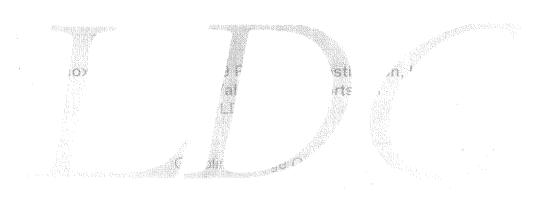
Tronox LLC Facility, 2009 Phase B Investigation, Henderson Data Validation Reports LDC #21495

Gasoline Range Organics



Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:

Tronox LLC Facility, 2009 Phase B Investigation,

Henderson, Nevada

Collection Date:

June 10 through June 11, 2009

LDC Report Date:

September 22, 2009

Matrix:

Soil

Parameters:

Gasoline Range Organics

Validation Level:

Stage 2B

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903184

Sample Identification

SA35-0.5B

SA56-0.5B

SA166-0.5B

SA35-0.5BMS

SA35-0.5BMSD

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 8015B for Gasoline Range Organics.

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 III.

Field duplicates are summarized in Section IX.

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.
- UJ 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. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903184	All compounds reported below the PQL.	J (all detects)	Α

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Data Qualification Summary - SDG R0903184

SDG	Sample	Compound	Flag	A or P	Reason
R0903184	SA35-0.5B SA56-0.5B SA166-0.5B	All compounds reported below the PQL.	J (all detects)	А	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0903184

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0903184

No Sample Data Qualified in this SDG

Tronox Northgate Henderson VALIDATION COMPLETENESS WORKSHEET

LDC #: 21495F7 Stage 2B SDG #: R0903184

Date	=: <u>1/17/09</u>
Page	
Reviewe	r: <u> </u>
2nd Reviewe	r: <u> </u>
	,

Laboratory: Columbia Analytical Services

METHOD: GC Gasoline Range Organics (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
1.	Technical holding times	Ą	Sampling dates: 6/10 - 11 / 8 9
lla.	Initial calibration	A	
llb.	Calibration verification/ICV	A	CW = 202
111.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	ıcs
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	N	

Note:

A = Acceptable

N = Not provided/applicable SW = See worksheet

ND = No compounds detected

R = Rinsate FB = Field blank D = Duplicate

TB = Trip blank

EB = Equipment blank

Validated Samples:

(or)

	2011					
1	SA35-0.5B	11	157737 MB	21	31	
2	SA56-0.5B	12		22	32	-
3	SA166-0.5B	13		23	33	
4	SA35-0.5BMS	14		24	34	
5	SA35-0.5BMSD	15		25	35	
6		16		26	36	
7		17		27	37	
8		18		28	38	
9		19		29	39	
10		20		30	40	

Notes:	(byo IW)	

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:

Tronox LLC Facility, 2009 Phase B Investigation,

Henderson, Nevada

Collection Date:

June 19 through June 24, 2009

LDC Report Date:

September 22, 2009

Matrix:

Soil

Parameters:

Gasoline Range Organics

Validation Level:

Stage 2B

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903443

Sample Identification

SA104-0.5B

SA129-0.5B

SA70-0.5B

SA53-0.5B

SA200-0.5B

RSAO6-0.5B

SA51-0.5B

SA53-0.5BMS

SA53-0.5BMSD

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 8015B for Gasoline Range Organics.

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 III.

Field duplicates are summarized in Section IX.

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.
- UJ 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. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903443	All compounds reported below the PQL.	J (all detects)	А

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Data Qualification Summary - SDG R0903443

SDG	Sample	Compound	Flag	A or P	Reason
R0903443	SA104-0.5B SA129-0.5B SA70-0.5B SA53-0.5B SA200-0.5B RSAO6-0.5B SA51-0.5B	All compounds reported below the PQL.	J (all detects)	А	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0903443

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0903443

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

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LDC #:_	21495G7	_ VALIDATION COMPLETENESS WORKSHEET	Date: <u>9/16/69</u>
SDG #:_	R0903443	Stage 2B	Page: <u> </u>
Laborato	ory: Columbia Analyt	ical Services	Reviewer: <u>3٧</u>
	,		2nd Reviewer:
		(7

METHOD: GC Gasoline Range Organics (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
1.	Technical holding times	A	Sampling dates: 6/19-24/84
lla.	Initial calibration	A	,
lib.	Calibration verification/JGV	Á	COV = 20 3
111.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	Α	
IVc.	Laboratory control samples	A	ICS .
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	N	

Note:

A = Acceptable

N = Not provided/applicable SW = See worksheet

ND = No compounds detected

R = Rinsate

D = Duplicate

TB = Trip blank

FB = Field blank EB = Equipment blank

Validated Samples:

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	301				
1	SA104-0.5B	11	15 8934 MB	21	31
2	SA129-0.5B	12	159680 MB	22	32
3	SA70-0.5B	13		23	33
4	SA53-0.5B	14		24	34
5	SA200-0.5B	15		25	35
6	RSAO6-0.5B	16		26	36
7	SA51-0.5B	17		27	37
8	SA53-0.5BMS	18		28	38
9	SA53-0.5BMSD	19		29	 39
10		20		30	 40

Notes:	(10 14)

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:

Tronox LLC Facility, 2009 Phase B Investigation,

Henderson, Nevada

Collection Date:

June 30, 2009

LDC Report Date:

September 22, 2009

Matrix:

Soil

Parameters:

Gasoline Range Organics

Validation Level:

Stage 2B

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903615

Sample Identification

SA50-0.5B

SA106-0.5B

SA102-0.5B

SA109-0.5B

SA106-0.5BMS

SA106-0.5BMSD

Introduction

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

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 III.

