

LABORATORY DATA CONSULTANTS, INC.

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Northgate Environmental Management, Inc.
1100 Quail Street Ste. 102
Newport Beach, CA 92660
ATTN: Ms. Cindy Arnold

June 15, 2010

SUBJECT: Tronox LLC Facility, PCS, Henderson, Nevada,
Data Validation

Dear Ms. Arnold,

Enclosed are the final validation reports for the fraction listed below. These SDGs were received on May 27, 2010. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 23265:

SDG #

Fraction

| | |
|---------------------------------|-----------------------|
| G0D080425, G0D130519, G0D150462 | Dioxins/Dibenzofurans |
| G0D150582, G0D150589, G0D160435 | |
| G0D160472, G0D170485, G0D170489 | |
| G0D170491, G0D170492, G0D200427 | |
| G0D200558, G0D240497, G0D270515 | |
| G0D270522, G0D270529, G0D270573 | |
| G0D270574, G0D280571, G0D280586 | |
| G0D300450, G0D300454 | |

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

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

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

Sincerely,

Erlinda T. Rauto
Operations Manager/Senior Chemist

EDD CHECKLIST

LDC #: 23265

SDG #: G0D080425, G0D130519, G0D150462, G0D150582, G0D150589
G0D160435, G0D160472, G0D170485, G0D170489, G0D170491
G0D170492, G0D200427, G0D200558, G0D240497, G0D270515
G0D270522, G0D270529, G0D270573, G0D270574, G0D270574
G0D280571, G0D280586, G0D300450, G0D300454

Tronox Northgate Henderson Worksheet

| EDD Area | Yes | No | NA | Findings/Comments |
|--|-----|----|----|--|
| I. Completeness | | | | |
| Is there an EDD for the associated Tronox validation report? | X | | | |
| II. EDD Qualifier Population | | | | |
| Were all qualifiers from the validation report populated into the EDD? | X | | | |
| III. EDD Lab Anomalies | | | | |
| Were EDD anomalies identified? | | X | | |
| If yes, were they corrected or documented for the client? | | | X | See EDD_discrepancy_form_LDC23265_061510.doc |
| IV. EDD Delivery | | | | |
| Was the final EDD sent to the client? | X | | | |

**Tronox LLC Facility, PCS, Henderson, Nevada
Data Validation Reports
LDC #23265**

Dioxins/Dibenzofurans

LDC

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 6, 2010
LDC Report Date: June 9, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B & 4
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0D080425

Sample Identification

SSA06-02-1BPC
SSA06-02-5BPC
RSAQ3-3BPC**
SA169-3BPC
RSAQ3-3BPC_FD
SSA06-02-1BPC_FD
SSAJ8-01-3BPC**
SSA06-02-5BPCMS
SSA06-02-5BPCMSD

**Indicates sample underwent Stage 4 review

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 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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 of the 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.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

The exact mass of 380.9760 of PFK was verified. The static resolving power was at least 10,000 (10% valley definition) for samples on which Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

The minimum S/N ratio for each target compound was greater than or equal to 2.5 and greater than or equal to 10 for each recovery and internal standard compound for samples on which Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds with the following exceptions:

| Date | Compound | %D | Associated Samples | Affected Compound | Flag | A or P |
|---------|-------------------------------------|------|---|---------------------|------------------|--------|
| 4/22/10 | ¹³ C-1,2,3,4,6,7,8-HpCDD | 30.1 | RSAQ3-3BPC** SA169-3BPC RSAQ3-3BPC_FD SSA06-02-5BPCMSD | 1,2,3,4,6,7,8-HpCDD | J+ (all detects) | P |
| 4/27/10 | 1,2,3,7,8,9-HxCDF | 20.2 | SSAJ8-01-3BPC** | 1,2,3,7,8,9-HxCDF | J+ (all detects) | P |

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|---|---|---|
| 0110455MB | 4/20/10 | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,6,7,8-HpCDF | 0.31 pg/g 0.31 pg/g 0.30 pg/g | SSAJ8-01-3BPC** |
| 0106187MB | 4/16/10 | 2,3,7,8-TCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.036 pg/g 0.14 pg/g 0.45 pg/g 0.088 pg/g 0.040 pg/g 0.062 pg/g 0.054 pg/g 0.076 pg/g 0.15 pg/g | SSA06-02-1BPC SSA06-02-5BPC RSAQ3-3BPC** SA169-3BPC RSAQ3-3BPC_FD SSA06-02-1BPC_FD |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|---------------|---|-------------------------------------|--|
| SSA06-02-1BPC | 2,3,7,8-TCDD 1,2,3,4,6,7,8-HpCDD OCDD | 0.082 pg/g 0.42 pg/g 1.4 pg/g | 0.082U pg/g 0.42U pg/g 1.4U pg/g |

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|------------------|---|--|--|
| SSA06-02-5BPC | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.14 pg/g 0.72 pg/g 0.12 pg/g 0.12 pg/g 0.084 pg/g 0.093 pg/g 0.21 pg/g 0.49 pg/g | 0.14U pg/g 0.72U pg/g 0.12U pg/g 0.12U pg/g 0.084U pg/g 0.093U pg/g 0.21U pg/g 0.49U pg/g |
| RSAQ3-3BPC** | 2,3,7,8-TCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF | 0.038 pg/g 0.23 pg/g 0.61 pg/g 0.24 pg/g 0.12 pg/g 0.13 pg/g 0.20 pg/g | 0.038U pg/g 0.23U pg/g 0.61U pg/g 0.24U pg/g 0.12U pg/g 0.13U pg/g 0.20U pg/g |
| RSAQ3-3BPC_FD | 1,2,3,4,6,7,8-HpCDD OCDD | 0.43 pg/g 1.1 pg/g | 0.43U pg/g 1.1U pg/g |
| SSA06-02-1BPC_FD | 1,2,3,4,6,7,8-HpCDD OCDD | 0.30 pg/g 0.62 pg/g | 0.30U pg/g 0.62U pg/g |

Samples FB-04072010-RZD (from SDG G0D090441), FB04062010-RZB (from SDG G0D120488), and FB-04072010-RZC (from SDG G0D130519) were identified as field blanks. No polychlorinated dioxin/dibenzofuran contaminants were found in these blanks with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---|---|---|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | SSAJ8-01-3BPC** |
| FB04062010-RZB | 4/6/10 | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.68 pg/L 2.5 pg/L 6.2 pg/L 2.7 pg/L 1.4 pg/L 0.82 pg/L 0.94 pg/L 1.8 pg/L 1.2 pg/L 4.4 pg/L | RSAQ3-3BPC** SA169-3BPC RSAQ3-3BPC_FD |

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---------------------|---------------|--------------------|
| FB-04072010-RZC | 4/8/10 | 1,2,3,4,7,8-HxCDD | 0.77 pg/L | SSA06-02-1BPC |
| | | 1,2,3,6,7,8-HxCDD | 0.74 pg/L | SSA06-02-5BPC |
| | | 1,2,3,7,8,9-HxCDD | 0.82 pg/L | SSA06-02-1BPC_FD |
| | | 1,2,3,4,6,7,8-HpCDD | 4.2 pg/L | |
| | | OCDD | 37 pg/L | |
| | | 2,3,7,8-TCDF | 0.57 pg/L | |
| | | 1,2,3,7,8-PeCDF | 0.96 pg/L | |
| | | 2,3,4,7,8-PeCDF | 0.67 pg/L | |
| | | 1,2,3,4,7,8-HxCDF | 1.1 pg/L | |
| | | 1,2,3,6,7,8-HxCDF | 0.96 pg/L | |
| | | 2,3,4,6,7,8-HxCDF | 1.0 pg/L | |
| | | 1,2,3,7,8,9-HxCDF | 1.0 pg/L | |
| | | 1,2,3,4,6,7,8-HpCDF | 2.1 pg/L | |
| | | 1,2,3,4,7,8,9-HpCDF | 1.5 pg/L | |
| | | OCDF | 6.7 pg/L | |

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

VI. Matrix Spike/Matrix Spike Duplicates

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

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits.

X. Target Compound Identifications

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.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|---|--|--|---|---|--------|
| SA169-3BPC | 2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P |
| SSA06-02-1BPC SSA06-02-5BPC RSAQ3-3BPC** RSAQ3-3BPC_FD | 2,3,7,8-TCDF | 2nd column confirmation was not performed for this compound. | This compound must be confirmed on the 2nd column per the method. | None | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D080425 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D080425 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

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

XII. System Performance

The system performance was acceptable for samples on which a Stage 4 review was performed. 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 SSA06-02-1BPC and SSA06-02-1BPC_FD and samples RSAQ3-3BPC** and RSAQ3-3BPC_FD were identified as field duplicates. No polychlorinated dioxins/dibenzofurans were detected in any of the samples with the following exceptions:

| Compound | Concentration (pg/g) | | RPD (Limits) | Difference (Limits) | Flags | A or P |
|---------------------|----------------------|------------------|--------------|----------------------|-------|--------|
| | SSA06-02-1BPC | SSA06-02-1BPC_FD | | | | |
| 2,3,7,8-TCDD | 0.082 | 1.0U | - | 0.918 (≤ 1.0) | - | - |
| 1,2,3,7,8-PeCDD | 0.19 | 0.082 | - | 0.108 (≤ 5.2) | - | - |
| 1,2,3,4,7,8-HxCDD | 0.13 | 5.2U | - | 5.07 (≤ 5.2) | - | - |
| 1,2,3,6,7,8-HxCDD | 0.17 | 0.14 | - | 0.03 (≤ 5.2) | - | - |
| 1,2,3,7,8,9-HxCDD | 0.19 | 0.11 | - | 0.08 (≤ 5.2) | - | - |
| 1,2,3,4,6,7,8-HpCDD | 0.42 | 0.30 | - | 0.12 (≤ 5.2) | - | - |
| OCDD | 1.4 | 0.62 | - | 0.78 (≤ 10) | - | - |
| 2,3,7,8-TCDF | 0.91 | 0.76 | - | 0.15 (≤ 1.0) | - | - |
| 1,2,3,7,8-PeCDF | 0.62 | 1.0 | - | 0.38 (≤ 5.2) | - | - |
| 2,3,4,7,8-PeCDF | 0.39 | 0.47 | - | 0.08 (≤ 5.2) | - | - |
| 1,2,3,4,7,8-HxCDF | 0.92 | 1.6 | - | 0.68 (≤ 5.2) | - | - |
| 1,2,3,6,7,8-HxCDF | 0.49 | 0.85 | - | 0.36 (≤ 5.2) | - | - |
| 2,3,4,6,7,8-HxCDF | 0.16 | 0.27 | - | 0.11 (≤ 5.2) | - | - |
| 1,2,3,7,8,9-HxCDF | 0.19 | 0.16 | - | 0.03 (≤ 5.2) | - | - |
| 1,2,3,4,6,7,8-HpCDF | 1.2 | 2.0 | - | 0.8 (≤ 5.2) | - | - |
| 1,2,3,4,7,8,9-HpCDF | 0.83 | 1.1 | - | 0.27 (≤ 5.2) | - | - |
| OCDF | 2.8 | 4.4 | - | 1.6 (≤ 10) | - | - |

| Compound | Concentration (pg/g) | | RPD (Limits) | Difference (Limits) | Flags | A or P |
|--------------|----------------------|---------------|--------------|----------------------|-------|--------|
| | RSAQ3-3BPC** | RSAQ3-3BPC_FD | | | | |
| 2,3,7,8-TCDD | 0.038 | 1.0U | - | 0.962 (≤ 1.0) | - | - |

| Compound | Concentration (pg/g) | | RPD (Limits) | Difference (Limits) | Flags | A or P |
|---------------------|----------------------|---------------|--------------|----------------------|-------|--------|
| | RSAQ3-3BPC** | RSAQ3-3BPC_FD | | | | |
| 1,2,3,4,7,8-HxCDD | 0.066 | 5.2U | - | 5.134 (≤ 5.2) | - | - |
| 1,2,3,6,7,8-HxCDD | 0.079 | 0.10 | - | 0.021 (≤ 5.2) | - | - |
| 1,2,3,7,8,9-HxCDD | 0.15 | 0.20 | - | 0.05 (≤ 5.2) | - | - |
| 1,2,3,4,6,7,8-HpCDD | 0.23 | 0.43 | - | 0.2 (≤ 5.2) | - | - |
| OCDD | 0.61 | 1.1 | - | 0.49 (≤ 10) | - | - |
| 2,3,7,8-TCDF | 0.24 | 0.64 | - | 0.4 (≤ 1.0) | - | - |
| 1,2,3,7,8-PeCDF | 0.12 | 5.2U | - | 5.08 (≤ 5.2) | - | - |
| 2,3,4,7,8-PeCDF | 0.13 | 5.2U | - | 5.07 (≤ 5.2) | - | - |
| 1,2,3,4,7,8-HxCDF | 0.20 | 0.79 | - | 0.59 (≤ 5.2) | - | - |
| 1,2,3,6,7,8-HxCDF | 0.11 | 0.38 | - | 0.27 (≤ 5.2) | - | - |
| 2,3,4,6,7,8-HxCDF | 0.091 | 5.2U | - | 5.109 (≤ 5.2) | - | - |
| 1,2,3,7,8,9-HxCDF | 0.12 | 0.33 | - | 0.21 (≤ 5.2) | - | - |
| 1,2,3,4,6,7,8-HpCDF | 0.39 | 1.2 | - | 0.81 (≤ 5.2) | - | - |
| 1,2,3,4,7,8,9-HpCDF | 0.20 | 0.63 | - | 0.43 (≤ 5.2) | - | - |
| OCDF | 0.92 | 2.8 | - | 1.88 (≤ 10) | - | - |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D080425**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|--|--|--|--------|------------------------------------|
| G0D080425 | RSAQ3-3BPC** SA169-3BPC RSAQ3-3BPC_FD | 1,2,3,4,6,7,8-HpCDD | J+ (all detects) | P | Routine calibration (%D) (c) |
| G0D080425 | SSAJ8-01-3BPC** | 1,2,3,7,8,9-HxCDF | J+ (all detects) | P | Routine calibration (%D) (c) |
| G0D080425 | SA169-3BPC | 2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D080425 | SSA06-02-1BPC SSA06-02-5BPC RSAQ3-3BPC** RSAQ3-3BPC_FD | 2,3,7,8-TCDF | None | P | Project Quantitation Limit (o) |
| G0D080425 | SSA06-02-1BPC SSA06-02-5BPC RSAQ3-3BPC** SA169-3BPC RSAQ3-3BPC_FD SSA06-02-1BPC_FD SSAJ8-01-3BPC** | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D080425 | SSA06-02-1BPC SSA06-02-5BPC RSAQ3-3BPC** SA169-3BPC RSAQ3-3BPC_FD SSA06-02-1BPC_FD SSAJ8-01-3BPC** | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D080425**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|---------------|---|--|--------|------|
| G0D080425 | SSA06-02-1BPC | 2,3,7,8-TCDD 1,2,3,4,6,7,8-HpCDD OCDD | 0.082U pg/g 0.42U pg/g 1.4U pg/g | A | bl |

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|------------------|---|--|--------|------|
| G0D080425 | SSA06-02-5BPC | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.14U pg/g 0.72U pg/g 0.12U pg/g 0.12U pg/g 0.084U pg/g 0.093U pg/g 0.21U pg/g 0.49U pg/g | A | bl |
| G0D080425 | RSAQ3-3BPC** | 2,3,7,8-TCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF | 0.038U pg/g 0.23U pg/g 0.61U pg/g 0.24U pg/g 0.12U pg/g 0.13U pg/g 0.20U pg/g | A | bl |
| G0D080425 | RSAQ3-3BPC_FD | 1,2,3,4,6,7,8-HpCDD OCDD | 0.43U pg/g 1.1U pg/g | A | bl |
| G0D080425 | SSAO6-02-1BPC_FD | 1,2,3,4,6,7,8-HpCDD OCDD | 0.30U pg/g 0.62U pg/g | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D080425**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B/4

LDC #: 23265A21

SDG #: GOD080425

Laboratory: Test America

Date: 4/8/10

Page: 1 of 1

Reviewer: [Signature]

2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/6/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ICV | SW | |
| V. | Blanks | SW | |
| VI. | Matrix spike/Matrix spike duplicates | SW | |
| VII. | Laboratory control samples | A | LOS |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | SW | |
| X. | Target compound identifications | A | |
| XI. | Compound quantitation and CRQLs | SW | |
| XII. | System performance | A | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | SW | D = 1 + 6 . 3 + 5 |
| XV. | Field blanks | SW | FB-0407210-RZD (GOD090441)FB04062010-RZB (GOD120488) FB-04072010-RZC (GOD130519) |

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: ** level IV

| | | | | | | | |
|----|------------------|---|----|-----------|----|--|----|
| 1 | SSA06-02-1BPC | c | 11 | 0106187MB | 21 | | 31 |
| 2 | SSA06-02-5BPC | c | 12 | 0110455MB | 22 | | 32 |
| 3 | RSAQ3-3BPC ** | B | 13 | | 23 | | 33 |
| 4 | SA169-3BPC | | 14 | | 24 | | 34 |
| 5 | RSAQ3-3BPC_FD | | 15 | | 25 | | 35 |
| 6 | SSA06-02-1BPC_FD | c | 16 | | 26 | | 36 |
| 7 | SSAJ8-01-3BPC ** | D | 17 | | 27 | | 37 |
| 8 | SSA06-02-5BPCMS | | 18 | | 28 | | 38 |
| 9 | SSA06-02-5BPCMSD | | 19 | | 29 | | 39 |
| 10 | | | 20 | | 30 | | 40 |

Notes: _____

LDC #: 03265A21
 SDG #: see count

VALIDATION FINDINGS CHECKLIST

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

Method: Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| Validation Area | Yes | No | NA | Findings/Comments |
|--|-------------------------------------|--------------------------|--------------------------|-------------------|
| I. Technical holding times | | | | |
| All technical holding times were met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Cooler temperature criteria was met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| II. GC/MS Instrument performance check | | | | |
| Was PFK exact mass 380.9760 verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the retention time windows established for all homologues? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomers $\leq 25\%$? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the static resolving power at least 10,000 (10% valley definition)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the mass resolution adequately check with PFK? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the presence of 1,2,8,9-TCDD and 1,3,4,6,8-PeCDF verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| III. Initial calibration | | | | |
| Was the initial calibration performed at 5 concentration levels? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent relative standard deviations (%RSD) $\leq 20\%$ for unlabeled standards and $\leq 30\%$ for labeled standards? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Did all calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the signal to noise ratio for each target compound ≥ 2.5 and for each recovery and internal standard ≥ 10 ? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| IV. Continuing calibration | | | | |
| Was a routine calibration performed at the beginning and end of each 12 hour period? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent differences (%D) $\leq 20\%$ for unlabeled standards and $\leq 30\%$ for labeled standards? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Did all routine calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| V. Blanks | | | | |
| Was a method blank associated with every sample in this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was a method blank performed for each matrix and concentration? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| VI. 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| VII. Laboratory control samples | | | | |
| Was an LCS analyzed for this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was an LCS analyzed per extraction batch? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

VALIDATION FINDINGS CHECKLIST

| | | | | |
|---|--|-------------------------------------|-------------------------------------|--|
| VIII. Regional Quality Assurance and Quality Control | | | | |
| Were performance evaluation (PE) samples performed? | | | <input checked="" type="checkbox"/> | |
| Were the performance evaluation (PE) samples within the acceptance limits? | | | <input checked="" type="checkbox"/> | |
| IX. Internal standards | | | | |
| Were internal standard recoveries within the 40-135% criteria? | | | <input checked="" type="checkbox"/> | |
| Was the minimum S/N ratio of all internal standard peaks > 10? | | <input checked="" type="checkbox"/> | | |
| X. Target compound identification | | | | |
| For 2,3,7,8 substituted congeners with associated labeled standards, were the retention times of the two quantitation peaks within -1 to 3 sec. of the RT of the labeled standard? | | <input checked="" type="checkbox"/> | | |
| For 2,3,7,8 substituted congeners without associated labeled standards, were the relative retention times of the two quantitation peaks within 0.005 time units of the RRT measured in the routine calibration? | | <input checked="" type="checkbox"/> | | |
| For non-2,3,7,8 substituted congeners, were the retention times of the two quantitation peaks within RT established in the performance check solution? | | <input checked="" type="checkbox"/> | | |
| Did compound spectra contain all characteristic ions listed in the table attached? | | <input checked="" type="checkbox"/> | | |
| Was the Ion Abundance Ratio for the two quantitation ions within criteria? | | <input checked="" type="checkbox"/> | | |
| Was the signal to noise ratio for each target compound and labeled standard > 2.5? | | <input checked="" type="checkbox"/> | | |
| Does the maximum intensity of each specified characteristic ion coincide within ± 2 seconds (includes labeled standards)? | | <input checked="" type="checkbox"/> | | |
| For PCDF identification, was any signal (S/N ≥ 2.5, at ± seconds RT) detected in the corresponding PCDPE channel? | | | <input checked="" type="checkbox"/> | |
| Was an acceptable lock mass recorded and monitored? | | <input checked="" type="checkbox"/> | | |
| XI. Compound quantitation/CRQLs | | | | |
| Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound? | | <input checked="" type="checkbox"/> | | |
| Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation? | | <input checked="" type="checkbox"/> | | |
| XII. System performance | | | | |
| System performance was found to be acceptable. | | <input checked="" type="checkbox"/> | | |
| XIII. Overall assessment of data | | | | |
| Overall assessment of data was found to be acceptable. | | <input checked="" type="checkbox"/> | | |
| XIV. Field duplicates | | | | |
| Field duplicate pairs were identified in this SDG. | | <input checked="" type="checkbox"/> | | |
| Target compounds were detected in the field duplicates. | | <input checked="" type="checkbox"/> | | |
| XV. Field blanks | | | | |
| Field blanks were identified in this SDG. | | <input checked="" type="checkbox"/> | | |
| Target compounds were detected in the field blanks. | | <input checked="" type="checkbox"/> | | |

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

LDC #: 23265A21

SDG #: See Cover

VALIDATION FINDINGS WORKSHEET Field Blanks

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

Y N N/A Were field blanks identified in this SDG?

