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

Februayr 3, 2010

SUBJECT: Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada, Data Validation

Dear Ms. Arnold,

Enclosed is the revised data validation report for the fractions listed below. The data validation was performed under Stage 2B & 4 guidelines. Please replace the previously submitted report with the enclosed revised report.

LDC Project # 21768:

SDG #	Fraction
R0904797	Chlorinated Pesticides, Cyanide, Gasoline Range Organics

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

Sincerely,

ERauto

Erlinda T. Rauto
Operations Manager/Senior Chemist

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: August 24 through August 26, 2009

LDC Report Date: February 2, 2010

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: Stage 2B & 4

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0904797

Sample Identification

SA154-0.5B**
SA154-10B**
SA154-33B
RSAS3-0.5B
RSAS3009-0.5B
RSAS3-10B
RSAS3-25B
RSAS3-44B
SA154-0.5BMS
SA154-0.5BMSD
RSAS3-0.5BMS
RSAS3-0.5BMSD

**Indicates sample underwent Stage 4 review.

Introduction

This data review covers 12 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8081A for Chlorinated Pesticides.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review (June 2008) as there are no current guidelines for the method stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Samples indicated by a double asterisk on the front cover underwent a Stage 4 review. A Stage 2B review was performed on all other samples. Raw data were not evaluated for the samples reviewed by Stage 2B criteria since this review is 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. GC/ECD Instrument Performance Check

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

III. Initial Calibration

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

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

Retention time windows were evaluated and considered technically acceptable for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples on which a Stage 2B review was performed.

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

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

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

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

Retention time windows were evaluated and considered technically acceptable for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples on which a Stage 2B review was performed.

V. Blanks

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

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

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	alpha-BHC	0.092 ug/L	SA154-0.5B** SA154-10B** SA154-33B

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

VI. Surrogate Spikes

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

Sample	Column	Surrogate	%R (Limits)	Compound	Flag	A or P
95021MB	Not specified	Tetrachloro-m-xylene	25 (40-140)	All TCL compounds	J- (all detects) UJ (all non-detects)	P

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Although the MS/MSD percent recoveries (%R) and relative percent differences (RPD) were not within QC limits for several compounds, the MS, MSD, LCS, or LCSD percent recoveries (%R) were within QC limits and no data were qualified.

VIII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. Although the LCS/LCSD percent recoveries (%R) were not within QC limits for some compounds, the MS percent recovery (%R) was within QC limits and no data were qualified.

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Pesticide Cleanup Checks

a. Florisil Cartridge Check

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

b. GPC Calibration

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

XI. Target Compound Identification

All target compound identifications were within validation criteria for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

XII. Project Quantitation Limit

All project quantitation limits were within validation criteria for samples on which a Stage 4 review was performed.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0904797	All compounds reported below the PQL.	J (all detects)	A

Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

Samples RSAS3-0.5B and RSAS3009-0.5B were identified as field duplicates. No chlorinated pesticides were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	RSAS3-0.5B	RSAS3009-0.5B				
beta-BHC	1.6	2.0	-	0.4 (≤1.8)	-	-

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Data Qualification Summary - SDG R0904797

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0904797	SA154-0.5B** SA154-10B** SA154-33B RSAS3-0.5B RSAS3009-0.5B RSAS3-10B RSAS3-25B RSAS3-44B	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG R0904797

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG R0904797

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B/4

LDC #: 21768F3a
SDG #: R0904797
Laboratory: Columbia Analytical Services

Date: 10/23/09
Page: 1 of 1
Reviewer: SVG
2nd Reviewer: [signature]

METHOD: GC Chlorinated Pesticides (EPA SW 846 Method 8081A)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 8/24-26/09
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	%RSD ≤20%
IV.	Continuing calibration/ICV	A	CCV/ICV ≤20%
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	SW	D = 9, 5
XV.	Field blanks	SW	FB = FB072909-SO (R0904226) ↓ FFB080309-SO (R0904279)

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

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

D = Duplicate
TB = Trip blank
EB = Equipment blank

Validated Samples: Soil

1	SA154-0.5B *+	11	RSAS3-0.5BMS	21	95021 MB	31	
2	SA154-10B *+	12	RSAS3-0.5BMSD	22	95417	32	
3	SA154-33B	13		23		33	
4	RSAS3-0.5B D	14		24		34	
5	RSAS3009-0.5B D	15		25		35	
6	RSAS3-10B	16		26		36	
7	RSAS3-25B	17		27		37	
8	RSAS3-44B	18		28		38	
9	SA154-0.5BMS +*	19		29		39	
10	SA154-0.5BMSD +*	20		30		40	

LDC #: 21768 F3a
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVG
2nd Reviewer: 1