Field duplicates are summarized in Section IX.

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.
- UJ 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. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

III. Blanks

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

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903615	All compounds reported below the PQL.	J (all detects)	А

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Data Qualification Summary - SDG R0903615

SDG	Sample	Compound	Flag	A or P	Reason
R0903615	SA50-0.5B SA106-0.5B SA102-0.5B SA109-0.5B	All compounds reported below the PQL.	J (all detects)	А	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0903615

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0903615

No Sample Data Qualified in this SDG

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LDC #:_	21495H7	VALIDATION COMPLETENESS WORKSHEET
SDG #:_	R0903615	Stage 2B
Laborato	ory: Columbia Anal	lytical Services

Date:	9/18/04
Page:_	<u> 1</u> of <u> /</u>
Reviewer:	
2nd Reviewer:	4
·	7

METHOD: GC Gasoline Range Organics (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
l.	Technical holding times	A	Sampling dates: 6/30/09
IIa.	Initial calibration	A	,
llb.	Calibration verification4eV	A	CM = 20 2
111.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	us
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	N	
X.	Field blanks	N	

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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:

Coil

	507					
1	SA50-0.5B	11	160246 MB	21	31	
2	SA106-0.5B	12		22	32	
3	SA102-0.5B	13		23	33	
4	SA109-0.5B	14		24	34	
5	SA106-0.5BMS	15		25	35	
6	SA106-0.5BMSD	16		26	36	
7		17		27	 37	
8		18		28	38	
9		19		29	39	
10		20		30	 40	

Notes:			

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:

Tronox LLC Facility, 2009 Phase B Investigation,

Henderson, Nevada

Collection Date:

July 1, 2009

LDC Report Date:

September 22, 2009

Matrix:

Soil/Water

Parameters:

Gasoline Range Organics

Validation Level:

Stage 2B

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903678

Sample Identification

EB070109-SO1 SA114-0.5B SA114009-0.5B

Introduction

This data review covers 2 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 8015B for Gasoline Range Organics.

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 III.

Field duplicates are summarized in Section IX.

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.
- UJ 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. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits.

III. Blanks

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

Sample EB070109-SO1 was identified as an equipment blank. No gasoline range organic contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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.

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903678	All compounds reported below the PQL.	J (all detects)	Α

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Data Qualification Summary - SDG R0903678

SDG	Sample	Compound	Flag	A or P	Reason
R0903678	EB070109-SO1 SA114-0.5B SA114009-0.5B	All compounds reported below the PQL.	J (all detects)	А	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0903678

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Gasoline Range Organics - Field Blank Data Qualification Summary - SDG R0903678

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #:	21495 7	VALIDATION COMPLETENESS WORKSHEET
SDG #:_	R0903678	Stage 2B
Laborato	ry: Columbia Analytica	l Services

Page: \(\frac{1}{2}\)of \(\frac{1}{2}\) Reviewer:__ 2nd Reviewer:

METHOD: GC Gasoline Range Organics (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 7/01/09
lla.	Initial calibration	4	' '
llb.	Calibration verification/ICV	A	car = 202
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	2	client spec
IVc.	Laboratory control samples	Α	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D = 1,3
X.	Field blanks	ND	EB = 1

Note:

A = Acceptable

N = Not provided/applicable

SW = See worksheet

ND = No compounds detected

R = Rinsate FB = Field blank D = Duplicate

TB = Trip blank

EB = Equipment blank

Validated Samples:

water + Soil

1	EB070109-SO1		W	11	160456	MB	21	31	
2 7	SA114-0.5B	p	۶	12)	160456	MB	22	32	
)3	SA114009-0.5B	D	1	13			23	33	
4				14			24	34	·
5				15			25	 35	
6				16			26	 36	
7	-			17			27	37	
8				18			28	38	
9				19			29	39	
10				20			30	40	

Notes:	Iron Area	1)		
	(***	· /		

Tronox LLC Facility, 2009 Phase B Investigation, Henderson Data Validation Reports LDC #21495

TPH as Extractables

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

Project/Site Name:

Tronox LLC Facility, 2009 Phase B Investigation,

Henderson, Nevada

Collection Date:

June 1 through June 4, 2009

LDC Report Date:

September 29, 2009

Matrix:

Soil

Parameters:

Total Petroleum Hydrocarbons as Extractables

Validation Level:

Stage 2B

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903051

Sample Identification

RSA12-0.5B

SA88-0.5BMSD

RSAI3-0.5B

RSAJ5-0.5B

RSAK5-0.5B

SA76-0.5B

SA76009-0.5B

RSAL3-0.5B

SA100-0.5B

RSAM3-0.5B

RSAM2-0.5B

SA189-0.5B

SA88-0.5B

SA152-0.5B

SA152009-0.5B

RSAJ2-0.5B

RSAJ3-0.5B

SA202-0.5B

RSAJ5-0.5BMS

RSAJ5-0.5BMSD

SA88-0.5BMS

Introduction

This data review covers 21 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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 III.

Field duplicates are summarized in Section IX.