Blank units: pg/L Associated sample units: pg/g

Sampling date: 4/8/10

Field blank type: (circle one) Field Blank / Rinsate / Other: 1-2, 6 Associated Samples: 1-2, 6

| Compound | Blank ID | 5X | Sample Identification |
|----------|-----------------|---------|-----------------------|
| | EB-04072010-RZC | | |
| C | 0.77 | 0.00385 | |
| D | 0.74 | 0.0037 | |
| E | 0.82 | 0.0041 | |
| F | 4.2 | 0.021 | |
| G | 37 | 0.185 | |
| H | 0.57 | 0.00285 | |
| I | 0.96 | 0.0048 | |
| J | 0.67 | 0.00335 | |
| K | 1.1 | 0.0055 | |
| L | 0.96 | 0.0048 | |
| M | 1.0 | 0.005 | |
| N | 1.0 | 0.005 | |
| O | 2.1 | 0.0105 | |
| P | 1.5 | 0.0075 | |
| Q | 6.7 | 0.0335 | |
| 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#: 23265A21
 SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y N NA
Y N NA

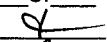
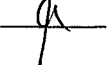
Were field duplicate pairs identified in this SDG?
 Were target analytes detected in the field duplicate pairs?

| Compound | Concentration (pg/g) | | (≤50) | (pg/g) | (pg/g) | Qualifications (Parent Only) |
|----------|----------------------|-------|-------|------------|--------|---------------------------------|
| | 1 | 6 | RPD | Difference | Limits | |
| A | 0.082 | 1.0U | | 0.918 | (≤1.0) | |
| B | 0.19 | 0.082 | | 0.108 | (≤5.2) | |
| C | 0.13 | 5.2U | | 5.07 | (≤5.2) | |
| D | 0.17 | 0.14 | | 0.03 | (≤5.2) | |
| E | 0.19 | 0.11 | | 0.08 | (≤5.2) | |
| F | 0.42 | 0.30 | | 0.12 | (≤5.2) | |
| G | 1.4 | 0.62 | | 0.78 | (≤10) | |
| H | 0.91 | 0.76 | | 0.15 | (≤1.0) | |
| I | 0.62 | 1.0 | | 0.38 | (≤5.2) | |
| J | 0.39 | 0.47 | | 0.08 | (≤5.2) | |
| K | 0.92 | 1.6 | | 0.68 | (≤5.2) | |
| L | 0.49 | 0.85 | | 0.36 | (≤5.2) | |
| M | 0.16 | 0.27 | | 0.11 | (≤5.2) | |
| N | 0.19 | 0.16 | | 0.03 | (≤5.2) | |
| O | 1.2 | 2.0 | | 0.8 | (≤5.2) | |
| P | 0.83 | 1.1 | | 0.27 | (≤5.2) | |
| Q | 2.8 | 4.4 | | 1.6 | (≤10) | |

| Compound | Concentration (pg/g) | | (≤50) | (pg/g) | (pg/g) | Qualifications (Parent Only) |
|----------|----------------------|------|-------|------------|--------|---------------------------------|
| | 3 | 5 | RPD | Difference | Limits | |
| A | 0.038 | 1.0U | | 0.962 | (≤1.0) | |
| C | 0.066 | 5.2U | | 5.134 | (≤5.2) | |
| D | 0.079 | 0.10 | | 0.021 | (≤5.2) | |
| E | 0.15 | 0.20 | | 0.05 | (≤5.2) | |
| F | 0.23 | 0.43 | | 0.2 | (≤5.2) | |
| G | 0.61 | 1.1 | | 0.49 | (≤10) | |
| H | 0.24 | 0.64 | | 0.4 | (≤1.0) | |

LDC#: 23265A21
SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Page: 2 of 2
Reviewer: 
2nd Reviewer: 

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

| Compound | Concentration (pg/g) | | (≤50) | (pg/g) | (pg/g) | Qualifications (Parent Only) |
|----------|----------------------|------|-------|------------|--------|---------------------------------|
| | 3 | 5 | RPD | Difference | Limits | |
| I | 0.12 | 5.2U | | 5.08 | (≤5.2) | |
| J | 0.13 | 5.2U | | 5.07 | (≤5.2) | |
| K | 0.20 | 0.79 | | 0.59 | (≤5.2) | |
| L | 0.11 | 0.38 | | 0.27 | (≤5.2) | |
| M | 0.091 | 5.2U | | 5.109 | (≤5.2) | |
| N | 0.12 | 0.33 | | 0.21 | (≤5.2) | |
| O | 0.39 | 1.2 | | 0.81 | (≤5.2) | |
| P | 0.20 | 0.63 | | 0.43 | (≤5.2) | |
| Q | 0.92 | 2.8 | | 1.88 | (≤10) | |

V:\FIELD DUPLICATES\23265A21.wpd

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

$RRF = (A_x)(C_s)/(A_s)(C_x)$
 average RRF = sum of the RRFs/number of standards
 $\%RSD = 100 * (S/X)$
 A_x = Area of compound,
 C_x = Concentration of compound,
 S = Standard deviation of the RRFs,
 A_s = Area of associated internal standard
 C_s = Concentration of internal standard
 X = Mean of the RRFs

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Reported | | Recalculated | | Reported | | Recalculated | |
|---|---------------|------------------|--|-----------------------|---------------|-----------------------|---------------|----------|------|---------------|------|
| | | | | Average RRF (Initial) | RRF (Initial) | Average RRF (Initial) | RRF (CS3 std) | %RSD | %RSD | RRF (CS3 std) | %RSD |
| 1 | 1042 (105) | 1/10/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.860 | 0.87 | 0.860 | 0.87 | 10.4 | 10.4 | 0.87 | 10.6 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 0.934 | 0.95 | 0.934 | 0.95 | 10.9 | 10.9 | 0.95 | 12.8 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.058 | 1.09 | 1.058 | 1.09 | 11.2 | 11.2 | 1.09 | 11.0 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.998 | 1.05 | 0.998 | 1.05 | 12.2 | 12.2 | 1.05 | 12.2 |
| | | | OCDF (¹³ C-OCDD) | 1.437 | 1.52 | 1.437 | 1.52 | 14.1 | 14.1 | 1.52 | 14.0 |
| 2 | 1042 | 4/21/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 1.10 | 1.088 | 1.10 | 10.9 | 10.9 | 1.10 | 12.0 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | | | | |
| 3 | 1042 (405) | 4/12/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.945 | 0.98 | 0.945 | 0.98 | 4.4 | 4.4 | 0.98 | 4.33 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.021 | 1.04 | 1.021 | 1.04 | 8.03 | 8.03 | 1.04 | 8.97 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.114 | 1.19 | 1.114 | 1.19 | 5.33 | 5.33 | 1.19 | 5.25 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.072 | 1.11 | 1.072 | 1.11 | 3.60 | 3.60 | 1.11 | 3.75 |
| | | | OCDF (¹³ C-OCDD) | 1.445 | 1.51 | 1.445 | 1.51 | 5.85 | 5.85 | 1.51 | 5.89 |

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.

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Difference = $100 * (\text{ave. RRF} - \text{RRF}) / \text{ave. RRF}$ Where: ave. RRF = initial calibration average RRF
 RRF = $(A_x)(C_s) / (A_s)(C_x)$ RRF = continuing calibration RRF
 A_x = Area of compound, A_s = Area of associated internal standard
 C_x = Concentration of compound, C_s = Concentration of internal standard

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Average RRF (Initial) | Reported | | Recalculated | |
|---|-------------|------------------|--|-----------------------|----------|------|--------------|------|
| | | | | | RRF (CC) | %D | RRF (CC) | %D |
| 1 | 21A7104DS | 4/21/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.945 | 1.04 | 9.6 | 1.04 | 9.6 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.021 | 1.03 | 1.2 | 1.03 | 1.2 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.114 | 1.26 | 13.5 | 1.26 | 13.5 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.072 | 1.09 | 3.0 | 1.09 | 3.0 |
| | | | OCDF (¹³ C-OCDD) | 1.445 | 1.50 | 3.9 | 1.50 | 3.9 |
| 2 | 21A7104BS | 4/22/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.945 | 1.03 | 8.7 | 1.03 | 8.7 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.021 | 0.97 | 5.3 | 0.97 | 5.3 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.114 | 1.13 | 1.6 | 1.13 | 1.6 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.072 | 1.03 | 3.5 | 1.03 | 3.5 |
| | | | OCDF (¹³ C-OCDD) | 1.445 | 1.42 | 1.7 | 1.42 | 1.7 |
| 3 | 21A7104DS | 4/28/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.945 | 0.97 | 2.8 | 0.97 | 2.8 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.021 | 0.95 | 6.6 | 0.95 | 6.6 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.114 | 1.09 | 2.4 | 1.09 | 2.4 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.072 | 1.03 | 4.0 | 1.03 | 4.0 |
| | | | OCDF (¹³ C-OCDD) | 1.445 | 1.34 | 6.9 | 1.34 | 6.9 |

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

VALIDATION FINDINGS WORKSHEET I
 Routine Calibration Results Verification

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

SDG #: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Difference = $100 * (\text{ave. RRF} - \text{RRF}) / \text{ave. RRF}$ Where: ave. RRF = initial calibration average RRF
 RRF = $(A_x)(C_s) / (A_s)(C_x)$ RRF = continuing calibration RRF
 A_x = Area of compound, A_s = Area of associated internal standard
 C_x = Concentration of compound, C_s = Concentration of internal standard

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Average RRF (Initial) | Reported | | Recalculated | |
|---|-------------|------------------|--|-----------------------|----------|-----|--------------|-----|
| | | | | | RRF (CC) | %D | RRF (CC) | %D |
| 1 | 2AP10A115 | 4/26/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.860 | 0.92 | 7.0 | 0.92 | 7.0 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 0.934 | 0.93 | 0.1 | 0.93 | 0.1 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.058 | 1.15 | 8.9 | 1.15 | 8.9 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.998 | 1.06 | 6.2 | 1.06 | 6.2 |
| | | | OCDF (¹³ C-OCDD) | 1.437 | 1.54 | 7.2 | 1.54 | 7.2 |
| 2 | 2AP10A112 | 4/27/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 1.04 | 4.5 | 1.04 | 4.5 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | |
| 3 | | | OCDF (¹³ C-OCDD) | | | | | |
| | | | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | | | | | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | |

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

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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 = $100 * (SSR - SR) / SA$ Where: SSR = Spiked sample result, SR = Sample result
 SA = Spike added

RPD = $|MSR - MSDR| * 2 / (MSR + MSDR)$ MSR = Matrix spike percent recovery MSDR = Matrix spike duplicate percent recovery

MS/MSD samples: 8/9

| Compound | Spike Added (pg) | | Sample Concentration (pg/g) | Spiked Sample Concentration (pg/g) | | Matrix Spike Percent Recovery | | Matrix Spike Duplicate Percent Recovery | | Reported RPD | Recalculated RPD |
|---------------------|------------------|------|-----------------------------|------------------------------------|------|-------------------------------|---------|---|---------|--------------|------------------|
| | MS | MSD | | MS | MSD | Reported | Recalc. | Reported | Recalc. | Reported | Recalculated |
| 2,3,7,8-TCDD | 21.9 | 21.9 | ND | 1.5 | 20.6 | 98 | 98 | 94 | 94 | 4.0 | 4.3 |
| 1,2,3,7,8-PeCDD | 11.0 | 11.0 | ↓ | 10.4 | 10.9 | 95 | 95 | 99 | 99 | 4.7 | 4.7 |
| 1,2,3,4,7,8-HxCDD | ↓ | ↓ | ↓ | 10.2 | 13.1 | 93 | 93 | 119 | 119 | 2.7 | 2.5 |
| 1,2,3,4,7,8,9-HpCDF | ↓ | ↓ | ↓ | 13.2 | 18.7 | 120 | 120 | 171 | 170 | 3.5 | 3.4 |
| OCDF | 21.9 | 21.9 | 0.49 | 26.8 | 40.0 | 122 | 122 | 182 | 182 | 3.9 | 3.9 |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
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| | | | | | | | | | | | |

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

VALIDATION FINDINGS WORKSHEET
Laboratory Control Sample Results Verification

METHOD: GC/MS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Recovery = $100 * SSC/SA$ Where: SSC = Spiked sample concentration
 SA = Spike added

RPD = $|(LCS - LCSD) / ((LCS + LCSD) / 2)|$

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

LCS ID: 0106187

| Compound | Spike Added | | Spiked Sample Concentration | | LCS | | LCSD | | Percent Recovery | | Percent Recovery | | RPD | |
|---------------------|-------------|------|-----------------------------|------|----------|---------|----------|---------|------------------|---------|------------------|---------|----------|---------|
| | LCS | LCSD | LCS | LCSD | Reported | Recalc. | Reported | Recalc. | Reported | Recalc. | Reported | Recalc. | Reported | Recalc. |
| | | | | | | | | | | | | | | |
| 2,3,7,8-TCDD | 20.0 | NA | 20.2 | NA | 101 | 101 | | | | | | | | |
| 1,2,3,7,8-PeCDD | 100 | | 103 | | 103 | 103 | | | | | | | | |
| 1,2,3,4,7,8-HxCDD | | | 96.0 | | 96 | 96 | | | | | | | | |
| 1,2,3,4,7,8,9-HpCDF | | | 110 | | 110 | 110 | | | | | | | | |
| OCDF | 200 | | 204 | | 102 | 102 | | | | | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
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| | | | | | | | | | | | | | | |

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

| Descriptor | Accurate mass ^(a) | Ion ID | Elemental Composition | Analyte | Descriptor | Accurate Mass ^(a) | Ion ID | Elemental Composition | Analyte | | | |
|------------|------------------------------|----------|---|--|------------|------------------------------|------------|---|--|---|---|------|
| 1 | 303.9016 | M | C ₁₂ H ₃₅ Cl ₄ O | TCDF | 4 | 407.7818 | M+2 | C ₁₂ H ₃₅ Cl ₃ ³⁷ ClO | HpCDF | | | |
| | 305.8987 | M+2 | C ₁₂ H ₃₅ Cl ₃ ³⁷ Cl ₂ O | TCDF | | M+4 | 409.7788 | M+4 | C ₁₂ H ₃₅ Cl ₂ ³⁷ Cl ₂ O | HpCDF | | |
| | 315.9419 | M | ¹³ C ₁₂ H ₃₅ Cl ₄ O | TCDF (S) | | M | 419.8250 | M | ¹³ C ₁₂ H ₃₅ Cl ₃ O | HpCDF (S) | | |
| | 317.9389 | M+2 | ¹³ C ₁₂ H ₃₅ Cl ₃ ³⁷ ClO | TCDF (S) | | M+2 | 419.8220 | M+2 | ¹³ C ₁₂ H ₃₅ Cl ₂ ³⁷ ClO | HpCDF | | |
| | 319.8965 | M | C ₁₂ H ₃₅ Cl ₄ O ₂ | TCDD | | M+2 | 423.7767 | M+2 | C ₁₂ H ₃₅ Cl ₃ ³⁷ ClO ₂ | HpCDD | | |
| | 321.8936 | M+2 | C ₁₂ H ₃₅ Cl ₃ ³⁷ Cl ₂ O | TCDD | | M+4 | 425.7737 | M+4 | C ₁₂ H ₃₅ Cl ₂ ³⁷ Cl ₂ O ₂ | HpCDD | | |
| | 331.9368 | M | ¹³ C ₁₂ H ₃₅ Cl ₃ ³⁷ Cl ₂ O | TCDD (S) | | M+2 | 435.8169 | M+2 | ¹³ C ₁₂ H ₃₅ Cl ₂ ³⁷ Cl ₂ O ₂ | HpCDD (S) | | |
| | 333.9338 | M+2 | ¹³ C ₁₂ H ₃₅ Cl ₂ ³⁷ Cl ₂ O | TCDD (S) | | M+4 | 437.8140 | M+4 | ¹³ C ₁₂ H ₃₅ Cl ₃ ³⁷ Cl ₂ O ₂ | HpCDD (S) | | |
| | 375.8364 | M+2 | C ₁₂ H ₃₅ Cl ₅ ³⁷ ClO | HxCDFE | | M+4 | 479.7165 | M+4 | C ₁₂ H ₃₅ Cl ₄ ³⁷ Cl ₂ O | NCDPE | | |
| | [354.9792] | LOCK | C ₉ F ₁₃ | PFK | | LOCK | [430.9728] | LOCK | C ₉ F ₁₇ | PFK | | |
| | 2 | 339.8597 | M+2 | C ₁₂ H ₃₅ Cl ₄ ³⁷ ClO | | PeCDF | 5 | 441.7428 | M+2 | C ₁₂ Cl ₃ ³⁷ ClO | OCDF | |
| | | 341.8567 | M+4 | C ₁₂ H ₃₅ Cl ₃ ³⁷ Cl ₂ O | | PeCDF | | M+4 | 443.7399 | M+4 | C ₁₂ Cl ₂ ³⁷ Cl ₂ O | OCDF |
| | | 351.9000 | M+2 | ¹³ C ₁₂ H ₃₅ Cl ₃ ³⁷ ClO | | PeCDF (S) | | M+2 | 457.7377 | M+2 | C ₁₂ Cl ₃ ³⁷ ClO ₂ | OCDD |
| 353.8970 | | M+4 | ¹³ C ₁₂ H ₃₅ Cl ₂ ³⁷ Cl ₂ O | PeCDF (S) | M+4 | 459.7348 | | M+4 | C ₁₂ Cl ₂ ³⁷ Cl ₂ O ₂ | OCDD | | |
| 355.8546 | | M+2 | C ₁₂ H ₃₅ Cl ₄ ³⁷ ClO ₂ | PeCDD | M+2 | 469.7780 | | M+2 | ¹³ C ₁₂ Cl ₃ ³⁷ ClO ₂ | OCDD (S) | | |
| 357.8516 | | M+4 | C ₁₂ H ₃₅ Cl ₃ ³⁷ Cl ₂ O ₂ | PeCDD | M+4 | 471.7750 | | M+4 | ¹³ C ₁₂ Cl ₂ ³⁷ Cl ₂ O ₂ | OCDD (S) | | |
| 367.8949 | | M+2 | ¹³ C ₁₂ H ₃₅ Cl ₂ ³⁷ Cl ₂ O ₂ | PeCDD (S) | M+2 | 513.6775 | | M+2 | C ₁₂ Cl ₃ ³⁷ Cl ₂ O | DCDPE | | |
| 369.8919 | | M+4 | ¹³ C ₁₂ H ₃₅ Cl ₃ ³⁷ Cl ₂ O ₂ | PeCDD (S) | M+4 | [422.9278] | | M+4 | C ₁₂ Cl ₂ ³⁷ Cl ₂ O | PFK | | |
| 409.7974 | | M+2 | C ₁₂ H ₃₅ Cl ₅ ³⁷ ClO | HpCDFE | LOCK | | | LOCK | C ₁₀ F ₁₇ | | | |
| [354.9792] | | LOCK | C ₉ F ₁₃ | PFK | | | | | | | | |
| 3 | | 373.8208 | M+2 | C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO | HxCDF | | | | | | | |
| | | 375.8178 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ Cl ₂ O | HxCDF | | | | | | | |
| | | 383.8639 | M | ¹³ C ₁₂ H ₂ ³⁵ Cl ₅ O | HxCDF (S) | | | | | | | |
| | 385.8610 | M+2 | ¹³ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ ClO | HxCDF (S) | | | | | | | | |
| | 389.8156 | M+2 | C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO ₂ | HxCDD | | | | | | | | |
| | 391.8127 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ Cl ₂ O ₂ | HxCDD | | | | | | | | |
| | 401.8559 | M+2 | ¹³ C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO ₂ | HxCDD (S) | | | | | | | | |
| | 403.8529 | M+4 | ¹³ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ Cl ₂ O ₂ | HxCDD (S) | | | | | | | | |
| | 445.7555 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₆ ³⁷ Cl ₂ O | OCDFE | | | | | | | | |
| | [430.9728] | LOCK | C ₉ F ₁₇ | PFK | | | | | | | | |

(a) The following nuclidic masses were used:

H = 1.007825
 C = 12.000000
¹³C = 13.003355
 F = 18.9984
 O = 15.994915
³⁵Cl = 34.968853
³⁷Cl = 36.966903

S = internal/recovery standard

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 8, 2010
LDC Report Date: June 9, 2010
Matrix: Water
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): GOD130519

Sample Identification

FB-04072010-RZC
EB-04072010-RZC

Introduction

This data review covers 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|--|------------------------------|
| 0123308MB | 4/19/10 | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF | 0.88 pg/L 1.6 pg/L 2.6 pg/L 0.94 pg/L 0.89 pg/L 0.50 pg/L 1.1 pg/L 0.93 pg/L 0.98 pg/L | All samples in SDG G0D130519 |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|-----------------|--|---|---|
| FB-04072010-RZC | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF | 0.82 pg/L 4.2 pg/L 0.67 pg/L 1.1 pg/L 0.96 pg/L 1.0 pg/L 2.1 pg/L 1.5 pg/L | 0.82U pg/L 4.2U pg/L 0.67U pg/L 1.1U pg/L 0.96U pg/L 1.0U pg/L 2.1U pg/L 1.5U pg/L |
| EB-04072010-RZC | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF | 0.65 pg/L 5.5 pg/L 1.0 pg/L 1.8 pg/L 1.1 pg/L 0.97 pg/L 4.5 pg/L 1.1 pg/L | 0.65U pg/L 5.5U pg/L 1.0U pg/L 1.8U pg/L 1.1U pg/L 0.97U pg/L 4.5U pg/L 1.1U pg/L |

Sample EB-04072010-RZC was identified as an equipment blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|--------------------|---------------|--|---|-----------------------------------|
| EB-04072010-RZC | 4/8/10 | 2,3,7,8-TCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 1.0 pg/L 0.69 pg/L 0.65 pg/L 5.5 pg/L 53 pg/L 2.6 pg/L 1.5 pg/L 1.0 pg/L 1.8 pg/L 1.1 pg/L 0.97 pg/L 4.5 pg/L 1.1 pg/L 12 pg/L | No associated samples in this SDG |

Sample FB-04072010-RZC was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---------------------|---------------|-----------------------------------|
| FB-04072010-RZC | 4/8/10 | 1,2,3,4,7,8-HxCDD | 0.77 pg/L | No associated samples in this SDG |
| | | 1,2,3,6,7,8-HxCDD | 0.74 pg/L | |
| | | 1,2,3,7,8,9-HxCDD | 0.82 pg/L | |
| | | 1,2,3,4,6,7,8-HpCDD | 4.2 pg/L | |
| | | OCDD | 37 pg/L | |
| | | 2,3,7,8-TCDF | 0.57 pg/L | |
| | | 1,2,3,7,8-PeCDF | 0.96 pg/L | |
| | | 2,3,4,7,8-PeCDF | 0.67 pg/L | |
| | | 1,2,3,4,7,8-HxCDF | 1.1 pg/L | |
| | | 1,2,3,6,7,8-HxCDF | 0.96 pg/L | |
| | | 2,3,4,6,7,8-HxCDF | 1.0 pg/L | |
| | | 1,2,3,7,8,9-HxCDF | 1.0 pg/L | |
| | | 1,2,3,4,6,7,8-HpCDF | 2.1 pg/L | |
| | | 1,2,3,4,7,8,9-HpCDF | 1.5 pg/L | |
| | | OCDF | 6.7 pg/L | |

VI. 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.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits.

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|------------------------------|--------------|--|---|------|--------|
| All samples in SDG G0D130519 | 2,3,7,8-TCDF | 2nd column confirmation was not performed for this compound. | This compound must be confirmed on the 2nd column per the method. | None | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D130519 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D130519 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D130519**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|------------------------------------|---------------------------------------|------------------|--------|---------------------------------|
| G0D130519 | FB-04072010-RZC EB-04072010-RZC | 2,3,7,8-TCDF | None | P | Project Quantitation Limit (o) |
| G0D130519 | FB-04072010-RZC EB-04072010-RZC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D130519 | FB-04072010-RZC EB-04072010-RZC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0D130519**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|-----------------|--|---|--------|------|
| G0D130519 | FB-04072010-RZC | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF | 0.82U pg/L 4.2U pg/L 0.67U pg/L 1.1U pg/L 0.96U pg/L 1.0U pg/L 2.1U pg/L 1.5U pg/L | A | bl |
| G0D130519 | EB-04072010-RZC | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF | 0.65U pg/L 5.5U pg/L 1.0U pg/L 1.8U pg/L 1.1U pg/L 0.97U pg/L 4.5U pg/L 1.1U pg/L | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG G0D130519**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D130519**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265C21
 SDG #: G0D130519
 Laboratory: Test America

Date: 4/8/10
 Page: 11 of 17
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/8/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ISV | A | |
| V. | Blanks | W | |
| VI. | Matrix spike/Matrix spike duplicates | N | diat spiked |
| VII. | Laboratory control samples | A | ICS |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | A | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | SW | All EMPC - JK(E) |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | W | FB = 1. EB = 2 |

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

Validated Samples:

| | | | | | | | |
|----|--------------------------|---|----|-----------|----|--|----|
| 1 | 210-RZC FB-040710-RZC | W | 11 | 0103308MB | 21 | | 31 |
| 2 | 210-RZC EB-040710-RZC | W | 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

VALIDATION FINDINGS WORKSHEET
Field Blanks

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y N N/A Were field blanks identified in this SDG?