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

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. GC/ECD Instrument performance check				
Was the instrument performance found to be acceptable?	✓			
III. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Was a linear fit used for evaluation? If yes, were all percent relative standard deviations (%RSD) ≤ 20%?	✓			
Was a curve fit used for evaluation? If Yes, what was the acceptance criteria used?		✓		
Did the initial calibration meet the curve fit acceptance criteria?			✓	
Were the RT windows properly established?	✓			
Were the required standard concentrations analyzed in the initial calibration?	✓			
IV. Continuing calibration				
What type of continuing calibration calculation was performed? ✓ %D or ____%R	✓			
Were Evaluation mix standards analyzed prior to the initial calibration and sample analysis?	✓			
Were endrin and 4,4'-DDT breakdowns ≤ ~~15%~~ 15 for individual breakdown in the Evaluation mix standards?	✓			
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 20% or percent recovieries 80-120%?	✓			
Were all the retention times within the acceptance windows?	✓			
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed for each matrix and concentration?	✓			
Were extract cleanup blanks analyzed with every batch requiring clean-up?	✓			
Was there contamination in the method blanks or clean-up blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
VI. Surrogate spikes				
Were all surrogate %R within the QC limits?		✓		
If the percent recovery (%R) of one or more surrogates was outside QC limits, was a reanalysis performed to confirm %R?		✓		
If any %R was less than 10 percent, was a reanalysis performed to confirm %R?			✓	
VII. Matrix spike/Matrix spike duplicates				

LDC #: 21768#39
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVG
2nd Reviewer:

Validation Area	Yes	No	NA	Findings/Comments
Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.	✓			
Was a MS/MSD analyzed every 20 samples of each matrix?	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?		✓		
VIII. Laboratory control samples				
Was an LCS analyzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?		✓		
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	
X. Target compound identification				
Were the retention times of reported detects within the RT windows?	✓			
XI. Compound quantitation/CRQLs				
Were compound quantitation and CRQLs adjusted to reflect all sample dilutions, dry weight factors, and clean-up activities applicable to level IV validation?	✓			
XII. System performance				
System performance was found to be acceptable.	✓			
XIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.		✓		
XIV. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target compounds were detected in the field duplicates.			✓	
XV. Field blanks				
Field blanks were identified in this SDG.	✓			
Target compounds were detected in the field blanks.	✓			

VALIDATION FINDINGS WORKSHEET

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

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

Notes: _____

LDC #: 21768 F31
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: SVG
2nd Reviewer: [illegible]

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

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

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

Blank units: ug/L **Associated sample units:** ug/Kg

Sampling date: 7/29/09

Field blank type: (circle one) Field Blank / Rinsate / Other:_____ Associated Samples: 1-3 (ND)

Compound	Blank ID	Sample Identification								
	FB072909-SO									
A	0.092									
CRQL										

Blank units:_____ **Associated sample units:**_____

Sampling date:_____

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

Compound	Blank ID	Sample Identification								
CRQL										

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:

Samples with compound concentrations within five times the associated field blank concentration are listed above, these sample results were qualified as not detected, "U".

LDC #: 21768F39
SDG #: Eur Conv

VALIDATION FINDINGS WORKSHEET
Surrogate Spikes

Reviewer: JVG
2nd Reviewer: [signature]

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

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

#	Date	Sample ID	Column	Surrogate Compound	%R (Limits)	Qualifications
		95021 MB	Not Spec.	A	25 (40-140)	J-/UJ/P (S)
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
					( )	
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					( )	
					( )	
					( )	
					( )	
					( )	
					( )	

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

LDC #: 21768F3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

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

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

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

(Y) N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG?
(Y) N N/A Was a MS/MSD analyzed every 20 samples for each matrix or whenever a sample extraction was performed?
Y (N) N/A Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		9/10	Several	compounds)	have %R	and % RPDs)	1	No qual
			out	side limits)	( )	( )		(either MS; MSD
			(see	attached	summary report)	( )		or LCS/D in)
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
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COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Northgate Environmental	**Service Request:**	R0904797
Project:	Tronox LLC Henderson/2027.001	**Date Collected:**	8/24/09
Sample Matrix:	Soil	**Date Received:**	8/25/09
		Date Analyzed:	9/ 8/09