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.
- UJ 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. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 20.0% QC limits with the following exceptions:

Date	Compound	%D	Associated Samples	Flag	A or P
6/8/09	Oil range organics	20.4	RSAI3-0.5B RSAJ5-0.5B RSAK5-0.5B SA76-0.5B SA76009-0.5B RSAL3-0.5B SA100-0.5B RSAM3-0.5B RSAJ5-0.5BMS RSAJ5-0.5BMSD	J+ (all detects)	А
6/9/09	Oil range organics	23.5	RSAM2-0.5B	J+ (all detects)	А

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

III. Blanks

Method blanks were reviewed for each matrix as applicable. No total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

Sample FB072109-SO (from SDG R0904016) was identified as a field blank. No total petroleum hydrocarbons as extractable contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903051	All compounds reported below the PQL,	J (all detects)	А

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples SA76-0.5B and SA76009-0.5B, samples SA152-0.5B and SA152009-0.5B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples with the following exceptions:

	Concentrat	ion (ug/Kg)				A or P
Compound	SA76-0.5B	SA76009-0.5B	RPD (Limits)	Difference (Limits)	Flags	
Diesel range organics	42000	43000U	-	1000 (≤43000)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG R0903051

SDG	Sample	Compound	Flag	A or P	Reason
R0903051	RSAI3-0.5B RSAJ5-0.5B RSAK5-0.5B SA76-0.5B SA76009-0.5B RSAL3-0.5B SA100-0.5B RSAM3-0.5B RSAM3-0.5B	Oil range organics	J+ (all detects)	А	Continuing calibration (%D) (c)
R0903051	RSA12-0.5B RSAI3-0.5B RSAJ5-0.5B RSAK5-0.5B SA76-0.5B SA76009-0.5B RSAL3-0.5B SA100-0.5B RSAM3-0.5B RSAM2-0.5B SA189-0.5B SA189-0.5B SA152-0.5B SA152-0.5B SA152-0.5B SA152-0.5B SA152-0.5B SA152-0.5B RSAJ2-0.5B RSAJ2-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification Summary - SDG R0903051

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification Summary - SDG R0903051

No Sample Data Qualified in this SDG

SDG FLabora METH The sa	t: 21495C8 #: R0903051 atory: Columbia Analytica IOD: GC TPH as Extract amples listed below were tion findings worksheets.	N COMP S 346 Metho	PLETEN Stage 2B od 8015B)			Date: <u>9//// /6</u> Page: 1 of 1 Reviewer: <u>5</u> 2nd Reviewer:	
	Validation	Area			· · · · · · · · · · · · · · · · · · ·	Comments	
1.	Technical holding times	A	Sampling of	lates: 6/61-	04/09		
lla.	Initial calibration	A					
IIb.				cen/101 c 20 2			
111.	Blanks	SW A		· · · · · · · · · · · · · · · · · · ·			
IVa.	a. Surrogate recovery						
IVb.	/b. Matrix spike/Matrix spike duplicates						
IVc.	Vc. Laboratory control samples		A	u	s/p		
V.			N				
VI.			N				
VII.							
VIII.	Overall assessment of data	A					
IX.	Field duplicates	: W	D, =	= 5,6	*D2 =	13, 14	
X.	Field blanks		ND	FB=	= FB072109		R 0904016
Note:	Note: A = Acceptable N = Not provided/applicable SW = See worksheet All Sh'LS			s detected	D = Duplic TB = Trip t EB = Equip		
1	RSA12-0.5B	11 XSA189-0.5B		21	SA88-0.5BMSD	31	88788 MB
2 1	RSAI3-0.5B	12 SA88-0.5B		22		32	88924 MB
	RSAJ5-0.5B	13 SA152-0.5B	Dy	23		33	,
4 \	RSAK5-0.5B	14 SA152009-0.5	_{5В} Д-	y 24		34	
5	SA76-0.5B b ,	15 RSAJ2-0.5B		25		35	
6	SA76009-0.5B D,	16 RSAJ3-0.5B		26		36	
7	RSAL3-0.5B	17 SA202-0.5B		27		37	

Notes:(No changes for	might result	(n)	
	0			

18 RSAJ5-0.5BMS

19 1 RSAJ5-0.5BMSD

20 SA88-0.5BMS

28

29

30

38

39

40

SA100-0.5B

RSAM3-0.5B

RSAM2-0.5B

SDG #: 02 Co-LDC # 21495 C8

VALIDATION FINDINGS WORKSHEET Continuing Calibration

2nd Reviewer:

Reviewer: 475 Page: _lof_l

METHOD: CG HPLC

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A". What type of continuing calibration calculation was performed? \(\inf \text{\text{MD}} \) or \(\text{RPD} \)

Were continuing calibration standards analyzed at the required frequencies?

Did the continuing calibration standards meet the %D / RPD validation criteria of <15.0%? A A A A

Level IV Only Y N(N/A)

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

4/402/A
k
0
(
3,5
0 80
44315
1 60/60/2

LDC #: 21 445 C8 SDG #: (24

VALIDATION FINDINGS WORKSHEET Field Duplicates

Lof	96	d
Page:	Reviewer:	2nd reviewer:

GC ___ HPLC Were field duplicate pairs identified in this SDG? Were target compounds detected in the field duplicate pairs?