Blank units: pg/L Associated sample units: pg/g

Sampling date: 4/8/10

Field blank type: (circle one) Field Blank X Rinsate / Other: Associated Samples: None

| Compound | Blank ID | Sample Identification | | | | | | | | | |
|----------|-----------------|-----------------------|--|--|--|--|--|--|--|--|--|
| | FB-04072010-RZC | 5X | | | | | | | | | |
| C | 0.77 | 0.00385 | | | | | | | | | |
| D | 0.74 | 0.0037 | | | | | | | | | |
| E | 0.82 | 0.0041 | | | | | | | | | |
| F | 4.2 | 0.021 | | | | | | | | | |
| G | 37 | 0.185 | | | | | | | | | |
| H | 0.57 | 0.00285 | | | | | | | | | |
| I | 0.96 | 0.0048 | | | | | | | | | |
| J | 0.67 | 0.00335 | | | | | | | | | |
| K | 1.1 | 0.0055 | | | | | | | | | |
| L | 0.96 | 0.0048 | | | | | | | | | |
| M | 1.0 | 0.005 | | | | | | | | | |
| N | 1.0 | 0.005 | | | | | | | | | |
| O | 2.1 | 0.0105 | | | | | | | | | |
| P | 1.5 | 0.0075 | | | | | | | | | |
| Q | 6.7 | 0.0335 | | | | | | | | | |
| 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".

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 13, 2010
LDC Report Date: June 10, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B & 4
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0D150462

Sample Identification

SSAI3-02-1BPC
SSAI3-03-1BPC
SSAK3-01-1BPC
SSAJ3-03-1BPC
SSAI2-01-1BPC**
SA207-12BPC
SSAI3-02-1BPCMS
SSAI3-02-1BPCMSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 8 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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 of the 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. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

The exact mass of 380.9760 of PFK was verified. The static resolving power was at least 10,000 (10% valley definition) for samples on which Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

The minimum S/N ratio for each target compound was greater than or equal to 2.5 and greater than or equal to 10 for each recovery and internal standard compound for samples on which Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|---|---|---|
| 0110455MB | 4/20/10 | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,6,7,8-HpCDF | 0.31 pg/g 0.31 pg/g 0.30 pg/g | SA207-12BPC |
| 0109260MB | 4/19/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.14 pg/g 0.59 pg/g 0.28 pg/g 0.14 pg/g 0.24 pg/g 0.14 pg/g 0.086 pg/g 0.30 pg/g 0.13 pg/g 0.63 pg/g | SSAI3-02-1BPC SSAI3-03-1BPC SSAK3-01-1BPC SSAJ3-03-1BPC SSAI2-01-1BPC** |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|---------------|--|--|--|
| SSAI3-02-1BPC | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF | 0.31 pg/g 0.31 pg/g 0.34 pg/g 0.53 pg/g | 0.31U pg/g 0.31U pg/g 0.34U pg/g 0.53U pg/g |
| SSAI3-03-1BPC | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8,9-HxCDF | 0.47 pg/g 2.8 pg/g 0.22 pg/g | 0.47U pg/g 2.8U pg/g 0.22U pg/g |
| SSAJ3-03-1BPC | OCDD 2,3,7,8-TCDF 1,2,3,7,8,9-HxCDF | 0.87 pg/g 1.1 pg/g 0.30 pg/g | 0.87U pg/g 1.1U pg/g 0.30U pg/g |

Sample EB-04132010-RIG3-RZD (from SDG G0D150582) was identified as an equipment blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|----------------------|---------------|--|--|---|
| EB-04132010-RIG3-RZD | 4/13/10 | 1,2,3,6,7,8-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.39 pg/L 1.3 pg/L 3.1 pg/L 2.8 pg/L 2.3 pg/L 1.4 pg/L 4.6 pg/L 2.7 pg/L 1.0 pg/L 0.48 pg/L 5.9 pg/L 2.3 pg/L 9.9 pg/L | SSAI3-02-1BPC SSAI3-03-1BPC SSAK3-01-1BPC SSAJ3-03-1BPC SSAI2-01-1BPC** |

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

Samples FB-04072010-RZD (from SDG G0D090441) and FB-04072010-RZC (from SDG G0D130519) were identified as field blanks. No polychlorinated dioxin/dibenzofuran contaminants were found in these blanks with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|--|--|---|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | SSAI3-02-1BPC SSAI3-03-1BPC SSAK3-01-1BPC SSAJ3-03-1BPC SSAI2-01-1BPC** |
| FB-04072010-RZC | 4/8/10 | 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.77 pg/L 0.74 pg/L 0.82 pg/L 4.2 pg/L 37 pg/L 0.57 pg/L 0.96 pg/L 0.67 pg/L 1.1 pg/L 0.96 pg/L 1.0 pg/L 1.0 pg/L 2.1 pg/L 1.5 pg/L 6.7 pg/L | SA207-12BPC |

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

VI. 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.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|---------------|----------------------|-------------|--------------|--|--------|
| SSAI3-03-1BPC | ¹³ C-OCDD | 22 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |
| SSAJ3-03-1BPC | ¹³ C-OCDD | 27 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

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.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|---------------|---|---|---|---|--------|
| SSAK3-01-1BPC | 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D150462 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D150462 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

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

XII. System Performance

The system performance was acceptable for samples on which a Stage 4 review was performed. 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 SSAI3-03-1BPC_FD (from SDG G0D150589) and SSAI3-03-1BPC and samples SSAI2-01-1BPC_FD (from SDG G0D150589) and SSAI2-01-1BPC were identified as field duplicates. No polychlorinated dioxins/dibenzofurans were detected in any of the samples with the following exceptions:

| Compound | Concentration (pg/g) | | RPD (Limits) | Difference (Limits) | Flags | A or P |
|---------------------|----------------------|---------------|--------------|---------------------|-------|--------|
| | SSAI3-03-1BPC_FD | SSAI3-03-1BPC | | | | |
| 1,2,3,7,8-PeCDD | 0.12 | 2.5U | - | 2.38 (≤2.5) | - | - |
| 1,2,3,4,7,8-HxCDD | 0.090 | 0.061 | - | 0.029 (≤2.6) | - | - |
| 1,2,3,6,7,8-HxCDD | 0.24 | 0.16 | - | 0.08 (≤2.6) | - | - |
| 1,2,3,7,8,9-HxCDD | 0.24 | 0.17 | - | 0.07 (≤2.6) | - | - |
| 1,2,3,4,6,7,8-HpCDD | 2.8 | 0.47 | - | 2.33 (≤2.6) | - | - |

| Compound | Concentration (pg/g) | | RPD (Limits) | Difference (Limits) | Flags | A or P |
|---------------------|----------------------|---------------|--------------|----------------------|-----------------|--------|
| | SSAI3-03-1BPC_FD | SSAI3-03-1BPC | | | | |
| OCDD | 59 | 2.8 | - | 56.2 (≤ 5.2) | J (all detects) | A |
| 2,3,7,8-TCDF | 0.80 | 0.49U | - | 0.31 (≤ 0.49) | - | - |
| 1,2,3,7,8-PeCDF | 0.91 | 0.72 | - | 0.19 (≤ 2.6) | - | - |
| 2,3,4,7,8-PeCDF | 0.55 | 0.33 | - | 0.22 (≤ 2.6) | - | - |
| 1,2,3,4,7,8-HxCDF | 1.7 | 1.5 | - | 0.2 (≤ 2.6) | - | - |
| 1,2,3,6,7,8-HxCDF | 1.1 | 1.2 | - | 0.1 (≤ 2.6) | - | - |
| 2,3,4,6,7,8-HxCDF | 0.29 | 0.25 | - | 0.04 (≤ 2.6) | - | - |
| 1,2,3,7,8,9-HxCDF | 0.30 | 0.22 | - | 0.08 (≤ 2.6) | - | - |
| 1,2,3,4,6,7,8-HpCDF | 3.9 | 3.1 | - | 0.8 (≤ 2.6) | - | - |
| 1,2,3,4,7,8,9-HpCDF | 1.6 | 1.4 | - | 0.2 (≤ 2.6) | - | - |
| OCDF | 16 | 12 | - | 4 (≤ 5.2) | - | - |

| Compound | Concentration (pg/g) | | RPD (Limits) | Difference (Limits) | Flags | A or P |
|---------------------|----------------------|---------------|-----------------|----------------------|-------|--------|
| | SSAI2-01-1BPC_FD | SSAI2-01-1BPC | | | | |
| 2,3,7,8-TCDD | 0.10 | 0.13 | - | 0.03 (≤ 0.53) | - | - |
| 1,2,3,7,8-PeCDD | 0.23 | 0.18 | - | 0.05 (≤ 2.6) | - | - |
| 1,2,3,4,7,8-HxCDD | 0.26 | 0.24 | - | 0.02 (≤ 2.6) | - | - |
| 1,2,3,6,7,8-HxCDD | 3.3 | 2.9 | - | 0.4 (≤ 2.6) | - | - |
| 1,2,3,7,8,9-HxCDD | 1.3 | 0.85 | - | 0.45 (≤ 2.6) | - | - |
| 1,2,3,4,6,7,8-HpCDD | 22 | 21 | 5 (≤ 50) | - | - | - |
| OCDD | 2.8 | 3.6 | - | 0.8 (≤ 5.3) | - | - |

| Compound | Concentration (pg/g) | | RPD (Limits) | Difference (Limits) | Flags | A or P |
|---------------------|----------------------|---------------|------------------|------------------------|-------|--------|
| | SSAI2-01-1BPC_FD | SSAI2-01-1BPC | | | | |
| 2,3,7,8-TCDF | 1.4 | 2.3 | - | 0.9 (≤ 0.53) | - | - |
| 1,2,3,7,8-PeCDF | 2.6 | 3.8 | - | 1.2 (≤ 2.6) | - | - |
| 2,3,4,7,8-PeCDF | 1.5 | 1.7 | - | 0.2 (≤ 2.6) | - | - |
| 1,2,3,4,7,8-HxCDF | 8.0 | 7.1 | - | 0.9 (≤ 2.6) | - | - |
| 1,2,3,6,7,8-HxCDF | 4.9 | 5.7 | - | 0.8 (≤ 2.6) | - | - |
| 2,3,4,6,7,8-HxCDF | 1.1 | 1.3 | - | 0.2 (≤ 2.6) | - | - |
| 1,2,3,7,8,9-HxCDF | 0.85 | 0.61 | - | 0.24 (≤ 2.6) | - | - |
| 1,2,3,4,6,7,8-HpCDF | 18 | 19 | 5 (≤ 50) | - | - | - |
| 1,2,3,4,7,8,9-HpCDF | 7.3 | 9.0 | - | 1.7 (≤ 2.6) | - | - |
| OCDF | 48 | 60 | 22 (≤ 50) | - | - | - |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D150462**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|--|---|--|--------|---------------------------------------|
| G0D150462 | SSAI3-03-1BPC SSAJ3-03-1BPC | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D150462 | SSAK3-01-1BPC | 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF | J (all detects) J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D150462 | SSAI3-02-1BPC SSAI3-03-1BPC SSAK3-01-1BPC SSAJ3-03-1BPC SSAI2-01-1BPC** SA207-12BPC | All compounds reported below the PQL | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D150462 | SSAI3-02-1BPC SSAI3-03-1BPC SSAK3-01-1BPC SSAJ3-03-1BPC SSAI2-01-1BPC** SA207-12BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |
| G0D150462 | SSAI3-03-1BPC | OCDD | J (all detects) | A | Field duplicates (Difference) (fd) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D150462**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|---------------|--|--|--------|------|
| G0D150462 | SSAI3-02-1BPC | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF | 0.31U pg/g 0.31U pg/g 0.34U pg/g 0.53U pg/g | A | bl |
| G0D150462 | SSAI3-03-1BPC | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8,9-HxCDF | 0.47U pg/g 2.8U pg/g 0.22U pg/g | A | bl |
| G0D150462 | SSAJ3-03-1BPC | OCDD 2,3,7,8-TCDF 1,2,3,7,8,9-HxCDF | 0.87U pg/g 1.1U pg/g 0.30U pg/g | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG
G0D150462**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D150462**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B/4

LDC #: 23265D21
 SDG #: G0D150462
 Laboratory: Test America

Date: 4/8/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/13/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/TCV | A | |
| V. | Blanks | W | |
| VI. | Matrix spike/Matrix spike duplicates | A | |
| VII. | Laboratory control samples | A | 109 |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | W | |
| X. | Target compound identifications | A | Not reviewed for Stage 2B validation. |
| XI. | Compound quantitation and CRQLs | W | Not reviewed for Stage 2B validation. |
| XII. | System performance | A | Not reviewed for Stage 2B validation. |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | W | D=2+SSAI3-03-1BPC-FD, 5+SSAI2-01-7BPC(G0D150589) |
| XV. | Field blanks | W | FB-04072010-R2D(G0D090441), FB-04072010-R2C(G0D150589), EB-04132010-R1G3-R2D(G0D150589) |

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

Validated Samples: ** Indicates sample underwent State 4 validation

| | | | | | |
|----|------------------|----|-----------|----|----|
| 1 | SSAI3-02-1BPC | 11 | 0109260MB | 21 | 31 |
| 2 | SSAI3-03-1BPC | 12 | 0110455MB | 22 | 32 |
| 3 | SSAK3-01-1BPC | 13 | | 23 | 33 |
| 4 | SSAJ3-03-1BPC | 14 | | 24 | 34 |
| 5 | SSAI2-01-1BPC ** | 15 | | 25 | 35 |
| 6 | SA207-12BPC | 16 | | 26 | 36 |
| 7 | SSAI3-02-1BPCMS | 17 | | 27 | 37 |
| 8 | SSAI3-02-1BPCMSD | 18 | | 28 | 38 |
| 9 | | 19 | | 29 | 39 |
| 10 | | 20 | | 30 | 40 |

Notes: _____

VALIDATION FINDINGS CHECKLIST

Method: Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| Validation Area | Yes | No | NA | Findings/Comments |
|--|-------------------------------------|--------------------------|--------------------------|-------------------|
| I. Technical holding times | | | | |
| All technical holding times were met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Cooler temperature criteria was met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| II. GC/MS Instrument performance check | | | | |
| Was PFK exact mass 380.9760 verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the retention time windows established for all homologues? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomers $\leq 25\%$? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the static resolving power at least 10,000 (10% valley definition)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the mass resolution adequately check with PFK? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the presence of 1,2,8,9-TCDD and 1,3,4,6,8-PeCDF verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| III. Initial calibration | | | | |
| Was the initial calibration performed at 5 concentration levels? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent relative standard deviations (%RSD) $\leq 20\%$ for unlabeled standards and $< 30\%$ for labeled standards? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Did all calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the signal to noise ratio for each target compound ≥ 2.5 and for each recovery and internal standard ≥ 10 ? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| IV. Continuing calibration | | | | |
| Was a routine calibration performed at the beginning and end of each 12 hour period? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent differences (%D) $\leq 20\%$ for unlabeled standards and $\leq 30\%$ for labeled standards? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Did all routine calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| V. Blanks | | | | |
| Was a method blank associated with every sample in this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was a method blank performed for each matrix and concentration? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| VI. 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| VII. Laboratory control samples | | | | |
| Was an LCS analyzed for this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was an LCS analyzed per extraction batch? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| | | | |
|---|--|-------------------------------------|--|
| VIII. Regional Quality Assurance and Quality Control | | | |
| Were performance evaluation (PE) samples performed? | | <input checked="" type="checkbox"/> | |
| Were the performance evaluation (PE) samples within the acceptance limits? | | <input checked="" type="checkbox"/> | |
| IX. Internal standards | | | |
| Were internal standard recoveries within the 40-135% criteria? | | <input checked="" type="checkbox"/> | |
| Was the minimum S/N ratio of all internal standard peaks ≥ 10 ? | | <input checked="" type="checkbox"/> | |
| X. Target compound identification | | | |
| For 2,3,7,8 substituted congeners with associated labeled standards, were the retention times of the two quantitation peaks within -1 to 3 sec. of the RT of the labeled standard? | | <input checked="" type="checkbox"/> | |
| For 2,3,7,8 substituted congeners without associated labeled standards, were the relative retention times of the two quantitation peaks within 0.005 time units of the RRT measured in the routine calibration? | | <input checked="" type="checkbox"/> | |
| For non-2,3,7,8 substituted congeners, were the retention times of the two quantitation peaks within RT established in the performance check solution? | | <input checked="" type="checkbox"/> | |
| Did compound spectra contain all characteristic ions listed in the table attached? | | <input checked="" type="checkbox"/> | |
| Was the Ion Abundance Ratio for the two quantitation ions within criteria? | | <input checked="" type="checkbox"/> | |
| Was the signal to noise ratio for each target compound and labeled standard > 2.5 ? | | <input checked="" type="checkbox"/> | |
| Does the maximum intensity of each specified characteristic ion coincide within ± 2 seconds (includes labeled standards)? | | <input checked="" type="checkbox"/> | |
| For PCDF identification, was any signal ($S/N \geq 2.5$, at \pm seconds RT) detected in the corresponding PCDF channel? | | <input checked="" type="checkbox"/> | |
| Was an acceptable lock mass recorded and monitored? | | <input checked="" type="checkbox"/> | |
| XI. Compound quantitation/CRQLs | | | |
| Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound? | | <input checked="" type="checkbox"/> | |
| Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation? | | <input checked="" type="checkbox"/> | |
| XII. System performance | | | |
| System performance was found to be acceptable. | | <input checked="" type="checkbox"/> | |
| XIII. Overall assessment of data | | | |
| Overall assessment of data was found to be acceptable. | | <input checked="" type="checkbox"/> | |
| XIV. Field duplicates | | | |
| Field duplicate pairs were identified in this SDG. | | <input checked="" type="checkbox"/> | |
| Target compounds were detected in the field duplicates. | | <input checked="" type="checkbox"/> | |
| XV. Field blanks | | | |
| Field blanks were identified in this SDG. | | <input checked="" type="checkbox"/> | |
| Target compounds were detected in the field blanks. | | <input checked="" type="checkbox"/> | |

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

LDC # 23265D21
SDG # See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y N N/A Were field blanks identified in this SDG?

Blank units: pg/L Associated sample units: pg/g

Sampling date: 4/8/10

Field blank type: (circle one) Field Blank / Rinsate / Other: Associated Samples: 6

| Compound | Blank ID | 5X | Sample Identification |
|----------|-----------------|---------|-----------------------|
| | FB-04072010-RZC | 5X | |
| C | 0.77 | 0.00385 | |
| D | 0.74 | 0.0037 | |
| E | 0.82 | 0.0041 | |
| F | 4.2 | 0.021 | |
| G | 37 | 0.185 | |
| H | 0.57 | 0.00285 | |
| I | 0.96 | 0.0048 | |
| J | 0.67 | 0.00335 | |
| K | 1.1 | 0.0055 | |
| L | 0.96 | 0.0048 | |
| M | 1.0 | 0.005 | |
| N | 1.0 | 0.005 | |
| O | 2.1 | 0.0105 | |
| P | 1.5 | 0.0075 | |
| Q | 6.7 | 0.0335 | |
| 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#: 23265D21
 SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y N NA
Y N NA

Were field duplicate pairs identified in this SDG?
 Were target analytes detected in the field duplicate pairs?

| Compound | Concentration (pg/g) | | (<=50) RPD | (pg/g) Difference | (pg/g) Limits | Qualifications (Parent Only) |
|----------|----------------------|-------|---------------|----------------------|------------------|---------------------------------|
| | SSAI3-03-1BPC_FD | 2 | | | | |
| B | 0.12 | 2.5U | | 2.38 | (<=2.5) | |
| C | 0.090 | 0.061 | | 0.029 | (<=2.6) | |
| D | 0.24 | 0.16 | | 0.08 | (<=2.6) | |
| E | 0.24 | 0.17 | | 0.07 | (<=2.6) | |
| F | 2.8 | 0.47 | | 2.33 | (<=2.6) | |
| G | 59 | 2.8 | | 56.2 | (<=5.2) | Islets / A |
| H | 0.80 | 0.49U | | 0.31 | (<=0.49) | |
| I | 0.91 | 0.72 | | 0.19 | (<=2.6) | |
| J | 0.55 | 0.33 | | 0.22 | (<=2.6) | |
| K | 1.7 | 1.5 | | 0.2 | (<=2.6) | |
| L | 1.1 | 1.2 | | 0.1 | (<=2.6) | |
| M | 0.29 | 0.25 | | 0.04 | (<=2.6) | |
| N | 0.30 | 0.22 | | 0.08 | (<=2.6) | |
| O | 3.9 | 3.1 | | 0.8 | (<=2.6) | |
| P | 1.6 | 1.4 | | 0.2 | (<=2.6) | |
| Q | 16 | 12 | | 4 | (<=5.2) | |

| Compound | Concentration (pg/g) | | (<=50) RPD | (pg/g) Difference | (pg/g) Limits | Qualifications (Parent Only) |
|----------|----------------------|------|---------------|----------------------|------------------|---------------------------------|
| | SSAI2-01-1BPC_FD | 5 | | | | |
| A | 0.10 | 0.13 | | 0.03 | (<=0.53) | |
| B | 0.23 | 0.18 | | 0.05 | (<=2.6) | |
| C | 0.26 | 0.24 | | 0.02 | (<=2.6) | |
| D | 3.3 | 2.9 | | 0.4 | (<=2.6) | |
| E | 1.3 | 0.85 | | 0.45 | (<=2.6) | |
| F | 22 | 21 | 5 | | | |
| G | 2.8 | 3.6 | | 0.8 | (<=5.3) | |
| H | 1.4 | 2.3 | | 0.9 | (<=0.53) | |

LDC#: 23265^PF21
 SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

| Compound | Concentration (pg/g) | | (≤50) | (pg/g) | (pg/g) | Qualifications (Parent Only) |
|----------|----------------------|------|-------|------------|--------|---------------------------------|
| | SSAI2-01-1BPC_FD | 5 | RPD | Difference | Limits | |
| I | 2.6 | 3.8 | | 1.2 | (≤2.6) | |
| J | 1.5 | 1.7 | | 0.2 | (≤2.6) | |
| K | 8.0 | 7.1 | | 0.9 | (≤2.6) | |
| L | 4.9 | 5.7 | | 0.8 | (≤2.6) | |
| M | 1.1 | 1.3 | | 0.2 | (≤2.6) | |
| N | 0.85 | 0.61 | | 0.24 | (≤2.6) | |
| O | 18 | 19 | 5 | | | |
| P | 7.3 | 9.0 | | 1.7 | (≤2.6) | |
| Q | 48 | 60 | 22 | | | |

V:\FIELD DUPLICATES\23265D21.wpd

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

$RRF = (A_x)(C_{is}) / (A_{is})(C_x)$
 average RRF = sum of the RRFs/number of standards
 $\%RSD = 100 * (S/X)$

A_x = Area of compound,
 C_x = Concentration of compound,
 S = Standard deviation of the RRFs,
 A_{is} = Area of associated internal standard
 C_{is} = Concentration of internal standard
 X = Mean of the RRFs

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Average RRF (Initial) | | Average RRF (Recalculated) | | RRF (CS3std) | | RRF (CS3std) | | %RSD | | |
|---|---------------|------------------|--|-----------------------|--------------|----------------------------|--------------|--------------|--------------|--------------|--------------|---------|-------|--|
| | | | | Reported | Recalculated | Reported | Recalculated | Reported | Recalculated | Reported | Recalculated | | | |
| 1 | 12AZ (305) | 3/4/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.98315 | 0.98315 | 1.0872 | 1.01872 | 1.0872 | 1.01872 | 4.65926 | 4.65926 | 4.65926 | 4.659 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.05105 | 1.05105 | 1.11325 | 1.11325 | 1.11325 | 1.11325 | 7.43940 | 7.43940 | 7.43940 | 7.440 | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.08449 | 1.08449 | 1.09101 | 1.09101 | 1.09101 | 1.09101 | 5.63091 | 5.63091 | 5.63091 | 5.631 | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.03068 | 1.03068 | 1.08562 | 1.08562 | 1.08562 | 1.08562 | 4.49467 | 4.49467 | 4.49467 | 4.495 | |
| | | | OCDF (¹³ C-OCDF) | 1.42582 | 1.42582 | 1.57900 | 1.57900 | 1.57900 | 1.57900 | 8.93881 | 8.93881 | 8.93881 | 8.939 | |
| 2 | 12AZ (405) | 4/12/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.945 | 0.945 | 0.98 | 0.98 | 0.98 | 0.98 | 4.44 | 4.44 | 4.44 | 4.33 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.021 | 1.021 | 1.04 | 1.04 | 1.04 | 1.04 | 3.03 | 3.03 | 3.03 | 2.97 | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.114 | 1.114 | 1.19 | 1.19 | 1.19 | 1.19 | 5.33 | 5.33 | 5.33 | 5.25 | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.072 | 1.072 | 1.11 | 1.11 | 1.11 | 1.11 | 3.60 | 3.60 | 3.60 | 3.75 | |
| | | | OCDF (¹³ C-OCDF) | 1.445 | 1.445 | 1.51 | 1.51 | 1.51 | 1.51 | 5.83 | 5.83 | 5.83 | 5.89 | |
| 3 | 12AZ | 4/24/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 1.088 | 1.10 | 1.10 | 1.10 | 1.10 | 1.09 | 1.09 | 1.09 | 1.20 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | | | | | | |
| | | | OCDF (¹³ C-OCDF) | | | | | | | | | | | |

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.