Matrix Spike Summary
Organochlorine Pesticides by Gas Chromatography

Sample Name:	SA154-0.5B	**Units:**	µg/Kg
Lab Code:	R0904797-009	**Basis:**	Dry

Analytical Method: 8081A
Prep Method: EPA 3541

Analyte Name	Sample Result	Matrix Spike RQ0908029-04 Result	Amount	% Rec		Duplicate Matrix Spike RQ0908029-05 Result	Amount	% Rec		% Rec Limits		RPD		RPD Limit
4,4'-DDD	ND	6.65	7.15	93		9.04	7.15	126	*	58 - 121		31	*	30
4,4'-DDE	ND	15.3	7.15	214	*	21.0	7.15	293	*	56 - 125		31	*	30
4,4'-DDT	ND	8.75	7.15	122		14.1	7.15	197	*	9 - 149		47	*	30
Aldrin	ND	5.68	7.15	79		8.36	7.15	117		15 - 135		38	*	30
Dieldrin	ND	6.11	7.15	85		9.65	7.15	135		25 - 150		45	*	30
Endosulfan I	ND	7.11	7.15	99		9.07	7.15	127	*	56 - 119		24		30
Endosulfan II	ND	7.61	7.15	106		10.9	7.15	152	*	65 - 127		36	*	30
Endosulfan Sulfate	ND	6.29	7.15	88		8.97	7.15	125	*	37 - 122		35	*	30
Endrin	ND	6.75	7.15	94		10.0	7.15	140		28 - 143		39	*	30
Endrin Aldehyde	ND	5.39	7.15	75		8.90	7.15	124		18 - 135		49	*	30
Endrin Ketone	ND	6.18	7.15	86		9.25	7.15	129	*	57 - 123		40	*	30
Heptachlor	ND	6.75	7.15	94		9.32	7.15	130	*	35 - 127		32	*	30
Heptachlor Epoxide	ND	7.79	7.15	109		10.8	7.15	151	*	61 - 120		32	*	30
Hexachlorobenzene	44	53.7	17.9	53		76.7	17.9	182	*	20 - 150		35	*	30
Methoxychlor	ND	42.2	35.7	118		53.2	35.7	149		38 - 149		23		30
alpha-BHC	ND	5.93	7.15	83		8.65	7.15	121		53 - 130		37	*	30
alpha-Chlordane	ND	5.93	7.15	83		8.72	7.15	122		27 - 130		38	*	30
beta-BHC	ND	12.1	7.15	170	*	16.3	7.15	227	*	35 - 142		29		30
delta-BHC	ND	5.22	7.15	73		6.90	7.15	96		44 - 119		28		30
gamma-BHC (Lindane)	ND	5.93	7.15	83		8.68	7.15	121		37 - 124		38	*	30
gamma-Chlordane	ND	8.90	7.15	124		12.2	7.15	171	*	38 - 127		31	*	30

Comments:

LDC #: 21768F3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET

Laboratory Control Samples

Reviewer: JVG
2nd Reviewer: [illegible]

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

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

(Y) N N/A — Were a laboratory control samples (LCS) and laboratory control sample duplicate (LCSD) analyzed for each matrix in this SDG?

Y (N) N/A — Were the LCS percent recoveries (%R) and relative percent differences (RPD) within the QC limits?

Level ~~IV/D~~ Only

Y N (N/A) — Was a LCS analyzed every 20 samples for each matrix or whenever a sample extraction was performed?

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		95021 LCS/D	EE	43 (50-130)	45 (50-130)	( )	1-3, 5-8, 95021 MB	No qual (MS in)
				( )	( )	( )		
				( )	( )	( )		
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LDC #: 21768 F 39
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: AR
2nd reviewer: [signature]

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

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

Compound	Concentration (ug/kg)		RPD
	4	5	
B	1.6	2.0	0.4 (≤ 1.8 D)

Compound	Concentration ( )		RPD

Compound	Concentration ( )		RPD

Compound	Concentration ( )		RPD

LDC #: 21768F39a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Page: 1 of 1
Reviewer: SVG
2nd Reviewer: e

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

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

CF = A/C
Average CF = sum of the CF/number of standards
%RSD = 100 * (S/X)

Where: A = Area of compound
C = Concentration of compound
S = Standard deviation of calibration factors
X = Mean of calibration factors

#	Standard ID	Calibration Date	Compound	Reported CF (10 std)	Recalculated CF (10 std)	Reported CF (initial)	Recalculated CF (intial)	Reported %RSD	Recalculated %RSD
1	ICAL	8/28/09	H STX-CLP1	2.094 e7	2.094 e7	2.179 e7	2.179 e7	3.59	3.59
			p I (1D)	0.975	0.9748	0.991	0.991	1.67	1.67
			H γ	5.89%	5.89%	5.988	5.987	1.14	1.14
			p γ (1D)	2.430	2.4303	2.49%	2.49%	3.15	3.15
2									
3									
4									

Comments: Refer to Initial Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21768F3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Reviewer: JV6
2nd Reviewer: e

