-10BDL	All TCL compounds except 4,4'-DDE	X	A	Overall assessment of data (o)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG R0905387**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG R0905387**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 21991L3a

SDG #: R0905387

Laboratory: Columbia Analytical Services

Stage 2B

Date: 11/25/09

Page: 1 of 1

Reviewer: JVL

2nd Reviewer: [Signature]

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: 9/21/09
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	COV / CV ≤ 20 %
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	N	Client spec
VIII.	Laboratory control samples	A	LCS / B
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	SW	
XIII.	Overall assessment of data	SW	
XIV.	Field duplicates	SW	D ₁ = 1, 3 D ₂ = 2, 4
XV.	Field blanks	SW	FB = FB072909-50 (from R0904226)

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

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

↓ = * FB 08039-50
= * FB = B80309-50 RE (from R0904279)
D = Duplicate
TB = Trip blank
EB = Equipment blank

Validated Samples: soil

1	SA66-0.5B	D ₁	11	RSAT4-25B	21	97004-MB	31
2	SA66-0.5BDL	D ₂	12	RSAT4-10B	22	96620-MB	32
3	SA66009-0.5B	D ₁	13	RSAT4-53B	23		33
4	SA66009-0.5BDL	D ₂	14		24		34
5	SA66-10B		15		25		35
6	SA66-10BDL		16		26		36
7	SA129-10B		17		27		37
8	SA129-29B		18		28		38
9	RSAT4-0.5B		19		29		39
10	RSAT4-10B		20		30		40

VALIDATION FINDINGS WORKSHEET

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

A. alpha-BHC	I. Dieldrin	Q. Endrin ketone	Y. Aroclor-1242	GG.
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. Heptachlorobenzene	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF.	NN.

Notes: _____

VALIDATION FINDINGS WORKSHEET

Surrogate Spikes

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

Please see qualification below for all questions answered "N". Not applicable questions are identified as "N/A".
 Y N N/A Were surrogates spiked into all samples, standards and blanks?
 Y N N/A Did all surrogate percent recoveries (%R) meet the QC limits?

#	Date	Sample ID	Column	Surrogate Compound	%R (Limits)	Qualifications
1		(500X)	NOT SPEC	A	100 (70-140)	No qual
2		(500X)		B	()	
3		(500X)			()	
4		(500X)			()	
5		(50X)			()	
6		(500X)			()	
7		(50X)			()	
					()	
					()	
					()	
					()	
					()	
					()	
					()	
					()	
					()	
					()	

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

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

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

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
Level I/II/III Only

Y N ~~N/A~~
 Y N ~~N/A~~

Were CRQLs adjusted for sample dilutions, dry weight factors, etc.?

Did the reported results for detected target compounds agree within 10.0% of the recalculated results?

#	Compound Name	Finding	Associated Samples	Qualifications
	J	> cal range	1, 3, 5	J acts / A (e)

Comments: See sample calculation verification worksheet for recalculations

LDC #: 1791 L3a

SDG #: Sea Green

VALIDATION FINDINGS WORKSHEET

Overall Assessment of Data

Page: 101

Reviewer: JVG

2nd Reviewer: [Signature]

METHOD: GC Pesticides/PCBs (EPA SW846 Method 8081/8082)

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

All available information pertaining to the data were reviewed using professional judgement to compliment the determination of the overall quality of the data.

Y N N/A Was the overall quality and usability of the data acceptable?

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		1, 3, 5	J > cu range		X/A (C)
		2, 4, 6	All except J dil		

Comments:

VALIDATION FINDINGS WORKSHEET
Field Duplicates

METHOD: GC Pesticides (EPA SW 846 Method 8081)

Y N NA Were field duplicate pairs identified in this SDG?

Y N NA Were target analytes detected in the field duplicate pairs?

Compound Name	Conc (ug/Kg)		RPD (≤ 50%)	Diff	Diff Limits	Quals (Parent Only)
	1	3				
4,4'-DDE	71000	110000	43			-
4,4'-DDT	19000	23000	19			-
Dieldrin	2200	3100		900	≤ 1800	-
Endrin ketone	2800	2100		700	≤ 1800	-
Hexachlorobenzene	4800	5600	15			-
beta-BHC	750	830		80	≤ 930	-

Compound Name	Conc (ug/Kg)		RPD (≤ 50%)	Diff	Diff Limits	Quals (Parent Only)
	2	4				
4,4'-DDE	100000	150000	40			-
4,4'-DDT	20000	26000		6000	≤ 18000	-
Hexachlorobenzene	7100	7600		500	≤ 9300	-

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Tronox LLC Facility, 2009 Phase B Investigation,
Henderson, Nevada

Collection Date: September 24 through September 25, 2009

LDC Report Date: December 6, 2009

Matrix: Soil/Water

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0905464

Sample Identification

SA205-0.5B	SA121-25BRE
SA205-0.5BRE	SA121-44B
SA205-10B	SA121-44BRE
SA205-25B	SA101-0.5BMS
SA205-41B	SA101-0.5BMSD
SA84-0.5B	
SA84-10B	
SA84009-10B	
SA84-25B	
SA84-43B	
EB092509-SO2A4	
SA101-0.5B	
SA101-10B	
SA101-25B	
SA101-42B	
SA121-0.5B	
SA121009-0.5B	
SA121-10B	
SA121-10BRE	
SA121-25B	

Introduction

This data review covers 24 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 8081A for Chlorinated Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) 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 with the following exceptions:

Sample	Compound	Total Days From Sample Collection Until Extraction	Required Holding Time (in Days) From Sample Collection Until Extraction	Flag	A or P
SA205-0.5BRE	All TCL compounds	15	14	J- (all detects) JJ (all non-detects)	A

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

II. GC/ECD Instrument Performance Check

Instrument performance was acceptable unless noted otherwise under initial calibration and continuing calibration sections.