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

LDC #: 226522
 SDG #: 226022

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 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Difference = $100 * (\text{ave. RRF} - \text{RRF}) / \text{ave. RRF}$ Where: ave. RRF = initial calibration average RRF
 RRF = $(A_x)(C_s) / (A_s)(C_x)$ RRF = continuing calibration RRF
 A_s = Area of compound, A_x = Area of associated internal standard
 C_s = Concentration of compound, C_x = Concentration of internal standard

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Average RRF (Initial) | Reported | | Recalculated | |
|---|------------------|------------------|--|-----------------------|----------|-----|--------------|-----|
| | | | | | RRF (CC) | %D | RRF (CC) | %D |
| 1 | <u>24810405</u> | <u>4/29/10</u> | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.945 | 0.90 | 4.3 | 0.90 | 4.3 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.021 | 0.96 | 6.3 | 0.96 | 6.3 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.114 | 1.08 | 3.1 | 1.08 | 3.1 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.072 | 1.03 | 3.9 | 1.03 | 3.9 |
| | | | OCDF (¹³ C-OCDD) | 1.445 | 1.36 | 5.9 | 1.36 | 5.9 |
| 2 | <u>28810405</u> | <u>4/29/10</u> | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.98315 | 0.91217 | 7.2 | 0.91217 | 7.2 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.05105 | 1.06595 | 1.4 | 1.06595 | 1.4 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.08249 | 1.08867 | 0.1 | 1.08867 | 0.1 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.03068 | 1.06354 | 3.2 | 1.06354 | 3.2 |
| | | | OCDF (¹³ C-OCDD) | 1.42582 | 1.43843 | 0.9 | 1.43843 | 0.9 |
| 3 | <u>611102512</u> | <u>5/1/10</u> | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 1.08 | 1.0 | 1.08 | 1.0 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | |

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

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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 = $100 * (SSR - SR) / SA$ Where: SSR = Spiked sample result, SR = Sample result
 SA = Spike added

RPD = $|MSR - MSDR| * 2 / (MSR + MSDR)$ MSR = Matrix spike percent recovery MSDR = Matrix spike duplicate percent recovery

MS/MSD samples: 7/8

| Compound | Spike Added | | Sample Concentration | Spiked Sample Concentration | | Matrix Spike Percent Recovery | | Matrix Spike Duplicate Percent Recovery | | Reported RPD | Recalculated RPD |
|---------------------|-------------|------|----------------------|-----------------------------|------|-------------------------------|--------|---|--------|--------------|------------------|
| | MS | MSD | | MS | MSD | Reported | Recalc | Reported | Recalc | | |
| | | | | | | | | | | | |
| 2,3,7,8-TCDD | 22.6 | 24.5 | ND | 23.5 | 28.5 | 104 | 104 | 116 | 116 | 19 | 19 |
| 1,2,3,7,8-PeCDD | 113 | 123 | ↓ | 119 | 132 | 106 | 105 | 108 | 107 | 10 | 10 |
| 1,2,3,4,7,8-HxCDD | ↓ | ↓ | ↓ | 87.7 | 125 | 78 | 78 | 102 | 102 | 35 | 35 |
| 1,2,3,4,7,8,9-HpCDF | ↓ | ↓ | 0.80 | 134 | 147 | 118 | 118 | 119 | 119 | 87 | 9.2 |
| OCDF | 226 | 245 | 7.1 | 277 | 304 | 120 | 119 | 121 | 121 | 9.4 | 9.3 |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |

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

| Descriptor | Accurate mass ^(a) | Ion ID | Elemental Composition | Analyte | Descriptor | Accurate Mass ^(b) | Ion ID | Elemental Composition | Analyte | | | |
|------------|------------------------------|----------|---|--|------------|------------------------------|------------|--|---|---|---|------|
| 1 | 303.9016 | M | C ₁₂ H ₄ ³⁵ Cl ₂ O | TCDF | 4 | 407.7818 | M+2 | C ₁₂ H ₄ ³⁵ Cl ₂ ³⁷ ClO | HpCDF | | | |
| | 305.8987 | M+2 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO | TCDF | | HpCDF | | | | | | |
| | 315.9419 | M | ¹³ C ₁₂ H ₄ ³⁵ Cl ₂ O | TCDF (S) | | M | 409.7788 | M+4 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O | HpCDF (S) | | |
| | 317.9389 | M+2 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO | TCDF (S) | | M+2 | 417.8250 | M | ¹³ C ₁₂ H ₄ ³⁵ Cl ₂ O | HpCDF (S) | | |
| | 319.8965 | M | C ₁₂ H ₄ ³⁵ Cl ₂ O ₂ | TCDD | | M+2 | 419.8220 | M+2 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO | HpCDD | | |
| | 321.8936 | M+2 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂ | TCDD | | M+2 | 423.7767 | M+2 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂ | HpCDD | | |
| | 331.9368 | M | ¹³ C ₁₂ H ₄ ³⁵ Cl ₂ O ₂ | TCDD (S) | | M+4 | 425.7737 | M+4 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | HpCDD (S) | | |
| | 333.9338 | M+2 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂ | TCDD (S) | | M+2 | 435.8169 | M+2 | ¹³ C ₁₂ H ₄ ³⁵ Cl ₂ ³⁷ ClO ₂ | HpCDD (S) | | |
| | 375.8364 | M+2 | C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO | HxCDFE | | M+4 | 437.8140 | M+4 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | HpCDD (S) | | |
| | [354.9792] | LOCK | C ₉ F ₁₃ | PFK | | M+4 | 479.7165 | M+4 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O | NCDPE | | |
| | | | | | | | [430.9728] | LOCK | | PFK | | |
| | 2 | 339.8597 | M+2 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO | | PeCDF | 5 | 441.7428 | M+2 | C ₁₂ ³⁵ Cl ₃ ³⁷ ClO | OCDF | |
| | | 341.8567 | M+4 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O | | PeCDF | | M+4 | 443.7399 | M+4 | ¹³ C ₁₂ ³⁵ Cl ₃ ³⁷ Cl ₂ O | OCDF |
| 351.9000 | | M+2 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO | PeCDF (S) | M+2 | 457.7377 | | M+2 | C ₁₂ ³⁵ Cl ₃ ³⁷ ClO ₂ | OCDD | | |
| 353.8970 | | M+4 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O | PeCDF (S) | M+4 | 459.7348 | | M+4 | ¹³ C ₁₂ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | OCDD | | |
| 355.8546 | | M+2 | C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO ₂ | PeCDD | M+2 | 469.7780 | | M+2 | ¹³ C ₁₂ ³⁵ Cl ₃ ³⁷ ClO ₂ | OCDD (S) | | |
| 357.8516 | | M+4 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | PeCDD | M+4 | 471.7750 | | M+4 | ¹³ C ₁₂ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | OCDD (S) | | |
| 367.8949 | | M+2 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO ₂ | PeCDD (S) | M+2 | 513.6775 | | M+2 | C ₁₂ ³⁵ Cl ₃ ³⁷ Cl ₂ O | DCDPE | | |
| 369.8919 | | M+4 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | PeCDD (S) | M+4 | [422.9278] | | M+4 | ¹³ C ₁₂ ³⁵ Cl ₃ ³⁷ Cl ₂ O | PFK | | |
| 409.7974 | | M+2 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO | HpCDPE | LOCK | | | LOCK | | | | |
| [354.9792] | | LOCK | C ₉ F ₁₃ | PFK | | | | | | | | |
| 3 | | 373.8208 | M+2 | C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO | HxCDF | | | | | | | |
| | | 375.8178 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ Cl ₂ O | HxCDF | | | | | | | |
| | | 383.8639 | M | ¹³ C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO | HxCDF (S) | | | | | | | |
| | 385.8610 | M+2 | C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO | HxCDF (S) | | | | | | | | |
| | 389.8156 | M+2 | C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ ClO ₂ | HxCDD | | | | | | | | |
| | 391.8127 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ Cl ₂ O ₂ | HxCDD | | | | | | | | |
| | 401.8559 | M+2 | ¹³ C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO ₂ | HxCDD (S) | | | | | | | | |
| | 403.8529 | M+4 | ¹³ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ Cl ₂ O ₂ | HxCDD (S) | | | | | | | | |
| | 445.7555 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₆ ³⁷ Cl ₂ O | OCDFE | | | | | | | | |
| | [430.9728] | LOCK | C ₉ F ₁₇ | PFK | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |

(a) The following nuclidic masses were used:

H = 1.007825
 C = 12.000000
¹³C = 13.003355
 F = 18.9984
 O = 15.994915
³⁵Cl = 34.968853
³⁷Cl = 36.965903

S = internal/recovery standard

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 13, 2010
LDC Report Date: June 9, 2010
Matrix: Water
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0D150582

Sample Identification

EB-04132010-RIG3-RZD
FB-04132010-RIG2-RZE

Introduction

This data review covers 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|---|--|------------------------------|
| 0111312MB | 4/21/10 | 1,2,3,7,8-PeCDD 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.64 pg/L 0.83 pg/L 1.0 pg/L 1.3 pg/L 2.1 pg/L 6.6 pg/L 0.78 pg/L 0.79 pg/L 1.2 pg/L 1.2 pg/L 1.6 pg/L 2.2 pg/L 1.6 pg/L 1.7 pg/L 3.5 pg/L | All samples in SDG GOD150582 |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|----------------------|--|--|--|
| EB-04132010-RIG3-RZD | 1,2,3,6,7,8-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.39 pg/L 1.3 pg/L 3.1 pg/L 2.3 pg/L 1.4 pg/L 4.6 pg/L 2.7 pg/L 1.0 pg/L 0.48 pg/L 5.9 pg/L 2.3 pg/L 9.9 pg/L | 0.39U pg/L 1.3U pg/L 3.1U pg/L 2.3U pg/L 1.4U pg/L 4.6U pg/L 2.7U pg/L 1.0U pg/L 0.48U pg/L 5.9U pg/L 2.3U pg/L 9.9U pg/L |
| FB-04132010-RIG2-RZE | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.40 pg/L 0.65 pg/L 2.5 pg/L 0.66 pg/L 0.41 pg/L 0.53 pg/L 0.97 pg/L | 0.40U pg/L 0.65U pg/L 2.5U pg/L 0.66U pg/L 0.41U pg/L 0.53U pg/L 0.97U pg/L |

Sample EB-04132010-RIG3-RZD was identified as an equipment blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|----------------------|---------------|--|--|-----------------------------------|
| EB-04132010-RIG3-RZD | 4/13/10 | 1,2,3,6,7,8-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.39 pg/L 1.3 pg/L 3.1 pg/L 2.8 pg/L 2.3 pg/L 1.4 pg/L 4.6 pg/L 2.7 pg/L 1.0 pg/L 0.48 pg/L 5.9 pg/L 2.3 pg/L 9.9 pg/L | No associated samples in this SDG |

Sample FB-04132010-RIG2-RZE was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|----------------------|---------------|---|--|-----------------------------------|
| FB-04132010-RIG2-RZE | 4/13/10 | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.40 pg/L 0.65 pg/L 2.5 pg/L 0.66 pg/L 0.41 pg/L 0.53 pg/L 0.97 pg/L | No associated samples in this SDG |

VI. 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.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits.

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|----------------------|--------------|--|---|------|--------|
| EB-04132010-RIG3-RZD | 2,3,7,8-TCDF | 2nd column confirmation was not performed for this compound. | This compound must be confirmed on the 2nd column per the method. | None | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D150582 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D150582 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D150582**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|--|---------------------------------------|------------------|--------|---------------------------------|
| G0D150582 | EB-04132010-RIG3-RZD | 2,3,7,8-TCDF | None | P | Project Quantitation Limit (o) |
| G0D150582 | EB-04132010-RIG3-RZD FB-04132010-RIG2-RZE | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D150582 | EB-04132010-RIG3-RZD FB-04132010-RIG2-RZE | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0D150582**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|----------------------|--|--|--------|------|
| G0D150582 | EB-04132010-RIG3-RZD | 1,2,3,6,7,8-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.39U pg/L 1.3U pg/L 3.1U pg/L 2.3U pg/L 1.4U pg/L 4.6U pg/L 2.7U pg/L 1.0U pg/L 0.48U pg/L 5.9U pg/L 2.3U pg/L 9.9U pg/L | A | bl |
| G0D150582 | FB-04132010-RIG2-RZE | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.40U pg/L 0.65U pg/L 2.5U pg/L 0.66U pg/L 0.41U pg/L 0.53U pg/L 0.97U pg/L | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG G0D150582**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D150582**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265E21
 SDG #: G0D150582
 Laboratory: Test America

Date: 6/8/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/13/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ICV | A | |
| V. | Blanks | W | |
| VI. | Matrix spike/Matrix spike duplicates | N | direct spiked |
| VII. | Laboratory control samples | A | 100 |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | A | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | SW | |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | W | EB = 1. FB = 2. |

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 | EB-04132010-RIG3-RZD W | 11 | | 21 | | 31 | |
| 2 | FB-04132010-RIG2-RZE V | 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDD |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

METHOD: HRGC/HRMS Dioxins (EPA Method 8290)

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

Y N N/A Were all samples associated with a method blank?

Y N N/A Was a method blank performed for each matrix and whenever a sample extraction was performed?

Y N N/A Was the method blank contaminated? If yes, please see qualification below.

Blank extraction date: 4/21/10 Blank analysis date: 5/1/10

Conc. units: pg/L

Associated samples: All (bl)

| Compound | | Blank ID | Sample Identification | |
|----------|------|-----------|-----------------------|--------|
| | | | 1 | 2 |
| | 5X | 0111312MB | | |
| B | 3.2 | 0.64 | | |
| C | 4.15 | 0.83 | | |
| D | 5 | 1.0 | 0.39/U | |
| E | 6.5 | 1.3 | | 0.40/U |
| F | 10.5 | 2.1 | 1.3/U | 0.65/U |
| G | 33 | 6.6 | 3.1/U | 2.5/U |
| I | 3.9 | 0.78 | 2.3/U | |
| J | 3.95 | 0.79 | 1.4/U | |
| K | 6 | 1.2 | 4.6/U | 0.66/U |
| L | 6 | 1.2 | 2.7/U | |
| M | 8 | 1.6 | 1.0/U | 0.41/U |
| N | 11 | 2.2 | 0.48/U | |
| O | 8 | 1.6 | 5.9/U | 0.53/U |
| P | 8.5 | 1.7 | 2.3/U | |
| Q | 17.5 | 3.5 | 9.9/U | 0.97/U |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
All contaminants within five times the method blank concentration were qualified as not detected, "U".

LDC #: 23265E21

SDG #: See Cover

VALIDATION FINDINGS WORKSHEET Field Blanks

Page: 6 of 7

Reviewer: [Signature]

2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y/N N/A Were field blanks identified in this SDG?

Blank units: pg/L **Associated sample units:** pg/g

Sampling date: 4/13/10

Field blank type: (circle one) Field Blank / Rinsate / Other: FB Associated Samples: None

| Compound | Blank ID | 5X | Sample Identification |
|----------|----------------------|---------|-----------------------|
| | FB_04132010_RIG3-RZD | | |
| D | 0.39 | 0.00195 | |
| F | 1.3 | 0.0065 | |
| G | 3.1 | 0.0155 | |
| H | 2.8 | 0.014 | |
| I | 2.3 | 0.0115 | |
| J | 1.4 | 0.007 | |
| K | 4.6 | 0.023 | |
| L | 2.7 | 0.0135 | |
| M | 1.0 | 0.005 | |
| N | 0.48 | 0.0024 | |
| O | 5.9 | 0.0295 | |
| P | 2.3 | 0.0115 | |
| Q | 9.9 | 0.0495 | |
| CRQL | | | |

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

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

Y N N/A Were the correct internal standard (IS), quantitation ions and relative response factors (RRF) used to quantitate the compound?
Y N N/A Compound quantitation and CRQLs were adjusted to reflect all sample dilutions and dry weight factors (if necessary).

| # | Date | Sample ID | Finding | Associated Samples | Qualifications |
|---|------|-----------|----------------------------------|--------------------|----------------|
| | | M | ZAPE results | M | ✓ K (K) |
| | | 1 | No confirmation for 2.3.7.8-TCDF | 1 | None ✓ |
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Comments: See sample calculation verification worksheet for recalculations

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 13, 2010
LDC Report Date: June 9, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.
Sample Delivery Group (SDG): G0D150589

Sample Identification

SSAI3-03-1BPC_FD
SSAI2-01-1BPC_FD

Introduction

This data review covers 2 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- 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. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|---|---|------------------------------|
| 0109260MB | 4/19/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.14 pg/g 0.59 pg/g 0.28 pg/g 0.14 pg/g 0.24 pg/g 0.14 pg/g 0.086 pg/g 0.30 pg/g 0.13 pg/g 0.63 pg/g | All samples in SDG GOD150589 |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|------------------|-----------------------------------|------------------------|------------------------------|
| SSAI3-03-1BPC_FD | 2,3,7,8-TCDF 1,2,3,7,8,9-HxCDF | 0.80 pg/g 0.30 pg/g | 0.80U pg/g 0.30U pg/g |
| SSAI2-01-1BPC_FD | OCDD | 2.8 pg/g | 2.8U pg/g |

Sample EB-04132010-RIG3-RZD (from SDG GOD150582) was identified as an equipment blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|----------------------|---------------|--|--|------------------------------|
| EB-04132010-RIG3-RZD | 4/13/10 | 1,2,3,6,7,8-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.39 pg/L 1.3 pg/L 3.1 pg/L 2.8 pg/L 2.3 pg/L 1.4 pg/L 4.6 pg/L 2.7 pg/L 1.0 pg/L 0.48 pg/L 5.9 pg/L 2.3 pg/L 9.9 pg/L | All samples in SDG GOD150589 |

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

Sample FB-04072010-RZD (from SDG GOD090441) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---|---|---------------------------------|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | All samples in SDG G0D150589 |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|------------------|---|--|---|---|--------|
| SSAI3-03-1BPC_FD | ¹³ C-1,2,3,4,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-OCDD | 38 (40-135) 28 (40-135) 25 (40-135) 10 (40-135) | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D150589 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D150589 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

Samples SSAI3-03-1BPC_FD and SSAI3-03-1BPC (from SDG G0D150462) and samples SSAI2-01-1BPC_FD and SSAI2-01-1BPC (from SDG G0D150462) were identified as field duplicates. No polychlorinated dioxins/dibenzofurans were detected in any of the samples with the following exceptions:

| Compound | Concentration (pg/g) | | RPD (Limits) | Difference (Limits) | Flags | A or P |
|-------------------|----------------------|---------------|--------------|----------------------|-------|--------|
| | SSAI3-03-1BPC_FD | SSAI3-03-1BPC | | | | |
| 1,2,3,7,8-PeCDD | 0.12 | 2.5U | - | 2.38 (≤ 2.5) | - | - |
| 1,2,3,4,7,8-HxCDD | 0.09 | 0.061 | - | 0.029 (≤ 2.6) | - | - |

| Compound | Concentration (pg/g) | | RPD (Limits) | Difference (Limits) | Flags | A or P |
|---------------------|----------------------|---------------|--------------|----------------------|-----------------|--------|
| | SSAI3-03-1BPC_FD | SSAI3-03-1BPC | | | | |
| 1,2,3,6,7,8-HxCDD | 0.24 | 0.16 | - | 0.08 (≤ 2.6) | - | - |
| 1,2,3,7,8,9-HxCDD | 0.24 | 0.17 | - | 0.07 (≤ 2.6) | - | - |
| 1,2,3,4,6,7,8-HpCDD | 2.8 | 0.47 | - | 2.33 (≤ 2.6) | - | - |
| OCDD | 59 | 2.8 | - | 56.2 (≤ 5.2) | J (all detects) | A |
| 2,3,7,8-TCDF | 0.80 | 0.49U | - | 0.31 (≤ 0.49) | - | - |
| 1,2,3,7,8-PeCDF | 0.91 | 0.72 | - | 0.19 (≤ 2.6) | - | - |
| 2,3,4,7,8-PeCDF | 0.55 | 0.33 | - | 0.22 (≤ 2.6) | - | - |
| 1,2,3,4,7,8-HxCDF | 1.7 | 1.5 | - | 0.2 (≤ 2.6) | - | - |
| 1,2,3,6,7,8-HxCDF | 1.1 | 1.2 | - | 0.1 (≤ 2.6) | - | - |
| 2,3,4,6,7,8-HxCDF | 0.29 | 0.25 | - | 0.04 (≤ 2.6) | - | - |
| 1,2,3,7,8,9-HxCDF | 0.30 | 0.22 | - | 0.08 (≤ 2.6) | - | - |
| 1,2,3,4,6,7,8-HpCDF | 3.9 | 3.1 | - | 0.8 (≤ 2.6) | - | - |
| 1,2,3,4,7,8,9-HpCDF | 1.6 | 1.4 | - | 0.2 (≤ 2.6) | - | - |
| OCDF | 16 | 12 | - | 4 (≤ 5.2) | - | - |

| Compound | Concentration (pg/g) | | RPD (Limits) | Difference (Limits) | Flags | A or P |
|-------------------|----------------------|---------------|--------------|----------------------|-------|--------|
| | SSAI2-01-1BPC_FD | SSAI2-01-1BPC | | | | |
| 2,3,7,8-TCDD | 0.10 | 0.13 | - | 0.03 (≤ 0.53) | - | - |
| 1,2,3,7,8-PeCDD | 0.23 | 0.18 | - | 0.05 (≤ 2.6) | - | - |
| 1,2,3,4,7,8-HxCDD | 0.26 | 0.24 | - | 0.02 (≤ 2.6) | - | - |
| 1,2,3,6,7,8-HxCDD | 3.3 | 2.9 | - | 0.4 (≤ 2.6) | - | - |

| Compound | Concentration (pg/g) | | RPD (Limits) | Difference (Limits) | Flags | A or P |
|---------------------|----------------------|---------------|--------------|---------------------|-------|--------|
| | SSAI2-01-1BPC_FD | SSAI2-01-1BPC | | | | |
| 1,2,3,7,8,9-HxCDD | 1.3 | 0.85 | - | 0.45 (≤2.6) | - | - |
| 1,2,3,4,6,7,8-HpCDD | 22 | 21 | 5 (≤50) | - | - | - |
| OCDD | 2.8 | 3.6 | - | 0.8 (≤5.3) | - | - |
| 2,3,7,8-TCDF | 1.4 | 2.3 | - | 0.9 (≤0.53) | - | - |
| 1,2,3,7,8-PeCDF | 2.6 | 3.8 | - | 1.2 (≤2.6) | - | - |
| 2,3,4,7,8-PeCDF | 1.5 | 1.7 | - | 0.2 (≤2.6) | - | - |
| 1,2,3,4,7,8-HxCDF | 8.0 | 7.1 | - | 0.9 (≤2.6) | - | - |
| 1,2,3,6,7,8-HxCDF | 4.9 | 5.7 | - | 0.8 (≤2.6) | - | - |
| 2,3,4,6,7,8-HxCDF | 1.1 | 1.3 | - | 0.2 (≤2.6) | - | - |
| 1,2,3,7,8,9-HxCDF | 0.85 | 0.61 | - | 0.24 (≤2.6) | - | - |
| 1,2,3,4,6,7,8-HpCDF | 18 | 19 | 5 (≤50) | - | - | - |
| 1,2,3,4,7,8,9-HpCDF | 7.3 | 9.0 | - | 1.7 (≤2.6) | - | - |
| OCDF | 48 | 60 | 22 (≤50) | - | - | - |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D150589**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|--------------------------------------|---|---|--------|---------------------------------------|
| G0D150589 | SSAI3-03-1BPC_FD | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D150589 | SSAI3-03-1BPC_FD SSAI2-01-1BPC_FD | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D150589 | SSAI3-03-1BPC_FD SSAI2-01-1BPC_FD | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |
| G0D150589 | SSAI3-03-1BPC_FD | OCDD | J (all detects) | A | Field duplicates (Difference) (fd) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D150589**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|------------------|-----------------------------------|---------------------------------|--------|------|
| G0D150589 | SSAI3-03-1BPC_FD | 2,3,7,8-TCDF 1,2,3,7,8,9-HxCDF | 0.80U pg/g 0.30U pg/g | A | bl |
| G0D150589 | SSAI2-01-1BPC_FD | OCDD | 2.8U pg/g | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG
G0D150589**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D150589**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265F21
 SDG #: G0D150589
 Laboratory: Test America

Date: 6/3/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/13/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ICV | A | |
| V. | Blanks | TW | |
| VI. | Matrix spike/Matrix spike duplicates | TW | No sp/ ass'd - No Anal |
| VII. | Laboratory control samples | A | LOS |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | TW | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | TW/N | |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | TW | D = 1 + SSA13-03-1BPC, 2 + SSA12-01-1BPC (CFD15046 |
| XV. | Field blanks | TW | FB-04072010-R2D (CFD090441), 2B-04132010-R3R2 CFD150582, |

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

Validated Samples:

| | | | | | | | |
|----|------------------|---|----|-----------|----|--|----|
| 1 | SSAI3-03-1BPC_FD | 5 | 11 | 0109=60NB | 21 | | 31 |
| 2 | SSAI2-01-1BPC_FD | ✓ | 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDD |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

LDC #23265F21
SDG # See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y N N/A Were field blanks identified in this SDG?