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

Percent difference (%D) = 100 * (N - C)/N

Where: N = __ Initial Calibration Factor or __ Nominal Amount (ng)
C = __ Calibration Factor from Continuing Calibration Standard or __ Calculated Amount (ng)

#	Standard ID	Calibration Date/Time	Compound	Average CF/ CCV Conc	Reported CF/Conc CCV	Recalculated CF/Conc CCV	Reported %D	Recalculated %D
1	CCV18A	9/08/09	H (SX cup)	21.794 e6	22.081 e6	22.08 e6	1.3	1.3
			P 1	9.914	9.693	9.673	2.4	2.4
			H 2	59.876	67.628	67.63	12.9	12.95
			P 2	24.917	25.539	25.539	2.5	2.5
2	CCV21A	9/09/09	H 1		22.130	22.13	1.5	1.5
			P 1		9.689	9.689	2.3	2.3
			H 2		64.913	64.913	8.4	8.4
			P 2		25.089	25.089	0.7	0.7
3								
4								

Comments: Refer to Continuing Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21768 F3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

Reviewer: JVG
2nd reviewer: Q

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

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

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: 1

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Tetrachloro-m-xylene						
Tetrachloro-m-xylene	STX-CLP2	100	8.607 (10)	86	86	0
Decachlorobiphenyl	↓	↓	9.628 ↓	96	96	↓
Decachlorobiphenyl						

Sample ID:

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Tetrachloro-m-xylene						
Tetrachloro-m-xylene						
Decachlorobiphenyl						
Decachlorobiphenyl						

Sample ID:

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Tetrachloro-m-xylene						
Tetrachloro-m-xylene						
Decachlorobiphenyl						
Decachlorobiphenyl						

Sample ID:

Surrogate	Column	Surrogate Spiked	Surrogate Found	Percent Recovery Reported	Percent Recovery Recalculated	Percent Difference
Tetrachloro-m-xylene						
Tetrachloro-m-xylene						
Decachlorobiphenyl						
Decachlorobiphenyl						

Notes:

LDC #: 21768F3a
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Reviewer: JVG
2nd Reviewer: [illegible]

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

The percent recoveries (%R) and Relative Percent difference (RPD) of the matrix spike and matrix spike duplicate were recalculated for the compounds identified below using the following calculation:

% Recovery = 100* (SSC-SC)/SA

Where: SSC = Spiked sample concentration
SA = Spike added
SC = Concentration

RPD = | MS - MSD | * 2/(MS + MSD)

MS = Matrix spike percent recovery
MSD = Matrix spike duplicate percent recovery

MS/MSD samples: 3/4

Compound	Spike Added (ug/kg)		Sample Concentration (ug/kg)	Spiked Sample Concentration (ug/kg)		Matrix Spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD		MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalculated
gamma-BHC	7.15	7.15	0	5.93	8.68	83	83	121	121	38	38
4,4'-DDT	↓	↓	↓	8.75	14.1	122	122	157	197	47	47
Aroclor 1260											

Comments: Refer ot Matrix Spike/Matrix Spike Duplicates findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21768 F3A
SDG #: See Cover

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

Reviewer: JM
2nd Reviewer: JR

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

The percent recoveries (%R) and Relative Percent difference (RPD) of the laboratory control sample and laboratory control sample duplicate were recalculated for the compounds identified below using the following calculation:

% Recovery = 100* (SSC-SC)/SA

Where: SSC = Spiked sample concentration
SA = Spike added
SC = Concentration

RPD = I LCS - LCSD I * 2/(LCS + LCSD)

LCS = Laboratory control sample percent recovery
LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: 95021 LCS/D

Compound	Spike Added (ug/kg)		Spiked Sample Concentration (ug/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
gamma-BHC	6.67	6.67	3.58	3.83	54	54	57	57	7	7
4,4'-DDT	↓	↓	6.88	6.76	103	103	101	101	2	2
Aroclor 1260										

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

LDC #: 21768F36
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

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

Y N N/A Were all reported results recalculated and verified for all level IV samples?
Y N N/A Were all recalculated results for detected target compounds agree within 10.0% of the reported results?

STX-CUPR

Example:

Sample I.D. #1 EE:

$$\text{Conc.} = \frac{(1219.9\ eG)(10ml)(10)}{(0.9848)(0.933)(30g)}$$

$= 44.29$

$\approx 44\ ug/kg$

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

Note: _____

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: August 24, 2009

LDC Report Date: February 2, 2010

Matrix: Soil

Parameters: Cyanide

Validation Level: Stage 4

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0904797

Sample Identification

SA154-0.5B

Introduction

This data review covers one soil sample listed on the cover sheet. The analyses were per EPA SW 846 Method 9012A for Cyanide.