III. Initial Calibration

Initial calibration of single compounds were performed for the primary (quantitation) column and confirmation column as required by this method.

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

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 20.0% QC limits.

The percent difference (%D) of the second source calibration standard were less than or equal to 20.0% for all compounds with the following exceptions:

Date	Standard	Column	Compound	%D	Associated Samples	Flag	A or P
10/13/09	FC810	STX-CLP1	Endosulfan I	23.3	SA205-0.5BRE SA121-10BRE SA121-25BRE SA121-44BRE 97131-MB	J+ (all detects)	A

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

V. Blanks

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

Sample EB092509-SO2A4 was identified as an equipment blank. No chlorinated pesticide contaminants were found in this blank.

Samples FB080309-SO (from SDG R0904279) and FB080309-SORE (from SDG R0904279) were identified as field blanks. No chlorinated pesticide contaminants were found in these 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	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
SA205-0.5B	Not specified	Tetrachloro-m-xylene	39 (40-140)	All TCL compounds	J- (all detects) UJ (all non-detects)	A
SA205-0.5BRE	Not specified	Tetrachloro-m-xylene	39 (40-140)	All TCL compounds	J- (all detects) UJ (all non-detects)	A
SA121-10B	Not specified	Tetrachloro-m-xylene	30 (40-140)	All TCL compounds	J- (all detects) UJ (all non-detects)	A
SA121-25BRE	Not specified	Tetrachloro-m-xylene	13 (40-140)	All TCL compounds	J- (all detects) UJ (all non-detects)	A
SA121-44B	Not specified	Tetrachloro-m-xylene	23 (40-140)	All TCL compounds	J- (all detects) UJ (all non-detects)	A
SA121-44BRE	Not specified	Tetrachloro-m-xylene	16 (40-140)	All TCL compounds	J- (all detects) UJ (all non-detects)	A

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) and relative percent differences (RPD) 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

Raw data were not reviewed for this SDG.

XII. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0905464	All compounds reported below the PQL.	J (all detects)	A

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
SA205-0.5BRE SA121-10B SA121-25BRE SA121-44BRE	All TCL compounds	X	A

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

XIV. Field Duplicates

Samples SA84-10B and SA84009-10B and samples SA121-0.5B and SA121009-0.5B were identified as field duplicates. No chlorinated pesticides were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	SA121-0.5B	SA121009-0.5B				
4,4'-DDE	2.6	4.5	-	1.9 (≤ 3.6)	-	-
4,4'-DDT	3.6U	3.3	-	0.3 (≤ 3.6)	-	-
Hexachlorobenzene	3.5	5.8	-	2.3 (≤ 1.9)	J (all detects)	A

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG R0905464**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0905464	SA205-0.5BRE	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Technical holding times (h)
R0905464	SA205-0.5BRE SA121-10BRE SA121-25BRE SA121-44BRE	Endosulfan I	J+ (all detects)	A	Continuing calibration (ICV %D) (c)
R0905464	SA205-0.5B SA205-0.5BRE SA121-10B SA121-25BRE SA121-44B SA121-44BRE	All TCL compounds	J- (all detects) UJ (all non-detects)	A	Surrogate spikes (%R) (s)
R0905464	SA205-0.5B SA205-0.5BRE SA205-10B SA205-25B SA205-41B SA84-0.5B SA84-10B SA84009-10B SA84-25B SA84-43B EB092509-SO2A4 SA101-0.5B SA101-10B SA101-25B SA101-42B SA121-0.5B SA121009-0.5B SA121-10B SA121-10BRE SA121-25B SA121-25BRE SA121-44B SA121-44BRE	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
R0905464	SA205-0.5BRE SA121-10B SA121-25BRE SA121-44BRE	All TCL compounds	X	A	Overall assessment of data (o)
R0905464	SA121-0.5B SA121009-0.5B	Hexachlorobenzene	J (all detects)	A	Field duplicates (Difference) (fd)

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG
R0905464**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Equipment Blank Data Qualification Summary - SDG
R0905464**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG R0905464**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21991N3a

VALIDATION COMPLETENESS WORKSHEET

SDG #: R0905464

Stage 2B

Laboratory: Columbia Analytical Services

Date: 2/01/09

Page: 1 of 1

Reviewer: JVC

2nd Reviewer: [Signature]