Blank units: pg/L Associated sample units: pg/g

Sampling date: 4/13/10

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

Associated Samples: All

| Compound | Blank ID | Sample Identification |
|----------|----------------------|-----------------------|
| | EB-04132010-RIG3-RZD | 5X |
| D | 0.39 | 0.00195 |
| F | 1.3 | 0.0065 |
| G | 3.1 | 0.0155 |
| H | 2.8 | 0.014 |
| I | 2.3 | 0.0115 |
| J | 1.4 | 0.007 |
| K | 4.6 | 0.023 |
| L | 2.7 | 0.0135 |
| M | 1.0 | 0.005 |
| N | 0.48 | 0.0024 |
| O | 5.9 | 0.0295 |
| P | 2.3 | 0.0115 |
| Q | 9.9 | 0.0495 |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| 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#: 23265F21
 SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y N NA
Y N NA

Were field duplicate pairs identified in this SDG?
 Were target analytes detected in the field duplicate pairs?

| Compound | Concentration (pg/g) | | (<50) RPD | (pg/g) Difference | (pg/g) Limits | Qualifications (Parent Only) |
|----------|----------------------|---------------|--------------|----------------------|------------------|---------------------------------|
| | 1 | SSAI3-03-1BPC | | | | |
| B | 0.12 | 2.5U | | 2.38 | (≤2.5) | |
| C | 0.090 | 0.061 | | 0.029 | (≤2.6) | |
| D | 0.24 | 0.16 | | 0.08 | (≤2.6) | |
| E | 0.24 | 0.17 | | 0.07 | (≤2.6) | |
| F | 2.8 | 0.47 | | 2.33 | (≤2.6) | |
| G | 59 | 2.8 | | 56.2 | (≤5.2) | <u>lots A</u> (+d) |
| H | 0.80 | 0.49U | | 0.31 | (≤0.49) | |
| I | 0.91 | 0.72 | | 0.19 | (≤2.6) | |
| J | 0.55 | 0.33 | | 0.22 | (≤2.6) | |
| K | 1.7 | 1.5 | | 0.2 | (≤2.6) | |
| L | 1.1 | 1.2 | | 0.1 | (≤2.6) | |
| M | 0.29 | 0.25 | | 0.04 | (≤2.6) | |
| N | 0.30 | 0.22 | | 0.08 | (≤2.6) | |
| O | 3.9 | 3.1 | | 0.8 | (≤2.6) | |
| P | 1.6 | 1.4 | | 0.2 | (≤2.6) | |
| Q | 16 | 12 | | 4 | (≤5.2) | |

| Compound | Concentration (pg/g) | | (<50) RPD | (pg/g) Difference | (pg/g) Limits | Qualifications (Parent Only) |
|----------|----------------------|---------------|--------------|----------------------|------------------|---------------------------------|
| | 2 | SSAI2-01-1BPC | | | | |
| A | 0.10 | 0.13 | | 0.03 | (≤0.53) | |
| B | 0.23 | 0.18 | | 0.05 | (≤2.6) | |
| C | 0.26 | 0.24 | | 0.02 | (≤2.6) | |
| D | 3.3 | 2.9 | | 0.4 | (≤2.6) | |
| E | 1.3 | 0.85 | | 0.45 | (≤2.6) | |
| F | 22 | 21 | 5 | | | |
| G | 2.8 | 3.6 | | 0.8 | (≤5.3) | |
| H | 1.4 | 2.3 | | 0.9 | (≤0.53) | |

LDC#: 23265F21
 SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

| Compound | Concentration (pg/g) | | (≤50) | (pg/g) | (pg/g) | Qualifications (Parent Only) |
|----------|----------------------|---------------|-------|------------|--------|---------------------------------|
| | 2 | SSAI2-01-1BPC | RPD | Difference | Limits | |
| I | 2.6 | 3.8 | | 1.2 | (≤2.6) | |
| J | 1.5 | 1.7 | | 0.2 | (≤2.6) | |
| K | 8.0 | 7.1 | | 0.9 | (≤2.6) | |
| L | 4.9 | 5.7 | | 0.8 | (≤2.6) | |
| M | 1.1 | 1.3 | | 0.2 | (≤2.6) | |
| N | 0.85 | 0.61 | | 0.24 | (≤2.6) | |
| O | 18 | 19 | 5 | | | |
| P | 7.3 | 9.0 | | 1.7 | (≤2.6) | |
| Q | 48 | 60 | 22 | | | |

V:\FIELD DUPLICATES\23265F21.wpd

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 14 through April 15, 2010
LDC Report Date: June 9, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): GOD160435

Sample Identification

SSAL4-01-1BPC
SSAL4-02-1BPC
SSAK5-01-1BPC
SSAO6-01-1BPC
SSAL2-01-1BPC
SSAL3-01-1BPC
SSAL3-02-1BPC
SSAK4-01-1BPC

Introduction

This data review covers 8 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- 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. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|---|--|
| 0113286MB | 4/23/10 | OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.75 pg/g 0.22 pg/g 0.25 pg/g 0.35 pg/g 0.50 pg/g 0.16 pg/g 0.75 pg/g | SSAL2-01-1BPC |
| 0110455MB | 4/20/10 | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,6,7,8-HpCDF | 0.31 pg/g 0.31 pg/g 0.30 pg/g | SSAL4-01-1BPC SSAL4-02-1BPC SSAK5-01-1BPC SSAO6-01-1BPC SSAL3-01-1BPC SSAK4-01-1BPC |
| 0112236MB | 4/22/10 | OCDD 1,2,3,4,6,7,8-HpCDF OCDF | 0.85 pg/g 0.64 pg/g 1.3 pg/g | SSAL3-02-1BPC |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|---------------|---------------------------------|------------------------|------------------------------|
| SSAL2-01-1BPC | OCDD | 3.4 pg/g | 3.4U pg/g |
| SSAL3-01-1BPC | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF | 0.90 pg/g 1.0 pg/g | 0.90U pg/g 1.0U pg/g |

Samples EB-04142010-RIG1-RZC and EB-04142010-RIG2-RZC (both from SDG GOD160472) were identified as equipment blanks. No polychlorinated dioxin/dibenzofuran contaminants were found in these blanks with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|----------------------|---------------|--|--|--------------------|
| EB-04142010-RIG1-RZC | 4/14/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 1.2 pg/L 9.2 pg/L 0.50 pg/L 0.32 pg/L 0.69 pg/L 0.39 pg/L 0.28 pg/L 0.20 pg/L 0.79 pg/L 0.30 pg/L 1.8 pg/L | SSAO6-01-1BPC |

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|----------------------|---------------|---|---|--------------------|
| EB-04142010-RIG2-RZC | 4/14/10 | 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.29 pg/L 0.39 pg/L 0.77 pg/L 2.5 pg/L 3.3 pg/L 1.6 pg/L 0.73 pg/L 4.2 pg/L 2.2 pg/L 0.71 pg/L 0.43 pg/L 6.6 pg/L 1.9 pg/L 13 pg/L | SSAO6-01-1BPC |

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

Samples FB-04072010-RZC (from SDG G0D130519) and FB-04072010-RZD (from SDG G0D090441) were identified as field blanks. No polychlorinated dioxin/dibenzofuran contaminants were found in these blanks with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|--|--|---|
| FB-04072010-RZC | 4/8/10 | 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.77 pg/L 0.74 pg/L 0.82 pg/L 4.2 pg/L 37 pg/L 0.57 pg/L 0.96 pg/L 0.67 pg/L 1.1 pg/L 0.96 pg/L 1.0 pg/L 1.0 pg/L 2.1 pg/L 1.5 pg/L 6.7 pg/L | SSAO6-01-1BPC |
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | SSAL4-01-1BPC SSAL4-02-1BPC SSAK5-01-1BPC SSAL2-01-1BPC SSAL3-01-1BPC SSAL3-02-1BPC SSAK4-01-1BPC |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|---------------|----------------------|-------------|--------------|--|--------|
| SSAL4-01-1BPC | ¹³ C-OCDD | 32 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |
| SSAL4-02-1BPC | ¹³ C-OCDD | 24 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |
| SSAO6-01-1BPC | ¹³ C-OCDD | 30 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |
| SSAL2-01-1BPC | ¹³ C-OCDD | 22 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |
| SSAL3-01-1BPC | ¹³ C-OCDD | 27 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|---------------|---|---|---|--|--------|
| SSAL4-02-1BPC | 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P |
| SSAK5-01-1BPC | OCDD 2,3,7,8-TCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) | P |
| SSAK4-01-1BPC | 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) J (all detects) | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D160435 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D160435 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D160435**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|--|---|--|--------|------------------------------------|
| G0D160435 | SSAL4-01-1BPC SSAL4-02-1BPC SSAO6-01-1BPC SSAL2-01-1BPC SSAL3-01-1BPC | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D160435 | SSAL4-02-1BPC | 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D160435 | SSAK5-01-1BPC | OCDD 2,3,7,8-TCDF | J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D160435 | SSAK4-01-1BPC | 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF | J (all detects) J (all detects) J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D160435 | SSAL4-01-1BPC SSAL4-02-1BPC SSAK5-01-1BPC SSAO6-01-1BPC SSAL2-01-1BPC SSAL3-01-1BPC SSAL3-02-1BPC SSAK4-01-1BPC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D160435 | SSAL4-01-1BPC SSAL4-02-1BPC SSAK5-01-1BPC SSAO6-01-1BPC SSAL2-01-1BPC SSAL3-01-1BPC SSAL3-02-1BPC SSAK4-01-1BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D160435**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|---------------|----------|---------------------------------|--------|------|
| G0D160435 | SSAL2-01-1BPC | OCDD | 3.4U pg/g | A | bl |

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|---------------|---------------------------------|------------------------------|--------|------|
| G0D160435 | SSAL3-01-1BPC | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF | 0.90U pg/g 1.0U pg/g | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG
G0D160435**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D160435**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265G21
 SDG #: G0D160435
 Laboratory: Test America

Date: 4/2/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/15/10, 4/14/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ICV | A | |
| V. | Blanks | W | |
| VI. | Matrix spike/Matrix spike duplicates | W | No spl ass'd - No Anal |
| VII. | Laboratory control samples | A | LCC |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | W | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | W | |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | W | EB-04142010-R1F1-R2C, EB-04142010-R1F2-R2C (F0D166), FB-04072010-R2D (F0D090441), FB-04072010 (F0D13059) |

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

Validated Samples:

MM 50:15

| | | | | | | | |
|----|---------------|----|-----------|----|--|----|--|
| 1 | SSAL4-01-1BPC | 11 | 0110455MB | 21 | | 31 | |
| 2 | SSAL4-02-1BPC | 12 | 0112236MB | 22 | | 32 | |
| 3 | SSAK5-01-1BPC | 13 | | 23 | | 33 | |
| 4 | SSAO6-01-1BPC | 14 | | 24 | | 34 | |
| 5 | SSAL2-01-1BPC | 15 | | 25 | | 35 | |
| 6 | SSAL3-01-1BPC | 16 | | 26 | | 36 | |
| 7 | SSAL3-02-1BPC | 17 | | 27 | | 37 | |
| 8 | SSAK4-01-1BPC | 18 | | 28 | | 38 | |
| 9 | | 19 | | 29 | | 39 | |
| 10 | | 20 | | 30 | | 40 | |

Notes: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

LDC #: 23265G21
 SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y/N N/A Were field blanks identified in this SDG?

Blank units: pg/L Associated sample units: pg/g

Sampling date: 4/14/10

Field blank type: (circle one) Field Blank / Rinsate / Other: FB Associated Samples: 4 (>5X)

| Compound | Blank ID | Sample Identification |
|----------|----------------------|-----------------------|
| | EB-04142010-RIG2-RZC | 5X |
| D | 0.29 | 0.00145 |
| E | 0.39 | 0.00195 |
| F | 0.77 | 0.00385 |
| G | 2.5 | 0.0125 |
| H | 3.3 | 0.0165 |
| I | 1.6 | 0.008 |
| J | 0.73 | 0.00365 |
| K | 4.2 | 0.021 |
| L | 2.2 | 0.011 |
| M | 0.71 | 0.00355 |
| N | 0.43 | 0.00215 |
| O | 6.6 | 0.033 |
| P | 1.9 | 0.0095 |
| Q | 13 | 0.065 |
| CRQL | | |

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

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

VALIDATION FINDINGS WORKSHEET
Field Blanks

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y **N** **N/A** Were field blanks identified in this SDG?

Blank units: pg/L **Associated sample units:** pg/g

Sampling date: 4/8/10

Field blank type: (circle one) Field Blank / Rinsate / Other: Associated Samples: 4 (>5X)

| Compound | Blank ID | 5X | Sample Identification |
|----------|-----------------|---------|-----------------------|
| | FB-04072010-RZC | 5X | |
| C | 0.77 | 0.00385 | |
| D | 0.74 | 0.0037 | |
| E | 0.82 | 0.0041 | |
| F | 4.2 | 0.021 | |
| G | 37 | 0.185 | |
| H | 0.57 | 0.00285 | |
| I | 0.96 | 0.0048 | |
| J | 0.67 | 0.00335 | |
| K | 1.1 | 0.0055 | |
| L | 0.96 | 0.0048 | |
| M | 1.0 | 0.005 | |
| N | 1.0 | 0.005 | |
| O | 2.1 | 0.0105 | |
| P | 1.5 | 0.0075 | |
| Q | 6.7 | 0.0335 | |
| 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".

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 14, 2010
LDC Report Date: June 9, 2010
Matrix: Water
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.
Sample Delivery Group (SDG): G0D160472

Sample Identification

EB-04142010-RIG1-RZC
EB-04142010-RIG2-RZC

Introduction

This data review covers 2 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|---|--|------------------------------|
| 0111312MB | 4/21/10 | 1,2,3,7,8-PeCDD 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.64 pg/L 0.83 pg/L 1.0 pg/L 1.3 pg/L 2.1 pg/L 6.6 pg/L 0.78 pg/L 0.79 pg/L 1.2 pg/L 1.2 pg/L 1.6 pg/L 2.2 pg/L 1.6 pg/L 1.7 pg/L 3.5 pg/L | All samples in SDG G0D160472 |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|----------------------|---|---|--|
| EB-04142010-RIG1-RZC | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 1.2 pg/L 9.2 pg/L 0.32 pg/L 0.69 pg/L 0.39 pg/L 0.28 pg/L 0.20 pg/L 0.79 pg/L 0.30 pg/L 1.8 pg/L | 1.2U pg/L 9.2U pg/L 0.32U pg/L 0.69U pg/L 0.39U pg/L 0.28U pg/L 0.20U pg/L 0.79U pg/L 0.30U pg/L 1.8U pg/L |
| EB-04142010-RIG2-RZC | 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.29 pg/L 0.39 pg/L 0.77 pg/L 2.5 pg/L 1.6 pg/L 0.73 pg/L 4.2 pg/L 2.2 pg/L 0.71 pg/L 0.43 pg/L 6.6 pg/L 1.9 pg/L 13 pg/L | 0.29U pg/L 0.39U pg/L 0.77U pg/L 2.5U pg/L 1.6U pg/L 0.73U pg/L 4.2U pg/L 2.2U pg/L 0.71U pg/L 0.43U pg/L 6.6U pg/L 1.9U pg/L 13U pg/L |

Samples EB-04142010-RIG1-RZC and EB-04142010-RIG2-RZC were identified as equipment blanks. No polychlorinated dioxin/dibenzofuran contaminants were found in these blanks with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|----------------------|---------------|---|---|-----------------------------------|
| EB-04142010-RIG1-RZC | 4/14/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 1.2 pg/L 9.2 pg/L 0.50 pg/L 0.32 pg/L 0.69 pg/L 0.39 pg/L 0.28 pg/L 0.20 pg/L 0.79 pg/L 0.30 pg/L 1.8 pg/L | No associated samples in this SDG |
| EB-04142010-RIG2-RZC | 4/14/10 | 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.29 pg/L 0.39 pg/L 0.77 pg/L 2.5 pg/L 3.3 pg/L 1.6 pg/L 0.73 pg/L 4.2 pg/L 2.2 pg/L 0.71 pg/L 0.43 pg/L 6.6 pg/L 1.9 pg/L 13 pg/L | No associated samples in this SDG |

VI. 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.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits.

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|------------------------------|--------------|--|---|------|--------|
| All samples in SDG G0D160472 | 2,3,7,8-TCDF | 2nd column confirmation was not performed for this compound. | This compound must be confirmed on the 2nd column per the method. | None | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D160472 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D160472 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D160472**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|--|---------------------------------------|------------------|--------|---------------------------------|
| G0D160472 | EB-04142010-RIG1-RZC EB-04142010-RIG2-RZC | 2,3,7,8-TCDF | None | P | Project Quantitation Limit (o) |
| G0D160472 | EB-04142010-RIG1-RZC EB-04142010-RIG2-RZC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D160472 | EB-04142010-RIG1-RZC EB-04142010-RIG2-RZC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0D160472**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|----------------------|---|--|--------|------|
| G0D160472 | EB-04142010-RIG1-RZC | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 1.2U pg/L 9.2U pg/L 0.32U pg/L 0.69U pg/L 0.39U pg/L 0.28U pg/L 0.20U pg/L 0.79U pg/L 0.30U pg/L 1.8U pg/L | A | bl |
| G0D160472 | EB-04142010-RIG2-RZC | 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.29U pg/L 0.39U pg/L 0.77U pg/L 2.5U pg/L 1.6U pg/L 0.73U pg/L 4.2U pg/L 2.2U pg/L 0.71U pg/L 0.43U pg/L 6.6U pg/L 1.9U pg/L 13U pg/L | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG G0D160472**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265H21
 SDG #: G0D160472
 Laboratory: Test America

Date: 6/8/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/14/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/IX | A | |
| V. | Blanks | TW | |
| VI. | Matrix spike/Matrix spike duplicates | N | did not certify |
| VII. | Laboratory control samples | A | LC |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | A | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | SN | |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | TW | EB = 1.2 |

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

Validated Samples:

| | | | | | | | |
|----|----------------------|---|----|-----------|----|--|----|
| 1 | EB-04142010-RIG1-RZC | W | 11 | 0111312MB | 21 | | 31 |
| 2 | EB-04142010-RIG2-RZC | V | 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDD |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 15, 2010
LDC Report Date: June 10, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B & 4
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0D170485

Sample Identification

SSA06-03-1BPC
SA129-3BPC
SA129-4BPC
SA175-5BPC
SA175-8BPC**

**Indicates sample underwent Stage 4 review

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 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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 of the 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.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

The exact mass of 380.9760 of PFK was verified. The static resolving power was at least 10,000 (10% valley definition) for samples on which Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

The minimum S/N ratio for each target compound was greater than or equal to 2.5 and greater than or equal to 10 for each recovery and internal standard compound for samples on which Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|---|---|
| 0110455MB | 4/20/10 | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,6,7,8-HpCDF | 0.31 pg/g 0.31 pg/g 0.30 pg/g | SSAO6-03-1BPC SA129-3BPC SA129-4BPC |
| 0113206MB | 4/23/10 | OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.75 pg/g 0.22 pg/g 0.25 pg/g 0.35 pg/g 0.50 pg/g 0.16 pg/g 0.75 pg/g | SA175-5BPC SA175-8BPC** |

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

Samples FB-04132010-RIG2-RZE (from SDG G0D150582) and FB-04072010-RZC (from SDG G0D130519) were identified as field blanks. No polychlorinated dioxin/dibenzofuran contaminants were found in these blanks with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|----------------------|---------------|--|--|--|
| FB-04072010-RZC | 4/8/10 | 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.77 pg/L 0.74 pg/L 0.82 pg/L 4.2 pg/L 37 pg/L 0.57 pg/L 0.96 pg/L 0.67 pg/L 1.1 pg/L 0.96 pg/L 1.0 pg/L 1.0 pg/L 2.1 pg/L 1.5 pg/L 6.7 pg/L | SSAO6-03-1BPC |
| FB-04132010-RIG2-RZE | 4/13/10 | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.40 pg/L 0.65 pg/L 2.5 pg/L 0.66 pg/L 0.41 pg/L 0.53 pg/L 0.97 pg/L | SA129-3BPC SA129-4BPC SA175-5BPC SA175-8BPC** |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|---------------|--|---|---|--|--------|
| SSAO6-03-1BPC | ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD | 28 (40-135) 32 (40-135) 16 (40-135) | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P |
| SA129-3BPC | ¹³ C-OCDD | 35 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |
| SA129-4BPC | ¹³ C-OCDD | 30 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |
| SA175-5BPC | ¹³ C-2,3,7,8-TCDF ¹³ C-1,2,3,7,8-PeCDF | 36 (40-135) 163 (40-135) | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF | J (all detects) UJ (all non-detects) | P |
| SA175-8BPC** | ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD | 25 (40-135) 31 (40-135) 22 (40-135) | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