METHOD:

	Concentration	Concentration ($\frac{49}{k}$	%RPD	Qualification
Compound	五	, 1680 		Parent only / All Samples
DRO	20027	43000 y	1000 (+ 43000 ptt	(H;

		[I ———	r]	_		Г
Chamication	Parent only / All Samples					Qualification	Parent only / All Samples	
מאָצְיּ						%RPD	רושונ	
,						(
						Concentration (
	Compound						Compound	

Jan to h other (43000 - MRL + 406 regented

FLDUP.wpd

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

Project/Site Name:

Tronox LLC Facility, 2009 Phase B Investigation,

Henderson, Nevada

Collection Date:

June 5 through June 11, 2009

LDC Report Date:

October 2, 2009

Matrix:

Soil

Parameters:

Total Petroleum Hydrocarbons as Extractables

Validation Level:

Stage 2B

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903184

Sample Identification

SA127-0.5B

RSAO3-0.5BMSD

RSAJ6-0.5B

SA166-0.5BMS

RSAK6-0.5B

SA166-0.5BMSD

RSAK8-0.5B

RSAL7-0.5B

RSAL8-0.5B

SA35-0.5B

SA55-0.5B

SA56-0.5B

SA176-0.5B

RSAO3-0.5B

SA182-0.5B

SA201-0.5B

SA166-0.5B

RSAK4-0.5B

RSAK4009-0.5B

SA134-0.5B

SA127-0.5BMS

SA127-0.5BMSD

RSAO3-0.5BMS

Introduction

This data review covers 23 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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 III.

Field duplicates are summarized in Section IX.

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.
- UJ 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. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

Method blanks were reviewed for each matrix as applicable. No total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903184	All compounds reported below the PQL.	J (all detects)	А

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples RSAK4-0.5B and RSAK4009-0.5B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG R0903184

SDG	Sample	Compound	Flag	A or P	Reason
R0903184	SA127-0.5B RSAJ6-0.5B RSAK6-0.5B RSAK8-0.5B RSAL7-0.5B RSAL8-0.5B SA35-0.5B SA55-0.5B SA56-0.5B SA176-0.5B RSAO3-0.5B SA182-0.5B SA182-0.5B SA182-0.5B SA184-0.5B RSAK4-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification Summary - SDG R0903184

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification Summary - SDG R0903184

No Sample Data Qualified in this SDG

Tronox Northgate Henderson VALIDATION COMPLETENESS WORKSHEET

LDC	₩.	21495F8
SDG	#:	R0903184

Stage 2B

Laboratory: Columbia Analytical Services

Page: of 1
Reviewer: 04 (2
2nd Reviewer: 6

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
l.	Technical holding times	A	Sampling dates: 6 /05 - 11 /0 9
lla.	Initial calibration	A	
IIb.	Calibration verification/ICV	#	car/101 = 20 3
111.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	Α	
IVc.	Laboratory control samples	A	ics/b
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	Ą	
IX.	Field duplicates	ИЪ	b = 15, 16
X.	Field blanks	N	

Note:

A = Acceptable

N = Not provided/applicable

SW = See worksheet

ND = No compounds detected

R = Rinsate FB = Field blank D = Duplicate

TB = Trip blank

EB = Equipment blank

Validated	Samples:
- 444	ou.i.p.oo.

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		\&*`				
1	SA127-0.5B	11 RSA03-0.5B	21	RSA03-0.5BMSD	31	89052 MB
2	RSAJ6-0.5B	12 3 SA182-0.5B	22	SA166-0.5BMS	32 >	89352
3	RSAK6-0.5B	13 3 SA201-0.5B	23	SA166-0.5BMSD	33	89403
4 1	RSAK8-0.5B	14 ³ SA166-0.5B	24		34	
5 1	RSAL7-0.5B	15 3 RSAK4-0.5B D	25		35	
6 1	RSAL8-0.5B	16 3 RSAK4009-0.5B D	26		36	
7 7	SA35-0.5B	- 17 ³ SA134-0.5B	27		37	
ε γ	SA55-0.5B	18 ¹ SA127-0.5BMS	28		38	
γ 9 γ	SA56-0.5B	19 SA127-0.5BMSD	29		39	
10 7	SA176-0.5B	20 RSA03-0.5BMS	30		40	

Notes: #9 0 RD changed from 130000 to 178000

78 12 0 RD Changed from 47 000 to 62000

(# 11 - RSA 03 4 letter not 4)

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:

Tronox LLC Facility, 2009 Phase B Investigation,

Henderson, Nevada

Collection Date:

July 19 through July 24, 2009

LDC Report Date:

September 22, 2009

Matrix:

Soil

Parameters:

Total Petroleum Hydrocarbons as Extractables

Validation Level:

Stage 2B

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903443

Sample Identification

SA198-0.5B

SA150-0.5BMSD

SA64-0.5B

SA104-0.5B

SA129-0.5B

SA70-0.5B

SA150-0.5B

RSAN5-0.5B

SA53-0.5B

SA201-10B

SA201-28B

SA201009-28B

SA43009-0.5B

SA40-0.5B

SA200-0.5B

RSAO6-0.5B

SA51-0.5B

SA43-0.5B

SA70-0.5BMS

SA70-0.5BMSD

SA150-0.5BMS

Introduction

This data review covers 21 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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.

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Blank results are summarized in Section III.