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 Inorganic Data Review (October 2004) 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 X.

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

Calibration verification frequency and analysis criteria were met.

III. Blanks

Method blanks were reviewed for each matrix as applicable. No cyanide was found in the initial, continuing and preparation blanks.

Samples FB072909-SO (from SDG R0904226) was identified as a field blank. No contaminant concentrations were found in this blank.

IV. Matrix Spike/Matrix Spike Duplicates

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

V. Duplicates

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

VI. Laboratory Control Samples

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

VII. Sample Result Verification and Project Quantitation Limit

All sample result verifications were acceptable.

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG R0904797	All analytes reported below the PQL.	J (all detects)	A

VIII. Overall Assessment

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
Cyanide - Data Qualification Summary - SDG R0904797

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
R0904797	SA154-0.5B	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Cyanide - Laboratory Blank Data Qualification Summary - SDG R0904797

No Sample Data Qualified in this SDG

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Cyanide - Field Blank Data Qualification Summary - SDG R0904797

No Sample Data Qualified in this SDG

LDC #: 21768F6 b
SDG #: R0904797
Laboratory: Columbia Analytical Services

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 4

Date: 2-1-10
Page: 1 of 1
Reviewer: CR
2nd Reviewer: [illegible]

METHOD: (Analyte) Cyanide (EPA SW846 Method 9012A)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 8/24/09
IIa.	Initial calibration	A	
IIb.	Calibration verification	A	
III.	Blanks	A	
IV	Surrogate Spikes	N	Not required
V	Matrix Spike/Matrix Spike Duplicates	N	Client specified
VI.	Duplicates	N	↓
VII.	Laboratory control samples	A	LCS
VIII.	Sample result verification	A	
IX.	Overall assessment of data	A	
X.	Field duplicates	N	
XI	Field blanks	ND	FB=FB072909-SO (SDG# R0904226)

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

Validated Samples: Soil

1	SA154-0.5B	11	PBS	21		31	
2		12		22		32	
3		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: _____

LDC #: 21768F6
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Reviewer: CR
2nd Reviewer:

Method: Inorganics (EPA Method see cover)

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Calibration				
Were all instruments calibrated daily, each set-up time?	✓			
Were the proper number of standards used?	✓			
Were all initial calibration correlation coefficients ≥ 0.995?	✓			
Were all initial and continuing calibration verification %Rs within the 90-110% QC limits?	✓			
Were titrant checks performed as required? (Level IV only)			✓	
Were balance checks performed as required? (Level IV only)			✓	
III. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
IV. Matrix spike/Matrix spike duplicates and Duplicates				
Were a matrix spike (MS) and duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD or MS/DUP. Soil / Water.		✓		Client specified
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the 75-125 QC limits? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.			✓	↓
Were the MS/MSD or duplicate relative percent differences (RPD) ≤ 20% for waters and ≤ 35% for soil samples? A control limit of ≤ CRDL(≤ 2X CRDL for soil) was used for samples that were ≤ 5X the CRDL, including when only one of the duplicate sample values were < 5X the CRDL.			✓	↓
V. Laboratory control samples				
Was an LCS anaylzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the 80-120% (85-115% for Method 300.0) QC limits?	✓			
VI. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	

LDC #: 21768F6
SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Reviewer: CR
2nd Reviewer: W

Validation Area	Yes	No	NA	Findings/Comments
VII. Sample Result Verification				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
Were detection limits < RL?	✓			
VIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
IX. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target analytes were detected in the field duplicates.			✓	
X. Field blanks				
Field blanks were identified in this SDG.	✓			
Target analytes were detected in the field blanks.		✓		

LDC #: 21768F6
SDG #: see cover

Validatin Findings Worksheet
Initial and Continuing Calibration Calculation Verification

Reviewer: CR
2nd Reviewer: ✓

Method: Inorganics, Method see cover

The correlation coefficient (r) for the calibration of CN was recalculated.Calibration date: 9/1/09

An initial or continuing calibration verification percent recovery (%R) was recalculated for each type of analysis using the following formula:

$$\%R = \frac{\text{Found} \times 100}{\text{True}}$$

Where, Found = concentration of each analyte measured in the analysis of the ICV or CCV solution
True = concentration of each analyte in the ICV or CCV source

Type of analysis	Analyte	Standard	Conc. ~~(ug/l)~~ mg/L	~~Area~~ Response	Recalculated r or r^2	Reported r or r^2	Acceptable (Y/N)
Initial calibration	CN	s1	0	0.00824	*0.999940*	0.999940	Y
		s2	0.01	0.01763			
		s3	0.02	0.02561			
		s4	0.05	0.05518			
		s5	0.1	0.10535			
		s6	0.2	0.20435			
		s7	0.5	0.48191			
		s8	1	0.95541			
Calibration verification	CN	ICV	0.5	Found(mg/L) 0.50505	101	–	
Calibration verification	↓	CCV	↓	0.49679	99	–	
Calibration verification	↓	CCV	↓	0.51871	104	–	↓