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.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|--------------|--|---|---|---|--------|
| SA129-3BPC | 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) | P |
| SA129-4BPC | 2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) J (all detects) | P |
| SA175-5BPC | 1,2,3,4,6,7,8-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) | A |
| SA175-8BPC** | 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | A |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D170485 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D170485 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

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

XII. System Performance

The system performance was acceptable for samples on which a Stage 4 review was performed. 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

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D170485**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|---|--|---|--------|------------------------------------|
| G0D170485 | SSAO6-03-1BPC SA175-8BPC** | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D170485 | SA129-3BPC SA129-4BPC | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D170485 | SA175-5BPC | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D170485 | SA129-3BPC | 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | J (all detects) J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D170485 | SA129-4BPC | 2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | J (all detects) J (all detects) J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D170485 | SA175-5BPC | 1,2,3,4,6,7,8-HpCDF OCDF | J (all detects) J (all detects) | A | Project Quantitation Limit (e) |
| G0D170485 | SA175-8BPC** | 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | A | Project Quantitation Limit (e) |
| G0D170485 | SSAO6-03-1BPC SA129-3BPC SA129-4BPC SA175-5BPC SA175-8BPC** | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D170485 | SSAO6-03-1BPC SA129-3BPC SA129-4BPC SA175-5BPC SA175-8BPC** | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D170485**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D170485**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 23265121

SDG #: G0D170485

Laboratory: Test America

Stage 2B/4

Date: 4/9/10

Page: 1 of 1

Reviewer: [Signature]

2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/15/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ICV | A | |
| V. | Blanks | W | |
| VI. | Matrix spike/Matrix spike duplicates | W | No sp/ass'd - No Cond |
| VII. | Laboratory control samples | A | ICS |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | W | |
| X. | Target compound identifications | A | Not reviewed for Stage 2B validation. |
| XI. | Compound quantitation and CRQLs | W | Not reviewed for Stage 2B validation. |
| XII. | System performance | A | Not reviewed for Stage 2B validation. |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | W | FB-04132010-RIG2-R2E (G0D150582) FB-04072010 (G0D130519) |

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

Validated Samples: ** Indicates sample underwent State 4 validation

| | | | | | |
|----|---------------|----|-----------|----|----|
| 1 | SSAO6-03-1BPC | 11 | 0110455MB | 21 | 31 |
| 2 | SA129-3BPC | 12 | 0113286MB | 22 | 32 |
| 3 | SA129-4BPC | 13 | | 23 | 33 |
| 4 | SA175-5BPC | 14 | | 24 | 34 |
| 5 | SA175-8BPC ** | 15 | | 25 | 35 |
| 6 | | 16 | | 26 | 36 |
| 7 | | 17 | | 27 | 37 |
| 8 | | 18 | | 28 | 38 |
| 9 | | 19 | | 29 | 39 |
| 10 | | 20 | | 30 | 40 |

Notes: _____

VALIDATION FINDINGS CHECKLIST

Method: Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| Validation Area | Yes | No | NA | Findings/Comments |
|--|-------------------------------------|-------------------------------------|--------------------------|-------------------|
| I. Technical holding times | | | | |
| All technical holding times were met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Cooler temperature criteria was met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| II. GC/MS Instrument performance check | | | | |
| Was PFK exact mass 380.9760 verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the retention time windows established for all homologues? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomers $\leq 25\%$? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the static resolving power at least 10,000 (10% valley definition)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the mass resolution adequately check with PFK? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the presence of 1,2,8,9-TCDD and 1,3,4,6,8-PeCDF verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| III. Initial calibration | | | | |
| Was the initial calibration performed at 5 concentration levels? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent relative standard deviations (%RSD) $\leq 20\%$ for unlabeled standards and $\leq 30\%$ for labeled standards? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Did all calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the signal to noise ratio for each target compound ≥ 2.5 and for each recovery and internal standard ≥ 10 ? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| IV. Continuing calibration | | | | |
| Was a routine calibration performed at the beginning and end of each 12 hour period? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent differences (%D) $\leq 20\%$ for unlabeled standards and $\leq 30\%$ for labeled standards? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Did all routine calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| V. Blanks | | | | |
| Was a method blank associated with every sample in this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was a method blank performed for each matrix and concentration? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| VI. 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| VII. Laboratory control samples | | | | |
| Was an LCS analyzed for this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was an LCS analyzed per extraction batch? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

VALIDATION FINDINGS CHECKLIST

| | | | |
|---|--|--|---|
| VIII. Regional Quality Assurance and Quality Control | | | |
| Were performance evaluation (PE) samples performed? | | | / |
| Were the performance evaluation (PE) samples within the acceptance limits? | | | / |
| IX. Internal standards | | | |
| Were internal standard recoveries within the 40-135% criteria? | | | / |
| Was the minimum S/N ratio of all internal standard peaks ≥ 10 ? | | | / |
| X. Target compound identification | | | |
| For 2,3,7,8 substituted congeners with associated labeled standards, were the retention times of the two quantitation peaks within -1 to 3 sec. of the RT of the labeled standard? | | | / |
| For 2,3,7,8 substituted congeners without associated labeled standards, were the relative retention times of the two quantitation peaks within 0.005 time units of the RRT measured in the routine calibration? | | | / |
| For non-2,3,7,8 substituted congeners, were the retention times of the two quantitation peaks within RT established in the performance check solution? | | | / |
| Did compound spectra contain all characteristic ions listed in the table attached? | | | / |
| Was the Ion Abundance Ratio for the two quantitation ions within criteria? | | | / |
| Was the signal to noise ratio for each target compound and labeled standard ≥ 2.5 ? | | | / |
| Does the maximum intensity of each specified characteristic ion coincide within ± 2 seconds (includes labeled standards)? | | | / |
| For PCDF identification, was any signal ($S/N \geq 2.5$, at \pm seconds RT) detected in the corresponding PCDPE channel? | | | / |
| Was an acceptable lock mass recorded and monitored? | | | / |
| XI. Compound quantitation/CRQLs | | | |
| Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound? | | | / |
| 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. | | | / |

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

VALIDATION FINDINGS WORKSHEET
Field Blanks

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y-N N/A Were field blanks identified in this SDG?

Blank units: pg/L Associated sample units: pg/g

Sampling date: 4/8/10

Field blank type: (circle one) Field Blank Rinsate / Other: Associated Samples: 1 (>5X)

| Compound | Blank ID | 5X | Sample Identification |
|----------|-----------------|---------|-----------------------|
| | FB-04072010-RZC | 5X | |
| C | 0.77 | 0.00385 | |
| D | 0.74 | 0.0037 | |
| E | 0.82 | 0.0041 | |
| F | 4.2 | 0.021 | |
| G | 37 | 0.185 | |
| H | 0.57 | 0.00285 | |
| I | 0.96 | 0.0048 | |
| J | 0.67 | 0.00335 | |
| K | 1.1 | 0.0055 | |
| L | 0.96 | 0.0048 | |
| M | 1.0 | 0.005 | |
| N | 1.0 | 0.005 | |
| O | 2.1 | 0.0105 | |
| P | 1.5 | 0.0075 | |
| Q | 6.7 | 0.0335 | |
| 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 #: 232652
 SDG #: 20000000

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

Y N N/A Were the correct internal standard (IS), quantitation ions and relative response factors (RRF) used to quantitate the compound?
Y N N/A Compound quantitation and CRQLs were adjusted to reflect all sample dilutions and dry weight factors (if necessary).

| # | Date | Sample ID | Finding | Associated Samples | Qualifications |
|-----|------|-----------|------------------------------|--------------------|-------------------------|
| | | | <i>spks > calib range</i> | | |
| 2 | | | K.O. R | 2 | None (e) |
| 3 | | | H.K.O. R | 3 | ↓ |
| 4 | | | O.R | 4 | None / A (e) |
| 5 | | | I.N.K.L.O.P. R | 5 | ↓ |
| All | | | ZMPC results | nd | JK (f) |
| | | | | | |
| | | | | | |
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| | | | | | |

Comments: See sample calculation verification worksheet for recalculations

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

$RRF = (A_x)(C_s)/(A_s)(C_x)$
 average RRF = sum of the RRFs/number of standards
 $\%RSD = 100 * (S/X)$

A_x = Area of compound,
 C_x = Concentration of compound,
 S = Standard deviation of the RRFs,
 A_s = Area of associated internal standard
 C_s = Concentration of internal standard
 X = Mean of the RRFs

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Reported | | Recalculated | | Reported | | Recalculated | |
|---|---------------|------------------|--|-----------------------|---------------|-----------------------|---------------|----------|------|---------------|------|
| | | | | Average RRF (Initial) | RRF (Initial) | Average RRF (Initial) | RRF (CS3 std) | %RSD | %RSD | RRF (CS3 std) | %RSD |
| 1 | 1012 (105) | 1/10/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.860 | 0.87 | 0.860 | 0.87 | 10.4 | 10.4 | 0.87 | 10.6 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 0.934 | 0.95 | 0.934 | 0.95 | 10.9 | 10.9 | 0.95 | 12.8 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.058 | 1.09 | 1.058 | 1.09 | 11.2 | 11.2 | 1.09 | 11.0 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.998 | 1.05 | 0.998 | 1.05 | 12.2 | 12.2 | 1.05 | 12.2 |
| | | | OCDF (¹³ C-OCDD) | 1.437 | 1.52 | 1.437 | 1.52 | 14.1 | 14.1 | 1.52 | 14.0 |
| 2 | 1012 (405) | 4/21/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 1.10 | 1.088 | 1.10 | 10.9 | 10.9 | 1.10 | 1.20 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | | | | |
| 3 | 1012 (405) | 4/21/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.945 | 0.98 | 0.945 | 0.98 | 4.44 | 4.44 | 0.98 | 4.33 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.021 | 1.04 | 1.021 | 1.04 | 8.03 | 8.03 | 1.04 | 8.97 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.114 | 1.19 | 1.114 | 1.19 | 5.33 | 5.33 | 1.19 | 5.25 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.072 | 1.11 | 1.072 | 1.11 | 3.60 | 3.60 | 1.11 | 3.75 |
| | | | OCDF (¹³ C-OCDD) | 1.445 | 1.51 | 1.445 | 1.51 | 5.85 | 5.85 | 1.51 | 5.89 |

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.

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

LDC #: 23265121
 SDG #: SAI 0010

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Difference = $100 * (\text{ave. RRF} - \text{RRF}) / \text{ave. RRF}$ Where: ave. RRF = initial calibration average RRF
 RRF = $(A_x)(C_s) / (A_s)(C_x)$ RRF = continuing calibration RRF
 A_x = Area of compound, A_s = Area of associated internal standard
 C_x = Concentration of compound, C_s = Concentration of internal standard

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Average RRF (Initial) | Reported | | Recalculated | |
|---|-------------|------------------|--|-----------------------|----------|------|--------------|------|
| | | | | | RRF (CC) | %D | RRF (CC) | %D |
| 1 | 294701DS | 4/29/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.860 | 0.90 | 0.90 | 4.2 | 4.2 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 0.934 | 0.97 | 0.97 | 3.6 | 3.6 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.058 | 1.19 | 1.19 | 12.1 | 12.1 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.998 | 1.01 | 1.01 | 1.6 | 1.6 |
| | | | OCDF (¹³ C-OCDD) | 1.437 | 1.29 | 1.29 | 10.0 | 10.0 |
| 2 | 07M102DS | 5/8/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.945 | 1.00 | 1.00 | 5.6 | 5.5 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.021 | 1.00 | 1.00 | 2.4 | 2.4 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.114 | 1.16 | 1.16 | 3.7 | 3.7 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.072 | 1.08 | 1.08 | 1.0 | 1.0 |
| | | | OCDF (¹³ C-OCDD) | 1.445 | 1.45 | 1.45 | 0.4 | 0.4 |
| 3 | 10M1052R | 5/10/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 0.91 | 0.91 | 16.0 | 16.1 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | |

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

VALIDATION FINDINGS WORKSHEET
Laboratory Control Sample Results Verification

METHOD: GC/MS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Recovery = $100 \cdot \text{SSC}/\text{SA}$ Where: SSC = Spiked sample concentration
 SA = Spike added

RPD = $|(LCS - LCSD) / \frac{1}{2}(LCS + LCSD)|$

LCS = Laboratory control sample percent recovery

LCSD = Laboratory control sample duplicate percent recovery

LCS ID: 0113286

| Compound | Spike Added (pg/g) | | Spiked Sample Concentration (pg/g) | | LCS | | LCSD | | Percent Recovery | | Percent Recovery | | LCS/LCSD | | RPD | |
|---------------------|--------------------|------|------------------------------------|------|----------|--------|----------|--------|------------------|--------|------------------|--------|----------|--------|----------|--------|
| | LCS | LCSD | LCS | LCSD | Reported | Recalc | Reported | Recalc | Reported | Recalc | Reported | Recalc | Reported | Recalc | Reported | Recalc |
| | 2,3,7,8-TCDD | 20.0 | NA | 23.2 | NA | 116 | 116 | 116 | 116 | | | | | | | |
| 1,2,3,7,8-PeCDD | 100 | / | 116 | / | 116 | 116 | 116 | 116 | | | | | | | | |
| 1,2,3,4,7,8-HxCDD | / | / | 107 | / | 107 | 107 | 107 | 107 | | | | | | | | |
| 1,2,3,4,7,8,9-HpCDF | / | / | 126 | / | 126 | 126 | 126 | 126 | | | | | | | | |
| OCDF | 200 | ↓ | 240 | ↓ | 120 | 120 | 120 | 120 | | | | | | | | |
| | | | | | | | | | | | | | | | | |
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Comments: Refer to Laboratory Control Sample findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

| Descriptor | Accurate mass ^(N) | Ion ID | Elemental Composition | Analyte | Descriptor | Accurate Mass ^(N) | Ion ID | Elemental Composition | Analyte | |
|------------|--|---|--|--|------------|--|---|--|--|--|
| 1 | 303.9016 305.8987 315.9419 317.9389 319.8965 321.8936 331.9368 333.9338 375.8364 [354.9792] | M M+2 M M+2 M M+2 M M+2 M+2 LOCK | C ₁₂ H ₄ ³⁵ Cl ₄ O C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO C ₁₂ H ₄ ³⁵ Cl ₄ O ¹³ C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO C ₁₂ H ₄ ³⁵ Cl ₄ O ₂ C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO ₂ ¹³ C ₁₂ H ₄ ³⁵ Cl ₄ O ₂ ¹³ C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO ₂ C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO C ₉ F ₁₃ | TCDF TCDF TCDF (S) TCDF (S) TCDD TCDD TCDD (S) TCDD (S) HxCDFPE PFK | 4 | 407.7818 409.7788 417.8250 419.8220 423.7767 425.7737 435.8169 437.8140 479.7165 [430.9728] | M+2 M+4 M M+2 M+2 M+4 M+2 M+4 M+4 LOCK | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ¹³ C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂ C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO ₂ ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂ ¹³ C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO ₂ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO C ₉ F ₁₃ | HpCDF HpCDF HpCDF (S) HpCDF HpCDD HpCDD HpCDD (S) HpCDD (S) NCDPE PFK | |
| 2 | 339.8597 341.8567 351.9000 353.8970 355.8546 357.8516 367.8949 369.8919 409.7974 [354.9792] | M+2 M+4 M+2 M+4 M+2 M+4 M+2 M+4 M+2 LOCK | C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ¹³ C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO ₂ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂ ¹³ C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO ₂ ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂ C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO C ₉ F ₁₃ | PeCDF PeCDF PeCDF (S) PeCDF (S) PeCDD PeCDD PeCDD (S) PeCDD (S) HxCDFPE PFK | 5 | 441.7428 443.7399 457.7377 459.7348 469.7780 471.7750 513.6775 [422.9278] | M+2 M+4 M+2 M+4 M+2 M+4 M+4 M+4 LOCK | C ₁₂ H ₂ ³⁵ Cl ₃ ³⁷ ClO C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ ClO ¹³ C ₁₂ H ₂ ³⁵ Cl ₃ ³⁷ ClO ¹³ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ ClO C ₁₂ H ₂ ³⁵ Cl ₃ ³⁷ ClO ₂ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ ClO ₂ ¹³ C ₁₂ H ₂ ³⁵ Cl ₃ ³⁷ ClO ₂ ¹³ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ ClO ₂ C ₁₂ H ₂ ³⁵ Cl ₃ ³⁷ ClO C ₉ F ₁₃ | OCDF OCDF OCDD OCDD OCDD (S) OCDD (S) DCDPE PFK | |
| 3 | 373.8208 375.8178 383.8639 385.8610 389.8156 391.8127 401.8559 403.8529 445.7555 [430.9728] | M+2 M+4 M M+2 M+2 M+4 M+2 M+4 M+4 LOCK | C ₁₂ H ₂ ³⁵ Cl ₃ ³⁷ ClO C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ ClO ¹³ C ₁₂ H ₂ ³⁵ Cl ₃ ³⁷ ClO ¹³ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ ClO C ₁₂ H ₂ ³⁵ Cl ₃ ³⁷ ClO ₂ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ ClO ₂ ¹³ C ₁₂ H ₂ ³⁵ Cl ₃ ³⁷ ClO ₂ ¹³ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ ClO ₂ C ₁₂ H ₂ ³⁵ Cl ₃ ³⁷ ClO C ₉ F ₁₃ | HxCDF HxCDF HxCDF (S) HxCDF (S) HxCDD HxCDD HxCDD (S) HxCDD (S) OCDFPE PFK | | | | | | |

(e) The following nuclidic masses were used:

H = 1.007825
C = 12.000000
¹³C = 13.003355
O = 15.994915
³⁵Cl = 34.968853
³⁷Cl = 36.965903
F = 18.9984

S = internal/recovery standard

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 14, 2010
LDC Report Date: June 9, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.
Sample Delivery Group (SDG): G0D170489

Sample Identification

SSAP3-01-1BPC
SA182-5BPC

Introduction

This data review covers 2 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|-------------------------------------|--------------------|
| 0110455MB | 4/20/10 | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,6,7,8-HpCDF | 0.31 pg/g 0.31 pg/g 0.30 pg/g | SSAP3-01-1BPC |

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|-------------------------------------|------------------------------------|--------------------|
| 0112236MB | 4/22/10 | OCDD 1,2,3,4,6,7,8-HpCDF OCDF | 0.85 pg/g 0.64 pg/g 1.3 pg/g | SA182-5BPC |

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

Samples EB04142010-RIG1-RZC and EB-04142010-RIG2-RZC (both from SDG GOD160472) were identified as equipment blanks. No polychlorinated dioxin/dibenzofuran contaminants were found in these blanks with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|----------------------|---------------|---|---|---------------------------------|
| EB-04142010-RIG1-RZC | 4/14/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 1.2 pg/L 9.2 pg/L 0.50 pg/L 0.32 pg/L 0.69 pg/L 0.39 pg/L 0.28 pg/L 0.20 pg/L 0.79 pg/L 0.30 pg/L 1.8 pg/L | All samples in SDG GOD170489 |
| EB-04142010-RIG2-RZC | 4/14/10 | 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.29 pg/L 0.39 pg/L 0.77 pg/L 2.5 pg/L 3.3 pg/L 1.6 pg/L 0.73 pg/L 4.2 pg/L 2.2 pg/L 0.71 pg/L 0.43 pg/L 6.6 pg/L 1.9 pg/L 13 pg/L | All samples in SDG GOD170489 |

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

Sample FB-04072010-RZC (from SDG GOD130519) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|--|--|---------------------------------|
| FB-04072010-RZC | 4/8/10 | 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.77 pg/L 0.74 pg/L 0.82 pg/L 4.2 pg/L 37 pg/L 0.57 pg/L 0.96 pg/L 0.67 pg/L 1.1 pg/L 0.96 pg/L 1.0 pg/L 1.0 pg/L 2.1 pg/L 1.5 pg/L 6.7 pg/L | All samples in SDG GOD170489 |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits.

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|---------------|-----------------------------|---|---|------------------------------------|--------|
| SSAP3-01-1BPC | 1,2,3,4,6,7,8-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) | P |
| SA182-5BPC | OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D170489 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D170489 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D170489**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|-----------------------------|--|------------------------------------|--------|------------------------------------|
| G0D170489 | SSAP3-01-1BPC | 1,2,3,4,6,7,8-HpCDF OCDF | J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D170489 | SA182-5BPC | OCDF | J (all detects) | P | Project Quantitation Limit (e) |
| G0D170489 | SSAP3-01-1BPC SA182-5BPC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D170489 | SSAP3-01-1BPC SA182-5BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D170489**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG
G0D170489**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D170489**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265J21
 SDG #: G0D170489
 Laboratory: Test America

Date: 6/8/10
 Page: 1 of 2
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/14/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ICV | A | |
| V. | Blanks | W | |
| VI. | Matrix spike/Matrix spike duplicates | W | No sp/ass'd - No Anal |
| VII. | Laboratory control samples | A | LC9 |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | A | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | N | |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | W | FB-04072010-R2C (FOD130519) EB-04142010-R1F1-R2C, EB-04142010-R1F2-R2C (FOD1604) |

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

Validated Samples:

| | | | | | | | |
|----|---------------|---|----|-----------|----|--|----|
| 1 | SSAP3-01-1BPC | S | 11 | 0110455MB | 21 | | 31 |
| 2 | SA182-5BPC | V | 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

VALIDATION FINDINGS WORKSHEET
Field Blanks

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y **N** **N/A** Were field blanks identified in this SDG?

Blank units: pg/L Associated sample units: pg/g

Sampling date: 4/8/10

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

Associated Samples: All (>5X)

| Compound | Blank ID | 5X | Sample Identification |
|----------|-----------------|---------|-----------------------|
| | FB-04072010-RZC | 5X | |
| C | 0.77 | 0.00385 | |
| D | 0.74 | 0.0037 | |
| E | 0.82 | 0.0041 | |
| F | 4.2 | 0.021 | |
| G | 37 | 0.185 | |
| H | 0.57 | 0.00285 | |
| I | 0.96 | 0.0048 | |
| J | 0.67 | 0.00335 | |
| K | 1.1 | 0.0055 | |
| L | 0.96 | 0.0048 | |
| M | 1.0 | 0.005 | |
| N | 1.0 | 0.005 | |
| O | 2.1 | 0.0105 | |
| P | 1.5 | 0.0075 | |
| Q | 6.7 | 0.0335 | |
| 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".

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 15, 2010
LDC Report Date: June 10, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B & 4
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0D170491

Sample Identification

SSAL5-04-1BPC
SSAL4-03-1BPC
SSAM4-01-1BPC**

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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 of the 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.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

The exact mass of 380.9760 of PFK was verified. The static resolving power was at least 10,000 (10% valley definition) for samples on which Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

The minimum S/N ratio for each target compound was greater than or equal to 2.5 and greater than or equal to 10 for each recovery and internal standard compound for samples on which Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|-------------------------------------|------------------------------|
| 0110455MB | 4/20/10 | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,6,7,8-HpCDF | 0.31 pg/g 0.31 pg/g 0.30 pg/g | All samples in SDG G0D170491 |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|----------------------|---------------------------------|------------------------|------------------------------|
| SSAL4-03-1BPC | 1,2,3,7,8-PeCDF | 0.72 pg/g | 0.72U pg/g |
| SSAM4-01-1BPC** (5X) | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF | 2.9 pg/g 5.2 pg/g | 2.9U pg/g 5.2U pg/g |

Sample FB-04072010-RZD (from SDG G0D090441) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---|---|------------------------------|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | All samples in SDG G0D170491 |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|---------------|--|---|---|--|--------|
| SSAL5-04-1BPC | ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD | 31 (40-135) 35 (40-135) 23 (40-135) | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P |
| SSAL4-03-1BPC | ¹³ C-OCDD | 32 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

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.