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- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
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- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
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- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
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- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
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- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

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

II. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

Method blanks were reviewed for each matrix as applicable. No total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

Sample FB072109-SO (from SDG R0904016) was identified as a field blank. No total petroleum hydrocarbons as extractable contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903443	All compounds reported below the PQL.	J (all detects)	А

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples SA201-28B and SA201009-28B and samples SA43009-0.5B and SA43-0.5B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG R0903443

SDG	Sample	Compound	Flag	A or P	Reason
R0903443	SA198-0.5B SA64-0.5B SA104-0.5B SA129-0.5B SA70-0.5B SA150-0.5B RSAN5-0.5B SA53-0.5B SA201-10B SA201-28B SA201009-28B SA43009-0.5B SA40-0.5B SA40-0.5B SA200-0.5B SA51-0.5B SA51-0.5B	All compounds reported below the PQL.	J (all detects)		Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification Summary - SDG R0903443

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification Summary - SDG R0903443

No Sample Data Qualified in this SDG

Tronox Northgate Henderson NORKSHEET

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LDC #: 21495G8	VALIDATION COMPLETENESS V
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Date:	9/1	0/09
Page:_	of)
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SDG #: R0903443

Stage 2B

2nd Reviewer

Laboratory: Columbia Analytical Services

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/19 - 24/09
lla.	Initial calibration	A	*
IIb.	Calibration verification/ICV	A	CCV/10V = 202
III.	Blanks	Δ	
IVa.	Surrogate recovery	Ą	
IVb.	Matrix spike/Matrix spike duplicates	Ā	
IVc.	Laboratory control samples	Α	ics/p
V	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	Д	**
IX.	Field duplicates	SHIM	$D_1 = 10, 11$ $D_2 = 12, 17$
X.	Field blanks	ND	FB = FB072109-SO from R09040164

Note:

A = Acceptable

N = Not provided/applicable SW = See worksheet

YND = No compounds detected D = Duplicate R = Rinsate

FB = Field blank

TB = Trip blank

EB = Equipment blank

Validated Samples:

Soil

1 1	SA198-0.5B	11	SA201009-28B D,	21	SA150-0.5BMSD	31	89986 MB
2	SA64-0.5B	12	SA43009-0.5B \mathcal{D}_{γ}	22		32	90259 MB
3	SA104-0.5B	13	SA40-0.5B	23		33	
4)	SA129-0.5B	14	SA200-0.5B	24		34	
5 j	SA70-0.5B	15	RSAO6-0.5B	25		35	
6	SA150-0.5B	16	SA51-0.5B	26		36	
7	RSAN5-0.5B	17	SA43-0.5B ₽ ✓	27		37	
8	SA53-0.5B	18	SA70-0.5BMS	28		38	
9	SA201-10B	19	SA70-0.5BMSD	29		39	
10	SA201-28B D 1	20	SA150-0.5BMS	30		40	

Notes:_	aro value chanced	for # 4-6,1	12 13	
	<i>3</i> -		•	

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:

Tronox LLC Facility, 2009 Phase B Investigation,

Henderson, Nevada

Collection Date:

June 29 through June 30, 2009

LDC Report Date:

September 22, 2009

Matrix:

Soil

Parameters:

Total Petroleum Hydrocarbons as Extractables

Validation Level:

Stage 2B

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903615

Sample Identification

SA45-0.5B

SA452009-0.5B

SA187-0.5

SA153-0.5B

SA186-0.5B

SA185-0.5B

SA185-0.5BRE

RSA05-0.5B

SA152-10B

SA152-20B

SA152-34B

SA50-0.5B

SA54-0.5B

SA106-0.5B

SA102-0.5B

SA109-0.5B

SA45-0.5BMS

SA45-0.5BMSD

SA106-0.5BMS

SA106-0.5BMSD

Introduction

This data review covers 20 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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 III.

Field duplicates are summarized in Section IX.

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.
- UJ 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. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

Method blanks were reviewed for each matrix as applicable. No total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

Sample	Surrogate	%R (Limits)	Compound	Flag	A or P
SA185-0.5B	ortho-Terphenyl	43 (55-116)	TPH as extractables	J- (all detects) UJ (all non-detects)	А

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903615	All compounds reported below the PQL.	J (all detects)	Α

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. 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
SA185-0.5B	All TCL compounds	X	А

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

IX. Field Duplicates

Samples SA45-0.5B and SA452009-0.5B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples with the following exceptions:

	Concentrat	ion (ug/Kg)	222	.		
Compound	SA45-0.5B	SA452009-0.5B	RPD (Limits)	Difference (Limits)	Flags	A or P
Diesel range organics	130000	130000	-	0 (≤42000)	-	-
Oil range organics	53000	50000	-	3000 (≤42000)	-	•

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG R0903615

SDG	Sample	Compound	Flag	A or P	Reason
R0903615	SA185-0.5B	TPH as extractables	J- (all detects) UJ (all non-detects)	А	Surrogate recovery (%R) (s)
R0903615	SA45-0.5B SA452009-0.5B SA187-0.5 SA153-0.5B SA186-0.5B SA185-0.5BRE RSA05-0.5B SA152-10B SA152-10B SA152-20B SA152-34B SA50-0.5B SA50-0.5B SA54-0.5B SA106-0.5B SA102-0.5B SA109-0.5B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
R0903615	SA185-0.5B	TPH as extractables	х	А	Overall assessment of data (o)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification Summary - SDG R0903615

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification Summary - SDG R0903615

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

LDC #: 21495H8	VALIDATION COMPLETENESS WORKSHEET	
SDG #: R0903615	Stage 2B	
Laboratory: <u>Columbia Analytica</u>	l Services	

Date:	9/18/09
Page:_	<u>1</u> of
Reviewer:	- TVL
2nd Reviewer:	<u> </u>
	a

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6 /29 - 30 /19
lla.	Initial calibration	À	,
IIb.	Calibration verification/ICV	A	cw/10 = 20 3
III.	Blanks	À	
IVa.	Surrogate recovery	SW)	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	LCS /D
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	SW	
IX.	Field duplicates	ZW.	0=1,2
X.	Field blanks	N	·