Comments: Refer to Calibration Verification findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 22176BF6
SDG #: Seecover

VALIDATION FINDINGS WORKSHEET
Level IV Recalculation Worksheet

Page: 1 of 1
Reviewer: GR
2nd Reviewer: [illegible]

METHOD: Inorganics, Method Seecover

Percent recoveries (%R) for a laboratory control sample and a matrix spike sample were recalculated using the following formula:

$$\%R = \frac{Found}{True} \times 100$$ Where,

Found = concentration of each analyte measured in the analysis of the sample. For the matrix spike calculation, Found = SSR (spiked sample result) - SR (sample result).

True = concentration of each analyte in the source.

A sample and duplicate relative percent difference (RPD) was recalculated using the following formula:

$$RPD = \frac{|S-D|}{(S+D)/2} \times 100$$ Where,

S = Original sample concentration

D = Duplicate sample concentration

Sample ID	Type of Analysis	Element	Found / S (units)	True / D (units)	Recalculated %R / RPD	Reported %R / RPD	Acceptable (Y/N)
LCS	Laboratory control sample	CN	4.71	5.0	94	94	Y
N	Matrix spike sample		(SSR-SR)				
N	Duplicate sample						

Comments: Refer to appropriate worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 47688F6
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Page: 1 of 1
Reviewer: CR
2nd reviewer: LW

METHOD: Inorganics, Method see cover

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

Y N N/A Have results been reported and calculated correctly?
Y N N/A Are results within the calibrated range of the instruments?
Y N N/A Are all detection limits below the CRQL?

Compound (analyte) results for CN reported with a positive detect were recalculated and verified using the following equation:

Concentration = Recalculation:

Non Detect

#	Sample ID	Analyte	Reported Concentration ( )	Calculated Concentration ( )	Acceptable (Y/N)

Note:

Laboratory Data Consultants, Inc.
Data Validation Report

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

Collection Date: August 24 through August 26, 2009

LDC Report Date: February 2, 2010

Matrix: Soil/Water

Parameters: Gasoline Range Organics

Validation Level: Stage 2B & 4

Laboratory: Columbia Analytical Services, Inc.

Sample Delivery Group (SDG): R0904797

Sample Identification

SA154-0.5B**
SA154-10B**
SA154-20B**
SA154-33B**
SA200-31B**
SA200009-31B
SA200-10B**
SA200-20B**
SA200-31BMS
SA200-31BMSD

**Indicates sample underwent Stage 4 review.

Introduction

This data review covers 10 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.

Samples indicated by a double asterisk on the front cover underwent a Stage 4 review. A Stage 2B review was performed on all other samples. Raw data were not evaluated for the samples reviewed by Stage 2B criteria since this review is 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 FB072909-SO (from SDG R0904226) was identified as a field blank. No gasoline range organic contaminants were found in this blank with the following exceptions:

Field Blank ID	Sampling Date	Compound	Concentration	Associated Samples
FB072909-SO	7/29/09	Gasoline range organics	27 ug/L	All samples in SDG R0904797

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

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

All target compound identifications were within validation criteria for samples on which a Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

VI. Project Quantitation Limit

All project quantitation limits were within validation criteria for samples on which a Stage 4 review was performed.

Sample	Finding	Flag	A or P
All samples in SDG R0904797	All compounds reported below the PQL.	J (all detects)	A

Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

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 SA200-31B and SA200009-31B were identified as field duplicates. No gasoline range organics were detected in any of the samples.

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Data Qualification Summary - SDG R0904797

SDG	Sample	Compound	Flag	A or P	Reason (Code)
R0904797	SA154-0.5B** SA154-10B** SA154-20B** SA154-33B** SA200-31B** SA200009-31B SA200-10B** SA200-20B**	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)

Tronox LLC Facility, 2009 Phase B Investigation, Henderson, Nevada
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG R0904797

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 R0904797

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B /4

LDC #: 21768F7
SDG #: R0904797
Laboratory: Columbia Analytical Services

Date: 10/23/09
Page: 1 of 1
Reviewer: JV
2nd Reviewer: [signature]

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: 8/24 - 26/09
IIa.	Initial calibration	A	%RSD ≤ 20%
IIb.	Calibration verification/~~ICV~~	A	CCV ≤ 20%
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	
IVc.	Laboratory control samples	A	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 = 5,6
X.	Field blanks	SW	FB = FB072909-SO (R0904226)