XI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D170491 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D170491 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

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

XII. System Performance

The system performance was acceptable for samples on which a Stage 4 review was performed. 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

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D170491**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|---|---|--|--------|------------------------------------|
| G0D170491 | SSAL5-04-1BPC | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D170491 | SSAL4-03-1BPC | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D170491 | SSAL5-04-1BPC SSAL4-03-1BPC SSAM4-01-1BPC** | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D170491 | SSAL5-04-1BPC SSAL4-03-1BPC SSAM4-01-1BPC** | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D170491**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|----------------------|---------------------------------|---------------------------------|--------|------|
| G0D170491 | SSAL4-03-1BPC | 1,2,3,7,8-PeCDF | 0.72U pg/g | A | bl |
| G0D170491 | SSAM4-01-1BPC** (5X) | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF | 2.9U pg/g 5.2U pg/g | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D170491**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 23265K21
 SDG #: G0D170491
 Laboratory: Test America

Stage 2B/A

Date: 4/13/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/15/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/IOX | A | |
| V. | Blanks | TW | |
| VI. | Matrix spike/Matrix spike duplicates | TW | No sp/ass'd - No Anal |
| VII. | Laboratory control samples | A | CCS |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | TW | |
| X. | Target compound identifications | A | |
| XI. | Compound quantitation and CRQLs | N | |
| XII. | System performance | A | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | TW | FB-04072010-RZD (G0D090441) |

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

Validated Samples: ** 1 env/V

| | | | | | | |
|----|------------------|---|----|-----------|----|----|
| 1 | SSAL5-04-1BPC | 5 | 11 | 0110455M3 | 21 | 31 |
| 2 | SSAL4-03-1BPC | | 12 | | 22 | 32 |
| 3 | SSAM4-01-1BPC ** | V | 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: _____

Method: Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| Validation Area | Yes | No | NA | Findings/Comments |
|--|-----|----|----|-------------------|
| I. Technical holding times | | | | |
| All technical holding times were met. | ✓ | | | |
| Cooler temperature criteria was met. | ✓ | | | |
| II. GC/MS Instrument performance check | | | | |
| Was PFK exact mass 380.9760 verified? | ✓ | | | |
| Were the retention time windows established for all homologues? | ✓ | | | |
| Was the chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomers $\leq 25\%$? | ✓ | | | |
| Is the static resolving power at least 10,000 (10% valley definition)? | ✓ | | | |
| Was the mass resolution adequately check with PFK? | ✓ | | | |
| Was the presence of 1,2,8,9-TCDD and 1,3,4,6,8-PeCDF verified? | ✓ | | | |
| III. Initial calibration | | | | |
| Was the initial calibration performed at 5 concentration levels? | ✓ | | | |
| Were all percent relative standard deviations (%RSD) $\leq 20\%$ for unlabeled standards and $< 30\%$ for labeled standards? | ✓ | | | |
| Did all calibration standards meet the Ion Abundance Ratio criteria? | ✓ | | | |
| Was the signal to noise ratio for each target compound ≥ 2.5 and for each recovery and internal standard ≥ 10 ? | ✓ | | | |
| IV. Continuing calibration | | | | |
| Was a routine calibration performed at the beginning and end of each 12 hour period? | ✓ | | | |
| Were all percent differences (%D) $\leq 20\%$ for unlabeled standards and $\leq 30\%$ for labeled standards? | ✓ | | | |
| Did all routine calibration standards meet the Ion Abundance Ratio criteria? | ✓ | | | |
| V. Blanks | | | | |
| Was a method blank associated with every sample in this SDG? | ✓ | | | |
| Was a method blank performed for each matrix and concentration? | ✓ | | | |
| Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet? | ✓ | | | |
| VI. 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. | ✓ | | | |
| Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits? | | ✓ | | |
| VII. 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? | ✓ | | | |

VALIDATION FINDINGS CHECKLIST

| | | | | |
|---|-------------------------------------|-------------------------------------|-------------------------------------|--|
| VIII. Regional Quality Assurance and Quality Control | | | | |
| Were performance evaluation (PE) samples performed? | | | <input checked="" type="checkbox"/> | |
| Were the performance evaluation (PE) samples within the acceptance limits? | | | <input checked="" type="checkbox"/> | |
| IX. Internal standards | | | | |
| Were internal standard recoveries within the 40-135% criteria? | | | <input checked="" type="checkbox"/> | |
| Was the minimum S/N ratio of all internal standard peaks ≥ 10 ? | | <input checked="" type="checkbox"/> | | |
| X. Target compound identification | | | | |
| For 2,3,7,8 substituted congeners with associated labeled standards, were the retention times of the two quantitation peaks within -1 to 3 sec. of the RT of the labeled standard? | <input checked="" type="checkbox"/> | | | |
| For 2,3,7,8 substituted congeners without associated labeled standards, were the relative retention times of the two quantitation peaks within 0.005 time units of the RRT measured in the routine calibration? | <input checked="" type="checkbox"/> | | | |
| For non-2,3,7,8 substituted congeners, were the retention times of the two quantitation peaks within RT established in the performance check solution? | <input checked="" type="checkbox"/> | | | |
| Did compound spectra contain all characteristic ions listed in the table attached? | <input checked="" type="checkbox"/> | | | |
| Was the Ion Abundance Ratio for the two quantitation ions within criteria? | <input checked="" type="checkbox"/> | | | |
| Was the signal to noise ratio for each target compound and labeled standard ≥ 2.5 ? | <input checked="" type="checkbox"/> | | | |
| Does the maximum intensity of each specified characteristic ion coincide within ± 2 seconds (includes labeled standards)? | <input checked="" type="checkbox"/> | | | |
| For PCDF identification, was any signal ($S/N \geq 2.5$, at \pm seconds RT) detected in the corresponding PCDPE channel? | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | |
| Was an acceptable lock mass recorded and monitored? | <input checked="" type="checkbox"/> | | | |
| XI. Compound quantitation/CRQLs | | | | |
| Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound? | <input checked="" type="checkbox"/> | | | |
| Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation? | <input checked="" type="checkbox"/> | | | |
| XII. System performance | | | | |
| System performance was found to be acceptable. | <input checked="" type="checkbox"/> | | | |
| XIII. Overall assessment of data | | | | |
| Overall assessment of data was found to be acceptable. | <input checked="" type="checkbox"/> | | | |
| XIV. Field duplicates | | | | |
| Field duplicate pairs were identified in this SDG. | | <input checked="" type="checkbox"/> | | |
| Target compounds were detected in the field duplicates. | | | <input checked="" type="checkbox"/> | |
| XV. Field blanks | | | | |
| Field blanks were identified in this SDG. | <input checked="" type="checkbox"/> | | | |
| Target compounds were detected in the field blanks. | <input checked="" type="checkbox"/> | | | |

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

$RRF = (A_i)(C_s)/(A_s)(C_i)$
 average RRF = sum of the RRFs/number of standards
 $\%RSD = 100 * (S/X)$
 A_i = Area of compound,
 C_i = Concentration of compound,
 S = Standard deviation of the RRFs,
 A_s = Area of associated internal standard
 C_s = Concentration of internal standard
 X = Mean of the RRFs

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Reported | | Recalculated | | Reported | | Recalculated | |
|---|---------------|------------------|--|-----------------------|--------|-----------------------|--------|--------------|--------|---------------|--------|
| | | | | Average RRF (Initial) | (%RSD) | Average RRF (Initial) | (%RSD) | RRF (C53std) | (%RSD) | RRF (C53 std) | (%RSD) |
| 1 | 1072 (105) | 1/10/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.860 | 0.87 | 0.860 | 0.87 | 0.87 | 10.4 | 0.87 | 10.6 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 0.934 | 0.95 | 0.934 | 0.95 | 0.95 | 13.9 | 0.95 | 13.8 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.058 | 1.09 | 1.058 | 1.09 | 1.09 | 11.2 | 1.09 | 11.0 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.998 | 1.05 | 0.998 | 1.05 | 1.05 | 12.2 | 1.05 | 12.2 |
| | | | OCDF (¹³ C-OCDD) | 1.437 | 1.52 | 1.437 | 1.52 | 14.1 | 1.52 | 14.0 | |
| 2 | 1072 | 4/21/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 1.10 | 1.088 | 1.10 | 1.10 | 12.9 | 1.10 | 12.0 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | | | | |
| 3 | 1072 (405) | 4/21/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.945 | 0.98 | 0.945 | 0.98 | 0.98 | 4.44 | 0.98 | 4.33 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.021 | 1.04 | 1.021 | 1.04 | 1.04 | 8.03 | 1.04 | 8.97 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.114 | 1.19 | 1.114 | 1.19 | 1.19 | 5.33 | 1.19 | 5.25 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.072 | 1.11 | 1.072 | 1.11 | 1.11 | 3.60 | 1.11 | 3.75 |
| | | | OCDF (¹³ C-OCDD) | 1.445 | 1.51 | 1.445 | 1.51 | 5.85 | 1.51 | 5.89 | |

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.

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Difference = $100 * (\text{ave. RRF} - \text{RRF}) / \text{ave. RRF}$ Where: ave. RRF = initial calibration average RRF
 $\text{RRF} = (A_x)(C_s) / (A_s)(C_x)$ RRF = continuing calibration RRF
 A_x = Area of compound, A_s = Area of associated internal standard
 C_x = Concentration of compound, C_s = Concentration of internal standard

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Average RRF (Initial) | Reported | | Recalculated | |
|---|-------------|------------------|--|-----------------------|----------|-----|--------------|-----|
| | | | | | RRF (CC) | %D | RRF (CC) | %D |
| 1 | 26AP10A115 | 4/26/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.860 | 0.92 | 7.0 | 0.92 | 7.0 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 0.932 | 0.93 | 0.1 | 0.93 | 0.1 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.058 | 1.15 | 8.9 | 1.15 | 8.9 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.998 | 1.06 | 6.2 | 1.06 | 6.2 |
| | | | OCDF (¹³ C-OCDD) | 1.437 | 1.54 | 7.2 | 1.54 | 7.2 |
| 2 | 27AP10A115 | 4/27/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 1.08 | | 1.08 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | |
| 3 | 28AP10A115 | 5/6/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.945 | 0.96 | 1.7 | 0.96 | 1.7 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.021 | 0.96 | 6.1 | 0.96 | 6.1 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.114 | 1.11 | 0.3 | 1.11 | 0.3 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.072 | 1.00 | 6.3 | 1.00 | 6.3 |
| | | | OCDF (¹³ C-OCDD) | 1.445 | 1.40 | 3.0 | 1.40 | 3.0 |

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

VALIDATION FINDINGS WORKSHEET
Laboratory Control Sample Results Verification

METHOD: GC/MS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Recovery = $100 * SSC/SA$ Where: SSC = Spiked sample concentration
 SA = Spike added

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

LCS ID: 0110455

| Compound | Spike Added | | Spiked Sample Concentration | | LCS | | LCSD | | Percent Recovery | | Percent Recovery | | RPD | |
|---------------------|--------------|------|-----------------------------|------|----------|--------|----------|--------|------------------|--------|------------------|--------|----------|--------|
| | LCS | LCSD | LCS | LCSD | Reported | Recalc | Reported | Recalc | Reported | Recalc | Reported | Recalc | Reported | Recalc |
| | 2,3,7,8-TCDD | 20.0 | NA | 19.1 | NA | 96 | 96 | 96 | 96 | | | | | |
| 1,2,3,7,8-PeCDD | 100 | ✓ | 103 | ✓ | 103 | 103 | 103 | 103 | | | | | | |
| 1,2,3,4,7,8-HxCDD | ✓ | ✓ | 95.5 | ✓ | 95 | 95 | 95 | 95 | | | | | | |
| 1,2,3,4,7,8,9-HpCDF | 200 | ✓ | 81.4 | ✓ | 81 | 81 | 81 | 81 | | | | | | |
| OCDF | | | 198 | ✓ | 99 | 99 | 99 | 99 | | | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
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| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |

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

| Descriptor | Accurate mass ^(a) | Ion ID | Elemental Composition | Analyte | Descriptor | Accurate Mass ^(a) | Ion ID | Elemental Composition | Analyte |
|------------|------------------------------|----------|---|--|------------|------------------------------|--------|---|-----------|
| 1 | 303.9016 | M | C ₁₂ H ₃₅ Cl ₉ O | TCDF | 4 | 407.7818 | M+2 | C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO | HpCDF |
| | 305.8987 | M+2 | C ₁₂ H ₃₅ Cl ₉ ³⁷ Cl ₂ O | TCDF | | 409.7788 | M+4 | C ₁₂ H ₃₅ Cl ₉ ³⁷ Cl ₂ O | HpCDF |
| | 315.9419 | M | ¹³ C ₁₂ H ₄ ³⁵ Cl ₉ O | TCDF (S) | | 417.8250 | M | ¹³ C ₁₂ H ₄ ³⁵ Cl ₉ O | HpCDF (S) |
| | 317.9389 | M+2 | ¹³ C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO | TCDF (S) | | 419.8220 | M+2 | ¹³ C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO | HpCDF |
| | 319.8965 | M | C ₁₂ H ₄ ³⁵ Cl ₉ O ₂ | TCDD | | 423.7767 | M+2 | C ₁₂ H ₄ ³⁵ Cl ₉ ³⁷ ClO ₂ | HpCDD |
| | 321.8936 | M+2 | C ₁₂ H ₄ ³⁵ Cl ₉ ³⁷ ClO ₂ | TCDD | | 425.7737 | M+4 | C ₁₂ H ₄ ³⁵ Cl ₉ ³⁷ Cl ₂ O ₂ | HpCDD |
| | 331.9368 | M | ¹³ C ₁₂ H ₃₅ Cl ₉ O ₂ | TCDD (S) | | 435.8169 | M+2 | ¹³ C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO ₂ | HpCDD (S) |
| | 333.9338 | M+2 | ¹³ C ₁₂ H ₄ ³⁵ Cl ₉ ³⁷ ClO ₂ | TCDD (S) | | 437.8140 | M+4 | ¹³ C ₁₂ H ₄ ³⁵ Cl ₉ ³⁷ Cl ₂ O ₂ | HpCDD (S) |
| | 375.8364 | M+2 | C ₁₂ H ₄ ³⁵ Cl ₉ ³⁷ ClO | HxCDFE | | 479.7165 | M+4 | C ₁₂ H ₄ ³⁵ Cl ₉ ³⁷ Cl ₂ O | NCDFE |
| | [354.9792] | LOCK | C ₉ F ₁₃ | PFK | | [430.9728] | LOCK | C ₉ F ₁₇ | PFK |
| | 2 | 339.8597 | M+2 | C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO | | PeCDF | 5 | 441.7428 | M+2 |
| 341.8567 | | M+4 | C ₁₂ H ₃₅ Cl ₉ ³⁷ Cl ₂ O | PeCDF | 443.7399 | M+4 | | C ₁₂ ³⁵ Cl ₉ ³⁷ Cl ₂ O | OCDF |
| 351.9000 | | M+2 | ¹³ C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO | PeCDF (S) | 457.7377 | M+2 | | ¹³ C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO | OCDD |
| 353.8970 | | M+4 | ¹³ C ₁₂ H ₃₅ Cl ₉ ³⁷ Cl ₂ O | PeCDF (S) | 459.7348 | M+4 | | ¹³ C ₁₂ H ₃₅ Cl ₉ ³⁷ Cl ₂ O | OCDD |
| 355.8546 | | M+2 | C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO ₂ | PeCDD | 469.7780 | M+2 | | C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO ₂ | OCDD (S) |
| 357.8516 | | M+4 | C ₁₂ H ₃₅ Cl ₉ ³⁷ Cl ₂ O ₂ | PeCDD | 471.7750 | M+4 | | C ₁₂ H ₃₅ Cl ₉ ³⁷ Cl ₂ O ₂ | OCDD (S) |
| 367.8949 | | M+2 | ¹³ C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO ₂ | PeCDD (S) | 513.6775 | M+2 | | ¹³ C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO ₂ | OCDD (S) |
| 369.8919 | | M+4 | ¹³ C ₁₂ H ₃₅ Cl ₉ ³⁷ Cl ₂ O ₂ | PeCDD (S) | [422.9278] | M+4 | | ¹³ C ₁₂ H ₃₅ Cl ₉ ³⁷ Cl ₂ O ₂ | DCDFE |
| 409.7974 | | M+2 | C ₁₂ H ₃₅ Cl ₉ ³⁷ ClO | HxCDFE | | LOCK | | C ₁₀ F ₁₇ | PFK |
| [354.9792] | | LOCK | C ₉ F ₁₃ | PFK | | | | | |
| 3 | | 373.8208 | M+2 | C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO | HxCDF | | | | |
| | 375.8178 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ Cl ₂ O | HxCDF | | | | | |
| | 383.8639 | M | ¹³ C ₁₂ H ₂ ³⁵ Cl ₅ O | HxCDF (S) | | | | | |
| | 385.8610 | M+2 | ¹³ C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO | HxCDF (S) | | | | | |
| | 389.8156 | M+2 | C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO ₂ | HxCDD | | | | | |
| | 391.8127 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ Cl ₂ O ₂ | HxCDD | | | | | |
| | 401.8559 | M+2 | ¹³ C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO ₂ | HxCDD (S) | | | | | |
| | 403.8529 | M+4 | ¹³ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ Cl ₂ O ₂ | HxCDD (S) | | | | | |
| | 445.7555 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ Cl ₂ O | OCDFE | | | | | |
| | [430.9728] | LOCK | C ₉ F ₁₇ | PFK | | | | | |

(a) The following nucleic masses were used:

H = 1.007825
 C = 12.000000
¹³C = 13.003355
 F = 18.9984
 O = 15.994915
³⁵Cl = 34.968853
³⁷Cl = 36.965903

S = internal/recovery standard

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 16, 2010
LDC Report Date: June 9, 2010
Matrix: Soil/Water
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0D170492

Sample Identification

EB-04152010-1-RZD
SSAL8-01-1BPC
SSAK8-02-1BPC

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- 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. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|-------------------------------------|------------------------------------|--------------------------------------|
| 0112236MB | 4/22/10 | OCDD 1,2,3,4,6,7,8-HpCDF OCDF | 0.85 pg/g 0.64 pg/g 1.3 pg/g | All soil samples in SDG G0D170492 |

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|---|---------------------------------------|
| 0112250MB | 4/22/10 | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 2.1 pg/L 8.4 pg/L 0.92 pg/L 0.52 pg/L 0.50 pg/L 1.6 pg/L 1.0 pg/L 1.7 pg/L | All water samples in SDG G0D170492 |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|-------------------|---|--|--|
| EB-04152010-1-RZD | 1,2,3,4,6,7,8-HpCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 7.3 pg/L 1.3 pg/L 0.33 pg/L 2.2 pg/L 0.62 pg/L 6.8 pg/L | 7.3U pg/L 1.3U pg/L 0.33U pg/L 2.2U pg/L 0.62U pg/L 6.8U pg/L |

Samples EB-04152010-2-RZD (from SDG G0D200558) and EB-04152010-1-RZD were identified as equipment blanks. No polychlorinated dioxin/dibenzofuran contaminants were found in these blanks with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|--------------------|---------------|---|--|--------------------------------------|
| EB-04152010-2-RZD | 4/16/10 | 2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 1.6 pg/L 2.9 pg/L 1.4 pg/L 2.6 pg/L 2.3 pg/L 9.8 pg/L 11 pg/L 45 pg/L 48 pg/L 29 pg/L 70 pg/L 56 pg/L 13 pg/L 7.6 pg/L 180 pg/L 58 pg/L 450 pg/L | All soil samples in SDG G0D170492 |

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|--------------------|---------------|---|---|--------------------------------------|
| EB-04152010-1-RZD | 4/16/10 | 2,3,7,8-TCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.34 pg/L 0.41 pg/L 0.41 pg/L 7.3 pg/L 60 pg/L 0.19 pg/L 0.39 pg/L 1.3 pg/L 0.33 pg/L 0.63 pg/L 2.2 pg/L 0.62 pg/L 6.8 pg/L | All soil samples in SDG G0D170492 |

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

Sample FB-04072010-RZD (from SDG G0D090441) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---|---|--------------------------------------|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | All soil samples in SDG G0D170492 |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|---------------|--|---|---|---|--------|
| SSAL8-01-1BPC | ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD | 33 (40-135) 37 (40-135) 22 (40-135) | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|---------------|--|---|---|---|--------|
| SSAK8-02-1BPC | 2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D170492 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D170492 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D170492**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|---|--|--|--------|------------------------------------|
| G0D170492 | SSAL8-01-1BPC | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D170492 | SSAK8-02-1BPC | 2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) J (all detects) J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D170492 | EB-04152010-1-RZD SSAL8-01-1BPC SSAK8-02-1BPC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D170492 | EB-04152010-1-RZD SSAL8-01-1BPC SSAK8-02-1BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D170492**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|-------------------|---|--|--------|------|
| G0D170492 | EB-04152010-1-RZD | 1,2,3,4,6,7,8-HpCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 7.3U pg/L 1.3U pg/L 0.33U pg/L 2.2U pg/L 0.62U pg/L 6.8U pg/L | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG
G0D170492**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D170492**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 23265L21
 SDG #: G0D170492
 Laboratory: Test America

Stage 2B

Date: 4/16/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/16/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration NV | A | |
| V. | Blanks | TW | |
| VI. | Matrix spike/Matrix spike duplicates | TW | No sp/ass'd - no anal |
| VII. | Laboratory control samples | A | 10 S |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | TW | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | SN | |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | TW | EB=1 ZB04152010-2-R2D, FB04072010-1-R2D |

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

(FOD 200558)
 (FOD 092441)

Validated Samples:

| | | | | | | |
|----|---|----|-----------|----|--|----|
| 1 | EB-04152010- R2D XR2D W | 11 | 0112250MB | 21 | | 31 |
| 2 | SSAL8-01-1BPC S | 12 | 0112236MB | 22 | | 32 |
| 3 | SSAK8-02-1BPC S | 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

VALIDATION FINDINGS WORKSHEET
Field Blanks

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y/N N/A Were field blanks identified in this SDG?

Blank units: pg/L **Associated sample units:** pg/g

Sampling date: 4/16/10

Field blank type: (circle one) Field Blank / Rinsate / Other: EB Associated Samples: All Soils (75x)

| Compound | Blank ID | 5X | Sample Identification |
|----------|-------------------|--------|-----------------------|
| | EB-04152010-2-RZD | 5X | |
| A | 1.6 | 0.008 | |
| B | 2.9 | 0.0145 | |
| C | 1.4 | 0.007 | |
| D | 2.6 | 0.013 | |
| E | 2.3 | 0.0115 | |
| F | 9.8 | 0.049 | |
| G | 11 | 0.055 | |
| H | 45 | 0.225 | |
| I | 48 | 0.24 | |
| J | 29 | 0.145 | |
| K | 70 | 0.35 | |
| L | 56 | 0.28 | |
| M | 13 | 0.065 | |
| N | 7.6 | 0.038 | |
| O | 180 | 0.9 | |
| P | 58 | 0.29 | |
| Q | 450 | 2.25 | |
| 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".