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:

cail

	501		
† 1	SA45-0.5B <i>D</i>	11 SA152-34B 21 9 0 591 MB 31	
2	SA452009-0.5B b	12 SA50-0.5B 22 7 90 6,96 32	
3	SA187-0.5	13 ² SA54-0.5B 23 33	
4	SA153-0.5B	+ 14 7\$A106-0.5B 24 34	
5	SA186-0.5B	15 SA102-0.5B 25 35	
6	SA185-0.5B	16 3 SA109-0.5B 26 36	
72	SA185-0.5BRE	17 SA45-0.5BMS 27 37	
8	RSAO5-0.5B	18 SA45-0.5BMSD 28 38	
9	SA152-10B	19 XSA106-0.5BMS 29 39	
10	SA152-20B	20 SA106-0.5BMSD 30 40	

Notes:		

LDC#: 21465 #8 SDG#: 54 60~

Surrogate Recovery

2nd Reviewer:_ Reviewer.

VALIDATION FINDINDS WORKSHEET

METHOD: ___GC __ HPLC Are surrogates required by the method? Yes___ or No_

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

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

Tetrachloro-m- xylene Qualifications アス Surrogate Compound 1-Chloro-3-Nitrobenzene Triphenyl Phosphate Tributyl Phosphate 3,4-Dinitrotoluene Tri-n-propyttin Tripentyltin 55-116 ₹ > Dichlorophenyl Acetic Acid (DCAA) %R (Limits) Surrogate Compound Decachlorobiphenyl (DCB) 1-methylnaphthalene Benzo(e)Pyrene Terphenyl-D14 4-Nitrophenol ø Σ z 0 Did all surrogate recoveries (%R) meet the QC limits? Surrogate Compound Surrogate Compound Fluorobenzene (FBZ) Ortho-Terphenyl Bromobenzene n-Triacontane Hexacosane Octacosane Column 28 - 5 O I ¥ 4-Bromofluorobenzene (BFB) 1.4-Diffuorobenzene (DFB) Surrogate Compound Chlorobenzene (CBZ) a,a,a-Trifluorotoluene Bromochlorobenene. 1,4-Dichlorobutane Sample ID 8 ပ 4 ш

LDC# 21445#8 SDG#: 34 (122)

VALIDATION FINDINGS WORKSHEET Overall Assessment of Data

Page: of L Reviewer: 3/6 2nd Reviewer:

METHOD: __GC __HPLC

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.

Was the overall quality and usability of the data acceptable?

OVRNew.wpd

LDC#: 21495 #8 SDG#: 54 (me)

VALIDATION FINDINGS WORKSHEET Field Duplicates

Page: lot / Reviewer:

METHOD:

GC HPLC
Were field duplicate pairs identified in this SDG?
Were target compounds detected in the field duplicate pairs?

Compound	Concentration (Mg/kg)	119/kg)	%RPD Limit	Qualification
o incoming		٨		Parent only / All Samples
DRO	130 000	(30000	(= 42000 W.F.)	47
0 RO	23000	20000	3000	
			,	
	Concentration ((%RPD	Qualification
Compound			Limit	Parent only / All Samples
	Concentration ()	%RPD	Qualification
Compound			LIMIT	Parent only / All Samples
•				
7000000	Concentration (%RPD	Qualification
				Parent only / All Samples

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:

Tronox LLC Facility, 2009 Phase B Investigation,

Henderson, Nevada

Collection Date:

July 1 through July 2, 2009

LDC Report Date:

September 22, 2009

Matrix:

Soil/Water

Parameters:

Total Petroleum Hydrocarbons as Extractables

Validation Level:

Stage 2B

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903678

Sample Identification

EB070109-SO1

SA82-0.5BMS

SA114-0.5B

SA82-0.5BMSD

SA114009-0.5B

RSAK3-31BMS RSAK3-31BMSD

RSAN6-0.5B

SA82-0.5B

SA82-10B

SA82-29B

0/102 200

RSAL3-10B

RSAL3-30B

SA134-10B

SA134-20B

SA134-31B

SA134009-31B

SA88-10B

SA88-20B

SA88-32B

RSAK3-0.5B

RSAK3-10B

RSAK3-20B

RSAK3-31B

Introduction

This data review covers 23 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 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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 III.

Field duplicates are summarized in Section IX.

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.
- UJ 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. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

Method blanks were reviewed for each matrix as applicable. No total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

Sample EB070109-SO1 was identified as an equipment blank. No total petroleum hydrocarbons as extractable contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903678	All compounds reported below the PQL.	J (all detects)	А

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples SA114-0.5B and SA114009-0.5B and samples SA134-31B and SA134009-31B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples with the following exceptions:

	Concentrat	ion (ug/Kg)	DDD	Difformes		
Compound	SA114-0.5B	SA114009-0.5B	RPD (Limits)	Difference (Limits)	Flags	A or P
Diesel range organics	110000	100000	-	10000 (≤44000)	-	-
Oil range organics	110000	99000	-	11000 (≤44000)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG R0903678