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:
** Level IV Soil

1	SA154-0.5B **	11	167733MB	21		31		
2	SA154-10B **	12	169325	22		32		
3	SA154-20B **	13		23		33		
4	SA154-33B **	14		24		34		
5	SA200-31B ** D	15		25		35		
6	SA200009-31B D	16		26		36		
7	SA200-10B **	17		27		37		
8	SA200-20B **	18		28		38		
9	SA200-31BMS	19		29		39		
10	SA200-31BMSD	20		30		40		

Notes: _____

LDC #: 21768F7
SDG #: see Cover

VALIDATION FINDINGS CHECKLIST

Page: 1 of 2
Reviewer: JVL
2nd Reviewer: [illegible]

Method: ✓ GC ____ HPLC

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓			
Cooler temperature criteria was met.	✓			
II. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	✓			
Were all percent relative standard deviations (%RSD) ≤ 20%?	✓			
Was a curve fit used for evaluation?		✓		
Did the initial calibration meet the curve fit acceptance criteria of ≥ 0.990?			✓	
Were the RT windows properly established?	✓			
IV. Continuing calibration				
Was a continuing calibration analyzed daily?	✓			
Were all percent differences (%D) ≤ 20%.0 or percent recoveries 80-120%?	✓			
Were all the retention times within the acceptance windows?	✓			
V. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Was a method blank analyzed for each matrix and concentration?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		✓		
VI. Surrogate spikes				
Were all surrogate %R within the QC limits?	✓			
If the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R outside of criteria?			✓	
VII. Matrix spike/Matrix spike duplicates				
Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.	✓			
Was a MS/MSD analyzed every 20 samples of each matrix?	✓			
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?	✓			
VIII. Laboratory control samples				
Was an LCS analyzed for this SDG?	✓			
Was an LCS analyzed per extraction batch?	✓			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?	✓			
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?		✓		
Were the performance evaluation (PE) samples within the acceptance limits?			✓	

LDC #: 21768F7
SDG #: See Cover

VALIDATION FINDINGS CHECKLIST

Reviewer: JVC
2nd Reviewer: [signature]

Validation Area	Yes	No	NA	Findings/Comments
X. Target compound identification				
Were the retention times of reported detects within the RT windows?	✓			
XI. Compound quantitation/CRQLs				
Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
XII. System performance				
System performance was found to be acceptable.	✓			
XIII. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
XIV. Field duplicates				
Field duplicate pairs were identified in this SDG.	✓			
Target compounds were detected in the field duplicates.		✓		
XV. Field blanks				
Field blanks were identified in this SDG.	✓			
Target compounds were detected in the field blanks.	✓			

LDC #: 21768F7
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: JVG
2nd Reviewer: _____

METHOD: ✓ GC __ HPLC
Y N N/A Were field blanks identified in this SDG?
Y N N/A Were target compounds detected in the field blanks?
Blank units: ug/L Associated sample units: ug/Kg
Sampling date: 7/29/09
Field blank type: (circle one) Field Blank / Trip Blank / Atmospheric Blank / Ambient Blank
Rinsate / Equipment Rinsate / Equipment Blank / Source Blank / Other:
Associated Samples: All (ND)

Compound	Blank ID	Blank ID	Sample Identification							
[redacted]	FB072909-SO									
GRO	27									
CRQL										

Blank units: _____ Associated sample units: _____
Sampling date: _____
Field blank type: (circle one) Field Blank / Trip Blank/ Atmospheric Blank/ Ambient Blank
Rinsate / Equipment Rinsate / Equipment Blank / Source Blank / Other:
Associated Samples: _____

Compound	Blank ID	Blank ID	Sample Identification							
[redacted]										
CRQL										

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

LDC #: 21768F7
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

Reviewer: JV6
2nd Reviewer:

METHOD: GC ✓ HPLC_____

The calibration Factor (CF), average CF, and percent relative standard deviation (%RSD) were recalculated for the compounds identified below using the following calculations:

CF = A/C
average CF = sum of the CF/number of standards
%RSD = 100 * (S/X)

A = Area of compound,
C = Concentration of compound,
S = Standard deviation of the CF
X = Mean of the CFs

#	Standard ID	Calibration Date	Compound	Reported CF (1000 std)	Recalculated CF (1000 std)	Reported Average CF (initial)	Recalculated Average CF (initial)	Reported %RSD	Recalculated %RSD
1	ICAL	7/04/08	Gasoline (C4-C10)	0.9334	0.9334	0.8976	0.8976	8	8
2	ICAL	9/07/09	↓	0.2107	0.2107	0.2058	0.2058	5	5
3									
4									

Comments: Refer to Initial Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21768F7
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