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	SW	Sampling dates: 1/24-25/09
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	SW	CCW/ICV < 20 %
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	A	
VIII.	Laboratory control samples	A	LCS 1/2
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	SW	
XIV.	Field duplicates	SW	*D ₁ = 7, 8 D ₂ = 16, 17
XV.	Field blanks	ND	EB = 11 FB = FB080309-50 (from R0904/2) = FB080309-50RE

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

*ND = No compounds detected D = Duplicate
R = Rinsate
FB = Field blank

TB = Trip blank
EB = Equipment blank

Validated Samples:

Soil + Water

1		SA205-0.5B	S	11	3	EB092509-SO2A4	N	21	2	SA121-25BRE	S	31	2	97956-MB
2	2	SA205-0.5BRE		12		SA101-0.5B	S	22		SA121-44B		32		97223 - ↓
3		SA205-10B		13		SA101-10B		23		SA121-44BRE		33	3	97131 - ↓
4		SA205-25B		14		SA101-25B		24		SA101-0.5BMS		34		
5		SA205-41B		15		SA101-42B		25		SA101-0.5BMSD	↓	35		
6		SA84-0.5B		16		SA121-0.5B	D ₂	26				36		
7		SA84-10B	D ₁	17		SA121009-0.5B	D ₂	27				37		
8		SA84009-10B	D ₁	18		SA121-10B		28				38		
9		SA84-25B		19	2	SA121-10BRE		29				39		
10		SA84-43B	↓	20		SA121-25B	↓	30				40		

DC #: 21 991 N 39
IDG #: See Cover

VALIDATION FINDINGS WORKSHEET Technical Holding Times

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

If circled dates have exceeded the technical holding times.
 N/A Were all cooler temperatures within validation criteria?

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

Sample ID	Matrix	Preserved	Sampling Date	Extraction date	Analysis date	Total # of Days	Qualifier
2	S	N	9/24/09	10/09/09	10/15/09	15	J-VJA CH

TECHNICAL HOLDING TIME CRITERIA

Water: Extracted within 7 days, analyzed within 40 days.
soil: Extracted within 14 days, analyzed within 40 days.

VALIDATION FINDINGS WORKSHEET

Continuing Calibration

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

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

What type or calibration verification calculation was performed? %D or RPD

Were Evaluation mix standards run before initial calibration and before samples?

Were Endrin & 4,4'-DDT breakdowns acceptable in the Evaluation Mix standard ($\leq 15.0\%$ for individual breakdowns)?

Was at least one standard run daily to verify the working curve?

Did the continuing calibration standards meet the percent difference (%D) / relative percent difference (RPD) criteria of $\leq 20.0\%$?

Level 1/7/8 Only

Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Column	Compound	%D (Limit ≤ 20.0)	RT (Limits)	Associated Samples	Qualifications	
	10/12/09	FC810 (101)	SPX-C1P1	H (4)	23.3	()	2, 19, 21, 23, 97, 121, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000		

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

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. Hexachlorobenzene	MM.
H. Endosulfan I	P. Methoxychlor	X. Aroclor-1232	FF.	NN.

Notes:

DC #: 21991X39
 SDG #: Sea Army

VALIDATION FINDINGS WORKSHEET
 Surrogate Spikes

Page: 1 of 1
 Reviewer: JVC
 2nd Reviewer: [Signature]

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

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

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

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

#	Date	Sample ID	Column	Surrogate Compound	%R (Limits)	Qualifications
		1	Not specified	A	39 (40-140)	J-N/A (S)
		2		A	39 ()	↓
		6 (10x)		A, B	DO ()	No qual
		18 18		A	30 ()	J-N/A (S)
		21		A	13 ()	↓
		22		A	23 ()	↓
		23	↓	A	16 ()	↓
					()	
					()	
					()	
					()	
					()	
					()	
					()	
					()	

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

VALIDATION FINDINGS WORKSHEET
Overall Assessment of Data

LDC #: 11111111
 SDG #: Su Gray

Page: 1 of 1
 Reviewer: JY6
 2nd Reviewer: [Signature]

METHOD: GC Pesticides/PCBs (EPA SW846 Method 8081/8082)

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

All available information pertaining to the data were reviewed using professional judgement to compliment the determination of the overall quality of the data.

Y N N/A Was the overall quality and usability of the data acceptable?

#	Date	Sample ID	Finding	Associated Samples	Qualifications
		2	outside H.T.		X/A
		18, 21, 23	surround outside limits		↓

Comments: _____

LDC #: 21 991 N3A
 SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Page: 1 of 1
 Reviewer: JVL
 2nd reviewer: [signature]

METHOD: GC Pesticides/PCBs (EPA SW846 Method 8081/8082)

Y N N/A Were field duplicate pairs identified in this SDG?
Y N N/A Were target compounds detected in this field duplicate pairs?

Compound	Concentration ($\mu\text{g}/\text{kg}$)		RPD	Percent mk
	16	17		
J	2.6	4.5	1.9 ($\leq 3.6 D$)	-
O	3.6 U	3.3	0.3	-
EE	3.5	5.8	2.3 ($\leq 1.9 D$)	Jdet

Compound	Concentration ()		RPD

Compound	Concentration ()		RPD

Compound	Concentration ()		RPD