SDG	Sample	Compound	Flag	A or P	Reason
R0903678	EB070109-SO1 SA114-0.5B SA114-0.5B SA114009-0.5B RSAN6-0.5B SA82-0.5B SA82-10B SA82-29B RSAL3-10B RSAL3-30B SA134-10B SA134-20B SA134-31B SA134-09-31B SA88-10B SA88-20B SA88-32B RSAK3-10B RSAK3-10B RSAK3-10B RSAK3-10B RSAK3-10B	All compounds reported below the PQL.	J (all detects)	Α	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification Summary - SDG R0903678

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification Summary - SDG R0903678

No Sample Data Qualified in this SDG

Tronox Northgate Henderson VALIDATION COMPLETENESS WORKSHEET

LDC #: 2149518 SDG #: R0903678

Stage 2B

Laboratory: Columbia Analytical Services

Date: 9/18/09 Page: lof_l Reviewer: JV7 2nd Reviewer:

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments				
I.	Technical holding times	A	Sampling dates: 7/01- 67/09				
IIa.	Initial calibration	A	'				
IIb.	Calibration verification/ICV	A	COV /ON = 2021				
111.	Blanks	Д					
IVa.	Surrogate recovery	A					
IVb.	Matrix spike/Matrix spike duplicates	A					
IVc.	Laboratory control samples	A	us/p				
V.	Target compound identification	N					
VI.	Compound Quantitation and CRQLs	N					
VII.	System Performance	N					
VIII.	Overall assessment of data	A	Υ				
IX.	Field duplicates	S W	$D_1 = 2,5$ $D_2 = 12,13$				
X.	Field blanks	ND	EB = 1				

Note:

A = Acceptable

N = Not provided/applicable

SW = See worksheet

₹ND = No compounds detected

R = Rinsate FB = Field blank D = Duplicate

TB = Trip blank

EB = Equipment blank

Validated Samples: 1 202 WATE

	WALL	<u> </u>		301 /					
1	EB070109-SO1	W	11`	SA134-20B	S	21	SA82-0.5BMS	S 31 /	90934 MB
2 ×	SA114-0.5B	p, s	12 3	SA134-31B	\mathcal{D}_{Y}	22	SA82-0.5BMSD	32 7	90 801
3 2	SA114009-0.5B	ρ_1	13 3	SA134009-31B	$\mathcal{D}_{\boldsymbol{\gamma}}$	23	RSAK3-31BMS	33 3	90882
4 2	RSAN6-0.5B	Í	ĩ ₄ }	SA88-10B		24	RSAK3-31BMSD	34	
5 2	SA82-0.5B		15 3	SA88-20B		25		35	
6 7	SA82-10B		16 3	SA88-32B		26		36	
7 7	SA82-29B		17 ³	RSAK3-0.5B		27		37	
8 Y	RSAL3-10B		18	RSAK3-10B		28		38	
9 7	RSAL3-30B		19 3	RSAK3-20B		29		39	
703	SA134-10B	y	20 20	RSAK3-31B	<u>ل</u>	30		40	

Notes:		 	
-			

LDC#: 21495 I8 SDG #: Se Good

WETHOD:

VALIDATION FINDINGS WORKSHEET

Field Duplicates

Page: lof / eviewer: 51/6 Reviewer: 31/6 2nd reviewer:

ł				2nd reviewer.
Y N N/A Were field duplicate pairs identified in this SDG? Y N N/A Were target compounds detected in the field duplicate pairs?	ified in this SDG? ed in the field duplicate pa	irs?		,
Commoning	Concentration (Mg/kg)	(ng/kg)	%RPD	Qualification
	7	К	Limit	Parent only / All Samples
DRO	11 0000	106 000	10 pm (4 44 000 0) 21	
080	25/10 000	94,000	000 11	<u></u>
			*	
	Concentration (()	%RPD	Qualification
Compound	<i>*</i>		Limit	Parent only / All Samples
	-			

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:

Tronox LLC Facility, 2009 Phase B Investigation,

Henderson, Nevada

Collection Date:

June 25 through June 30, 2009

LDC Report Date:

September 24, 2009

Matrix:

Soil/Water

Parameters:

Total Petroleum Hydrocarbons as Extractables

Validation Level:

Stage 2B

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903584

Sample Identification

SA202-10B

SA202-28B

RSAI3-10B

RSAI3-20B

RSAI3-32B

SA188-0.5B

SA172-0.5B

SA41-0.5B

SA44-0.5B

SA42-0.5B

RSAI2-10B

RSAI2009-10B

RSAI2-20B

RSAI2-31B

RSAJ2-10B

RSAJ2-20B

RSAJ2-33B

RSAJ2009-33B

EB062609-SO

RSAJ2-20BMS

RSAJ2-20BMSD

Introduction

This data review covers 20 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 8015B for Total Petroleum Hydrocarbons (TPH) as Extractables.

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 III.

Field duplicates are summarized in Section IX.