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

METHOD: GC ✓ HPLC_____

The percent difference (%D) of the initial calibration average Calibration Factors (CF) and the continuing calibration CF were recalculated for the compounds identified below using the following calculation:

% Difference = 100 * (ave. CF - CF)/ave. CF
CF = A/C

Where: ave. CF = initial calibration average CF
CF = continuing calibration CF
A = Area of compound
C = Concentration of compound

#	Standard ID	Calibration Date	Compound	Average CF(ical)/ CCV Conc.	Reported CF/Conc. CCV	Recalculated CF/Conc. CCV	Reported %D	Recalculated %D
1	CCV	8/27/09	Gasoline (C_6-C_{10})	0.8976	0.9068	0.9068	1E	1
			↓					
2		9/08/09		0.2058	0.2103	0.2103	✓	✓
3								
4								

Comments: Refer to Continuing Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21768F7
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Surrogate Results Verification

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

METHOD: ✓ GC ___ HPLC

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

% Recovery: SF/SS * 100

Where: SF = Surrogate Found
SS = Surrogate Spiked

Sample ID: #1

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	
3-Fluorochlorobenzene	FID	30	26.913	90	90	0

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	

Sample ID:

Surrogate	Column/Detector	Surrogate Spiked	Surrogate Found	Percent Recovery	Percent Recovery	Percent Difference
				Reported	Recalculated	

LDC #: 27268 F7
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

Page: 1 of 1
Reviewer: JG
2nd Reviewer: [illegible]

METHOD: ✓ **GC** __ **HPLC**

The percent recoveries (%R) and relative percent differences (RPD) of the matrix spike and matrix spike duplicate were recalculated for the compounds identified below using the following calculation:

%Recovery = 100 * (SSC - SC)/SA

RPD =(({SSCMS - SSCMSD} * 2) / (SSCMS + SSCMSD))*100

Where SSC = Spiked sample concentration
SC = Sample concentration
SA = Spike added

MS = Matrix spike
MSD = Matrix spike duplicate

MS/MSD samples: 8/9

Compound	Spike Added (ug/kg)		Sample Conc. (ug/kg)	Spike Sample Concentration (ug/kg)		Matrix spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		MS/MSD RPD	
	MS	MSD	---	MS	MSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)	51200	51200	0	48600	43800	95	95	86	86	10	10
Diesel (8015)											
Benzene (8021B)											
Methane (RSK-175)											
2,4-D (8151)											
Dinoseb (8151)											
Naphthalene (8310)											
Anthracene (8310)											
HMX (8330)											
2,4,6-Trinitrotoluene (8330)											

Comments: Refer to Matrix Spike/Matrix Spike Duplicates findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 21768F7
SDG #: See Cover

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

Page: 1 of 1
Reviewer: JV
2nd Reviewer:

/

METHOD: ___ GC __HPLC

The percent recoveries (%R) and Relative Percent difference (RPD) of the laboratory control sample and laboratory control sample duplicate were recalculated for the compounds identified below using the following calculation:

% Recovery = 100* (SSC-SC)/SA
RPD = | LCS - LCSD | * 2/(LCS + LCSD)

Where: SSC = Spiked sample concentration
SA = Spike added
LCS = Laboratory control sample percent recovery
SC = Concentration
LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: 16 7733 LCS

Compound	Spike Added (ug/kg)		Spiked Sample Concentration (ug/kg)		LCS Percent Recovery		LCSD Percent Recovery		LCS/LCSD RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
Gasoline (8015)	500	NA	478	NA	96	96				
Diesel (8015)										
Benzene (8021B)										
Methane (RSK-175)										
2,4-D (8151)										
Dinoseb (8151)										
Naphthalene (8310)										
Anthracene (8310)										
HMX (8330)										
2,4,6-Trinitrotoluene (8330)										

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

LDC #: 21768F7
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

Reviewer: JVG
2nd Reviewer: e

METHOD: ✓ GC __ HPLC

Y N N/A Were all reported results recalculated and verified for all level IV samples?
Y N N/A Were all recalculated results for detected target compounds within 10% of the reported results?

Concentration= $\frac{(A)(Fv)(Df)}{(RF)(Vs \text{ or } Ws)(\%S/100)}$

A= Area or height of the compound to be measured
Fv= Final Volume of extract
Df= Dilution Factor
RF= Average response factor of the compound in the initial calibration
Vs= Initial volume of the sample
Ws= Initial weight of the sample
%S= Percent Solid

Example:

Sample ID._____ Compound Name ND

Concentration =_____

#	Sample ID	Compound	Reported Concentrations ( )	Recalculated Results Concentrations ( )	Qualifications

Comments: _____