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.
- UJ 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. Calibration

a. Initial Calibration

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

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

b. Calibration Verification

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

III. Blanks

Method blanks were reviewed for each matrix as applicable. No total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

Sample EB062609-SO was identified as an equipment blank. No total petroleum hydrocarbons as extractable contaminants were found in this blank.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903584	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples RSAI2-10B and RSAI2009-10B and samples RSAJ2-33B and RSAJ2009-33B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG R0903584

SDG	Sample	Compound	Flag	A or P	Reason
R0903584	SA202-10B SA202-28B RSAI3-10B RSAI3-20B RSAI3-32B SA188-0.5B SA172-0.5B SA41-0.5B SA44-0.5B SA42-0.5B RSAI2-10B RSAI2-10B RSAI2-20B RSAI2-31B RSAI2-31B RSAI2-31B RSAJ2-10B RSAJ2-20B RSAJ2-33B RSAJ2-33B RSAJ2-33B RSAJ2-09-33B EB062609-SO	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification Summary - SDG R0903584

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification Summary - SDG R0903584

No Sample Data Qualified in this SDG

Tronox Northgate Henderson VALIDATION COMPLETENESS WORKSHEET

LDC #: 21495K8 SDG #: R0903584

Stage 2B

Laboratory: Columbia Analytical Services

Page: 1 of

Reviewer: 314 2nd Reviewer:_

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
1.	Technical holding times	l A	Sampling dates: 6/25 - 30 /0 q
lla.	Initial calibration	A	
IIb.	Calibration verification/ICV	A	car/1ar ≤ 20 }
111.	Blanks	Α	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	US/D
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	$D_1 = 11, 12$ $D_2 = 17, 18$
X.	Field blanks	ND	EB = 19

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:

Con'l + Water

	3011	, ,	raur				
1	SA202-10B S	11	RSAI2-10B DI S	21	RSAJ2-20BMSD	31	90 359 MB
2	SA202-28B	12	RSAI2009-10B D, 1	22		32	90591
3	RSAI3-10B	13	RSAI2-20B	23		33 3	90635
4	RSAI3-20B	14	RSAI2-31B	24		34	
5	RSAI3-32B	15	RSAJ2-10B	25		35	·
6	SA188-0.5B	16	RSAJ2-20B	26		36	
7	SA172-0.5B	- 17	RSAJ2-33B ₽ _γ	27		37	
¥ 8	SA41-0.5B	18 3	RSAJ2009-33B b√ √	28		38	
9	SA44-0.5B	19	EB062609-SO η	29		39	
+ ~ 10	SA42-0.5B	20	RSAJ2-20BMS	30		40	

Notes:			
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Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name:

Tronox LLC Facility, 2009 Phase B Investigation,

Henderson, Nevada

Collection Date:

July 6 through July 7, 2009

LDC Report Date:

September 24, 2009

Matrix:

Soil

Parameters:

Total Petroleum Hydrocarbons as Extractables

Validation Level:

Stage 2B

Laboratory:

Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0903729

Sample Identification

SA206-0.5B

SA206-10B

SA206-25B

SA206-30B

RSAK4-10B

RSAK4-20B

RSAK4-31B

RSAL4-0.5B

RSAL4009-0.5B

RSAL4-10B

RSAL4-28B

SA100-10B

SA100-30B

SA69-0.5B

SA69-10B

SA69-29B

SA206-30BMS

SA206-30BMSD

SA100-10BMS

SA100-10BMSD

Introduction

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b. Calibration Verification

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

III. Blanks

Method blanks were reviewed for each matrix as applicable. No total petroleum hydrocarbons as extractable contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

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

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0903729	All compounds reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples RSAL4-0.5B and RSAL4009-0.5B were identified as field duplicates. No total petroleum hydrocarbons as extractables were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Data Qualification Summary - SDG R0903729

SDG	Sample	Compound	Flag	A or P	Reason
R0903729	SA206-0.5B SA206-10B SA206-25B SA206-30B RSAK4-10B RSAK4-20B RSAK4-31B RSAL4-0.5B RSAL4-0.5B RSAL4-10B RSAL4-10B RSAL4-28B SA100-10B SA100-30B SA69-0.5B SA69-10B SA69-29B	All compounds reported below the PQL.	J (all detects)	А	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Laboratory Blank Data Qualification Summary - SDG R0903729

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada Total Petroleum Hydrocarbons as Extractables - Field Blank Data Qualification Summary - SDG R0903729

No Sample Data Qualified in this SDG

Tronox Northgate Henderson VALIDATION COMPLETENESS WORKSHEET

S	DG	#:	R090	3	729	 				
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LDC #: 21495L8

Stage 2B

raye	LOI
Reviewer:	3/6
2nd Reviewer:	

Laboratory: Columbia Analytical Services

METHOD: GC TPH as Extractables (EPA SW 846 Method 8015B)

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

	Validation Area		Comments
1.	Technical holding times	A	Sampling dates: 7/06 - 07/69
lla.	Initial calibration	Ą	
llb.	Calibration verification/ICV	A	CW/1W =202
111.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	US/b
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D = 8,9
X.	Field blanks	N	

Note:

A = Acceptable

N = Not provided/applicable

SW = See worksheet

ND = No compounds detected

R = Rinsate FB = Field blank D = Duplicate

TB = Trip blank

EB = Equipment blank

Validated Samples:

501

	<i>></i> 0	<u> </u>					
1 1	SA206-0.5B	11	RSAL4-28B	21 /	90 882 MB	31	
2	SA206-10B	12	SA100-10B	22 7	90954 MB	32	
3 1	SA206-25B	13	SA100-30B	23		33	
4 Ì	SA206-30B	14	SA69-0.5B	24		34	
5	RSAK4-10B	15	SA69-10B	25		35	
6 1	RSAK4-20B	16	SA69-29B	26		36	
7 (RSAK4-31B	17	SA206-30BMS	27		37	
8 >	RSAL4-0.5B	18	SA206-30BMSD	28		38	
9 >	RSAL4009-0.5B	19	SA100-10BMS	29	(39	
10	RSAL4-10B	20	SA100-10BMSD	30		40	

Notes:_			