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 16, 2010
LDC Report Date: June 9, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): GOD200427

Sample Identification

SSAK5-02-1BPC
SSAK6-01-1BPC
SSAK7-03-1BPC
SSAL7-01-1BPC
SSAI3-01-1BPC

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 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- 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. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|-------------------------------------|------------------------------------|------------------------------|
| 0112236MB | 4/22/10 | OCDD 1,2,3,4,6,7,8-HpCDF OCDF | 0.85 pg/g 0.64 pg/g 1.3 pg/g | All samples in SDG G0D200427 |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|---------------|-------------------------------------|-----------------------------------|--------------------------------------|
| SSAL7-01-1BPC | OCDD 1,2,3,4,6,7,8-HpCDF OCDF | 1.3 pg/g 0.91 pg/g 2.5 pg/g | 1.3U pg/g 0.91U pg/g 2.5U pg/g |

Samples EB-04152010-2-RZD (from SDG G0D200558) and EB-04152010-1-RZD (from SDG G0D170492) were identified as equipment blanks. No polychlorinated dioxin/dibenzofuran contaminants were found in these blanks with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|--------------------|---------------|---|--|------------------------------|
| EB-04152010-2-RZD | 4/16/10 | 2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 1.6 pg/L 2.9 pg/L 1.4 pg/L 2.6 pg/L 2.3 pg/L 9.8 pg/L 11 pg/L 45 pg/L 48 pg/L 29 pg/L 70 pg/L 56 pg/L 13 pg/L 7.6 pg/L 180 pg/L 58 pg/L 450 pg/L | All samples in SDG G0D200427 |
| EB-04152010-1-RZD | 4/16/10 | 2,3,7,8-TCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.34 pg/L 0.41 pg/L 0.41 pg/L 7.3 pg/L 60 pg/L 0.19 pg/L 0.39 pg/L 1.3 pg/L 0.33 pg/L 0.63 pg/L 2.2 pg/L 0.62 pg/L 6.8 pg/L | All samples in SDG G0D200427 |

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

Sample FB-04072010-RZD (from SDG G0D090441) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---|---|---------------------------------|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | All samples in SDG G0D200427 |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|---------------|--|---|---|---|--------|
| SSAK5-02-1BPC | ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD | 33 (40-135) 37 (40-135) 13 (40-135) | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P |
| SSAK6-01-1BPC | ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD | 25 (40-135) 26 (40-135) 16 (40-135) | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P |

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|---------------|--|---|---|--|--------|
| SSAK7-03-1BPC | ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD | 31 (40-135) 35 (40-135) 14 (40-135) | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P |
| SSAL7-01-1BPC | ¹³ C-OCDD | 33 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |
| SSAI3-01-1BPC | ¹³ C-OCDD | 17 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|---------------|---|--|---|---|--------|
| SSAK6-01-1BPC | 2,3,7,8-TCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P |
| SSAI3-01-1BPC | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P |
| SSAL7-01-1BPC | 2,3,7,8-TCDF | 2nd column confirmation was not performed for this compound. | This compound must be confirmed on the 2nd column per the method. | None | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D200427 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D200427 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D200427**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|---|---|---|--------|------------------------------------|
| G0D200427 | SSAK5-02-1BPC SSAK6-01-1BPC SSAK7-03-1BPC | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D200427 | SSAL7-01-1BPC SSAI3-01-1BPC | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D200427 | SSAK6-01-1BPC | 2,3,7,8-TCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D200427 | SSAI3-01-1BPC | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D200427 | SSAL7-01-1BPC | 2,3,7,8-TCDF | None | P | Project Quantitation Limit (o) |
| G0D200427 | SSAK5-02-1BPC SSAK6-01-1BPC SSAK7-03-1BPC SSAL7-01-1BPC SSAI3-01-1BPC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D200427 | SSAK5-02-1BPC SSAK6-01-1BPC SSAK7-03-1BPC SSAL7-01-1BPC SSAI3-01-1BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D200427**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|------------|---------------|-------------------------------------|--------------------------------------|---------------|-------------|
| G0D200427 | SSAL7-01-1BPC | OCDD 1,2,3,4,6,7,8-HpCDF OCDF | 1.3U pg/g 0.91U pg/g 2.5U pg/g | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG
G0D200427**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D200427**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265M21
 SDG #: G0D200427
 Laboratory: Test America

Date: 4/8/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/16/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ICV | A | |
| V. | Blanks | TW | |
| VI. | Matrix spike/Matrix spike duplicates | TW | No sp/ass'd - No Qual |
| VII. | Laboratory control samples | A | LCs |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | TW | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | SW | |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | SW | (FOD200558) FB-04072010-R2D (FOD090441), ZB-04152010-2-R2D ZB-04152010-1-R2D (FOD170492) |

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

Validated Samples:

| | | | | | | | |
|----|---------------|---|----|------------|----|--|----|
| 1 | SSAK5-02-1BPC | 5 | 11 | 0112236 MB | 21 | | 31 |
| 2 | SSAK6-01-1BPC | | 12 | | 22 | | 32 |
| 3 | SSAK7-03-1BPC | | 13 | | 23 | | 33 |
| 4 | SSAL7-01-1BPC | | 14 | | 24 | | 34 |
| 5 | SSAI3-01-1BPC | | 15 | | 25 | | 35 |
| 6 | | | 16 | | 26 | | 36 |
| 7 | | | 17 | | 27 | | 37 |
| 8 | | | 18 | | 28 | | 38 |
| 9 | | | 19 | | 29 | | 39 |
| 10 | | | 20 | | 30 | | 40 |

Notes: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

LDC #: 23265M21
 SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y/N N/A Were field blanks identified in this SDG?

Blank units: pg/L Associated sample units: pg/g

Sampling date: 4/16/10

Field blank type: (circle one) Field Blank / Rinsate / Other: ZB Associated Samples: All (>5x)

| Compound | Blank ID | 5X | Sample Identification | | | |
|----------|-------------------|--------|-----------------------|--|--|--|
| | FR-04152010-2-RZD | 5X | | | | |
| A | 1.6 | 0.008 | | | | |
| B | 2.9 | 0.0145 | | | | |
| C | 1.4 | 0.007 | | | | |
| D | 2.6 | 0.013 | | | | |
| E | 2.3 | 0.0115 | | | | |
| F | 9.8 | 0.049 | | | | |
| G | 11 | 0.055 | | | | |
| H | 45 | 0.225 | | | | |
| I | 48 | 0.24 | | | | |
| J | 29 | 0.145 | | | | |
| K | 70 | 0.35 | | | | |
| L | 56 | 0.28 | | | | |
| M | 13 | 0.065 | | | | |
| N | 7.6 | 0.038 | | | | |
| O | 180 | 0.9 | | | | |
| P | 58 | 0.29 | | | | |
| Q | 450 | 2.25 | | | | |
| 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 #: 23265 M2
 SDG #: 222222

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

Y N N/A Were the correct internal standard (IS), quantitation ions and relative response factors (RRF) used to quantitate the compound?
Y N N/A Compound quantitation and CRQLs were adjusted to reflect all sample dilutions and dry weight factors (if necessary).

| # | Date | Sample ID | Finding | Associated Samples | Qualifications |
|---|------|-----------|--|--------------------|--------------------|
| | | | <u>spds > calibration</u> | | |
| | | <u>2</u> | <u>H.L.O.P.A</u> | | <u>[Signature]</u> |
| | | | | | |
| | | <u>5</u> | <u>H.F.K.L.O.P.A</u> | | |
| | | | | | |
| | | <u>4</u> | <u>No e.s.t.s - Troof confirmation</u> | | <u>[Signature]</u> |
| | | | | | |
| | | <u>MA</u> | <u>ZNPO results (R-tag)</u> | <u>MA</u> | <u>[Signature]</u> |
| | | | | | |
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| | | | | | |
| | | | | | |

Comments: See sample calculation verification worksheet for recalculations

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 16, 2010
LDC Report Date: June 9, 2010
Matrix: Water
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0D200558

Sample Identification

EB-04152010-2-RZD

Introduction

This data review covers one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|---|------------------------------|
| 0112250MB | 4/22/10 | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 2.1 pg/L 8.4 pg/L 0.92 pg/L 0.52 pg/L 0.50 pg/L 1.6 pg/L 1.0 pg/L 1.7 pg/L | All samples in SDG G0D200558 |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|-------------------|-----------------------------|------------------------|------------------------------|
| EB-04152010-2-RZD | 1,2,3,4,6,7,8-HpCDD OCDD | 9.8 pg/L 11 pg/L | 9.8U pg/L 11U pg/L |

Sample EB-04152010-2-RZD was identified as an equipment blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|--------------------|---------------|---|--|-----------------------------------|
| EB-04152010-2-RZD | 4/16/10 | 2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 1.6 pg/L 2.9 pg/L 1.4 pg/L 2.6 pg/L 2.3 pg/L 9.8 pg/L 11 pg/L 45 pg/L 48 pg/L 29 pg/L 70 pg/L 56 pg/L 13 pg/L 7.6 pg/L 180 pg/L 58 pg/L 450 pg/L | No associated samples in this SDG |

VI. 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.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|-------------------|---------------------------------|-------------|-----------------|---|--------|
| EB-04152010-2-RZD | ¹³ C-1,2,3,7,8-PeCDD | 39 (40-135) | 1,2,3,7,8-PeCDD | J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D200558 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D200558 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D200558**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|-------------------|---------------------------------------|---|--------|---------------------------------|
| G0D200558 | EB-04152010-2-RZD | 1,2,3,7,8-PeCDD | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D200558 | EB-04152010-2-RZD | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D200558 | EB-04152010-2-RZD | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0D200558**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|-------------------|-----------------------------|------------------------------|--------|------|
| G0D200558 | EB-04152010-2-RZD | 1,2,3,4,6,7,8-HpCDD OCDD | 9.8U pg/L 11U pg/L | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG G0D200558**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265N21

SDG #: G0D200558

Laboratory: Test America

Date: 6/7/10

Page: 1 of 1

Reviewer: [Signature]

2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/16/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ICV | A | |
| V. | Blanks | TW | |
| VI. | Matrix spike/Matrix spike duplicates | N | |
| VII. | Laboratory control samples | A | LC9 |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | TW | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | S N | All EMPC results - JK(K) |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | TW | 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 | EB-04152010-2-RZD | N | 11 | 0112250 MB | 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDD |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

VALIDATION FINDINGS WORKSHEET
Field Blanks

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y/N N/A Were field blanks identified in this SDG?

Blank units: pg/L **Associated sample units:** pg/g

Sampling date: 4/16/10

Field blank type: (circle one) Field Blank / Rinsate / Other: EB Associated Samples: None

| Compound | Blank ID | 5X | Sample Identification |
|----------|-------------------|--------|-----------------------|
| | EB-04152010-2-R7D | 5X | |
| A | 1.6 | 0.008 | |
| B | 2.9 | 0.0145 | |
| C | 1.4 | 0.007 | |
| D | 2.6 | 0.013 | |
| E | 2.3 | 0.0115 | |
| F | 9.8 | 0.049 | |
| G | 11 | 0.055 | |
| H | 45 | 0.225 | |
| I | 48 | 0.24 | |
| J | 29 | 0.145 | |
| K | 70 | 0.35 | |
| L | 56 | 0.28 | |
| M | 13 | 0.065 | |
| N | 7.6 | 0.038 | |
| O | 180 | 0.9 | |
| P | 58 | 0.29 | |
| Q | 450 | 2.25 | |
| 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".

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 22, 2010
LDC Report Date: June 10, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B & 4
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0D240497

Sample Identification

SSAL3-04-1BPC
SSAL3-03-1BPC
SSAM2-01-3BPC**
SSAL3-04-1BPCMS
SSAL3-04-1BPCMSD
SSAM2-01-3BPCMS
SSAM2-01-3BPCMSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 7 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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 of the 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.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

The exact mass of 380.9760 of PFK was verified. The static resolving power was at least 10,000 (10% valley definition) for samples on which Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

The minimum S/N ratio for each target compound was greater than or equal to 2.5 and greater than or equal to 10 for each recovery and internal standard compound for samples on which Stage 4 review was performed. Raw data were not evaluated for the samples reviewed by Stage 2B criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|---|---|--------------------------------|
| 0123335MB | 5/3/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.085 pg/g 0.60 pg/g 0.086 pg/g 0.079 pg/g 0.14 pg/g | SSAM2-01-3BPC** |
| 0118247MB | 4/28/10 | 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.038 pg/g 0.026 pg/g 0.10 pg/g 0.28 pg/g 0.17 pg/g 0.24 pg/g 0.18 pg/g 0.31 pg/g 0.13 pg/g 0.15 pg/g 0.064 pg/g 0.19 pg/g 0.15 pg/g 0.23 pg/g | SSAL3-04-1BPC SSAL3-03-1BPC |

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

Samples FB-04072010-RZD (from SDG G0D090441) and FB-04132010-RIG2-RZE (from SDG G0D150582) were identified as field blanks. No polychlorinated dioxin/dibenzofuran contaminants were found in these blanks with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|----------------------|---------------|---|---|--------------------------------|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | SSAL3-04-1BPC SSAL3-03-1BPC |
| FB-04132010-RIG2-RZE | 4/13/10 | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.40 pg/L 0.65 pg/L 2.5 pg/L 0.66 pg/L 0.41 pg/L 0.53 pg/L 0.97 pg/L | SSAM2-01-3BPC** |

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

VI. 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, or LCS percent recoveries (%R) were within QC limits and no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|-----------------|--|---|--|--|--------|
| SSAL3-04-1BPC | ¹³ C-OCDD | 36 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |
| SSAM2-01-3BPC** | ¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,4,6,7,8-HpCDD | 36 (40-135) 33 (40-135) 39 (40-135) | 2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,4,6,7,8-HpCDD | J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

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.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|--------------------------------|----------|---|---|-----------------|--------|
| SSAL3-04-1BPC SSAL3-03-1BPC | OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) | P |

| Sample | Compound | Finding | Criteria | Flag | A or P |
|-----------------|--------------|---|---|-----------------|--------|
| SSAM2-01-3BPC** | 2,3,7,8-TCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D240497 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D240497 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

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

XII. System Performance

The system performance was acceptable for samples on which a Stage 4 review was performed. 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

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D240497**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|---|--|--|--------|------------------------------------|
| G0D240497 | SSAL3-04-1BPC | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D240497 | SSAM2-01-3BPC** | 2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,4,6,7,8-HpCDD | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D240497 | SSAL3-04-1BPC SSAL3-03-1BPC | OCDF | J (all detects) | P | Project Quantitation Limit (e) |
| G0D240497 | SSAM2-01-3BPC** | 2,3,7,8-TCDF | J (all detects) | P | Project Quantitation Limit (e) |
| G0D240497 | SSAL3-04-1BPC SSAL3-03-1BPC SSAM2-01-3BPC** | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D240497 | SSAL3-04-1BPC SSAL3-03-1BPC SSAM2-01-3BPC** | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D240497**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D240497**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 23265021
 SDG #: G0D240497
 Laboratory: Test America

Stage 2B/4

Date: 4/9/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/22/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ICV | A | |
| V. | Blanks | TW | |
| VI. | Matrix spike/Matrix spike duplicates | TW | |
| VII. | Laboratory control samples | A | LOS |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | TW | |
| X. | Target compound identifications | A | |
| XI. | Compound quantitation and CRQLs | SN | |
| XII. | System performance | A | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | TW | FB-0407=2010-R2D (G0D090441), FB-0413=2010-R1G2-R226G0D15 |

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

Validated Samples:

M 50.15

| | | | | | |
|----|------------------|----|-----------|----|----|
| 1 | SSAL3-04-1BPC | 11 | 0118247MB | 21 | 31 |
| 2 | SSAL3-03-1BPC | 12 | 0123335MB | 22 | 32 |
| 3 | SSAM2-01-3BPC ** | 13 | | 23 | 33 |
| 4 | SSAL3-04-1BPCMS | 14 | | 24 | 34 |
| 5 | SSAL3-04-1BPCMSD | 15 | | 25 | 35 |
| 6 | SSAM2-01-3BPCMS | 16 | | 26 | 36 |
| 7 | SSAM2-01-3BPCMSD | 17 | | 27 | 37 |
| 8 | | 18 | | 28 | 38 |
| 9 | | 19 | | 29 | 39 |
| 10 | | 20 | | 30 | 40 |

Notes: _____

VALIDATION FINDINGS CHECKLIST

Method: Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| Validation Area | Yes | No | NA | Findings/Comments |
|--|-------------------------------------|-------------------------------------|--------------------------|-------------------|
| I. Technical holding times | | | | |
| All technical holding times were met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Cooler temperature criteria was met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| II. GC/MS Instrument performance check | | | | |
| Was PFK exact mass 380.9760 verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the retention time windows established for all homologues? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomers $\leq 25\%$? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the static resolving power at least 10,000 (10% valley definition)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the mass resolution adequately check with PFK? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the presence of 1,2,8,9-TCDD and 1,3,4,6,8-PeCDF verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| III. Initial calibration | | | | |
| Was the initial calibration performed at 5 concentration levels? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent relative standard deviations (%RSD) $\leq 20\%$ for unlabeled standards and $\leq 30\%$ for labeled standards? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Did all calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the signal to noise ratio for each target compound ≥ 2.5 and for each recovery and internal standard ≥ 10 ? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| IV. Continuing calibration | | | | |
| Was a routine calibration performed at the beginning and end of each 12 hour period? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent differences (%D) $\leq 20\%$ for unlabeled standards and $\leq 30\%$ for labeled standards? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Did all routine calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| V. Blanks | | | | |
| Was a method blank associated with every sample in this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was a method blank performed for each matrix and concentration? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| VI. 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| VII. Laboratory control samples | | | | |
| Was an LCS analyzed for this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was an LCS analyzed per extraction batch? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

VALIDATION FINDINGS CHECKLIST

| | | | |
|---|-------------------------------------|--|--|
| VIII. Regional Quality Assurance and Quality Control | | | |
| Were performance evaluation (PE) samples performed? | <input checked="" type="checkbox"/> | | |
| Were the performance evaluation (PE) samples within the acceptance limits? | <input checked="" type="checkbox"/> | | |
| IX. Internal standards | | | |
| Were internal standard recoveries within the 40-135% criteria? | <input checked="" type="checkbox"/> | | |
| Was the minimum S/N ratio of all internal standard peaks ≥ 10 ? | <input checked="" type="checkbox"/> | | |
| X. Target compound identification | | | |
| For 2,3,7,8 substituted congeners with associated labeled standards, were the retention times of the two quantitation peaks within -1 to 3 sec. of the RT of the labeled standard? | <input checked="" type="checkbox"/> | | |
| For 2,3,7,8 substituted congeners without associated labeled standards, were the relative retention times of the two quantitation peaks within 0.005 time units of the RRT measured in the routine calibration? | <input checked="" type="checkbox"/> | | |
| For non-2,3,7,8 substituted congeners, were the retention times of the two quantitation peaks within RT established in the performance check solution? | <input checked="" type="checkbox"/> | | |
| Did compound spectra contain all characteristic ions listed in the table attached? | <input checked="" type="checkbox"/> | | |
| Was the Ion Abundance Ratio for the two quantitation ions within criteria? | <input checked="" type="checkbox"/> | | |
| Was the signal to noise ratio for each target compound and labeled standard ≥ 2.5 ? | <input checked="" type="checkbox"/> | | |
| Does the maximum intensity of each specified characteristic ion coincide within ± 2 seconds (includes labeled standards)? | <input checked="" type="checkbox"/> | | |
| For PCDF identification, was any signal ($S/N \geq 2.5$, at \pm seconds RT) detected in the corresponding PCDPE channel? | <input checked="" type="checkbox"/> | | |
| Was an acceptable lock mass recorded and monitored? | <input checked="" type="checkbox"/> | | |
| XI. Compound quantitation/CRQLs | | | |
| Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound? | <input checked="" type="checkbox"/> | | |
| Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation? | <input checked="" type="checkbox"/> | | |
| XII. System performance | | | |
| System performance was found to be acceptable. | <input checked="" type="checkbox"/> | | |
| XIII. Overall assessment of data | | | |
| Overall assessment of data was found to be acceptable. | <input checked="" type="checkbox"/> | | |
| XIV. Field duplicates | | | |
| Field duplicate pairs were identified in this SDG. | <input checked="" type="checkbox"/> | | |
| Target compounds were detected in the field duplicates. | <input checked="" type="checkbox"/> | | |
| XV. Field blanks | | | |
| Field blanks were identified in this SDG. | <input checked="" type="checkbox"/> | | |
| Target compounds were detected in the field blanks. | <input checked="" type="checkbox"/> | | |

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

VALIDATION FINDINGS WORKSHEET
 Matrix Spike/Matrix Spike Duplicates

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

- N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.
- N N/A Was a MS/MSD analyzed every 20 samples of each matrix?
- 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 |
|---|------|-----------|----------|----------------|-----------------|--------------|--------------------|-------------------|
| | | 4/5 | H | 217 (79-137) | 0 (79-137) | () () | 1 | No Qual |
| | | | O | 44 (81-137) | 59 (81-137) | () () | | |
| | | | R | 84 (75-141) | 117 (75-141) | () () | | |
| | | | | () () | () () | () () | | Some > 4x SA |
| | | | | () () | () () | () () | | and LCS in |
| | 6/7 | | B | () () | 149 (79-134) | 35 (≤29) | 3 | No Qual |
| | | | D | () () | 152 (73-147) | 40 (≤36) | | |
| | | | E | 71 (80-143) | () () | 34 (≤31) | | |
| | | | F | 73 (86-134) | 231 (86-134) | 73 (≤28) | | |
| | | | G | () () | 201 (80-137) | 58 (≤32) | | |
| | | | H | 0 (79-137) | 0 (79-137) | () () | | |
| | | | I | 87 (81-134) | () () | 51 (≤27) | | |
| | | | J | 0.0 (76-132) | 26 (76-132) | () () | | |
| | | | K | 257 (72-140) | () () | 66 (≤32) | | |
| | | | L | () () | 162 (63-152) | 45 (≤38) | | |
| | | | N | 43 (72-152) | 55 (82-152) | () () | | |
| | | | O | 35 (81-137) | 658 (81-137) | 128 (≤33) | | |
| | | | P | 75 (79-139) | 362 (79-139) | 96 (≤35) | | |
| | | | Q | 0 (75-141) | 1170 (75-141) | 123 (≤45) | | |
| | | | A | () () | 0 (77-130) | 200 (≤30) | | (MS) LCS in |
| | | | | () () | () () | () () | | LCS in |
| | | | | () () | () () | () () | | Some conc > 4x SA |

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

$RRF = (A_x)(C_s)/(A_s)(C_x)$
 average RRF = sum of the RRFs/number of standards
 $\%RSD = 100 * (S/X)$
 A_x = Area of compound,
 C_x = Concentration of compound,
 S = Standard deviation of the RRFs,
 A_s = Area of associated internal standard
 C_s = Concentration of internal standard
 X = Mean of the RRFs

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Reported | | Recalculated | | Reported | | Recalculated | |
|---|----------------|------------------|--|-----------------------|-----------------------|--------------|-----------------------|--------------|--------------|--------------|--|
| | | | | Average RRF (Initial) | Average RRF (Initial) | RRF (CS std) | Average RRF (Initial) | RRF (CS std) | RRF (CS std) | %RSD | |
| 1 | 1EATZ (305) | 3/1/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.92135 | 0.92135 | 0.94963 | 0.94963 | 6.1085 | 6.1085 | 6.109 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.03870 | 1.03870 | 1.04720 | 1.04720 | 4.89709 | 4.897 | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.09904 | 1.09904 | 1.11730 | 1.11730 | 4.93827 | 4.938 | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.99684 | 0.99684 | 1.05541 | 1.05541 | 5.31525 | 5.315 | | |
| | | | OCDF (¹³ C-OCDD) | 1.26224 | 1.26224 | 1.32988 | 1.32988 | 9.39998 | 9.400 | | |
| 2 | 1EATZ | 4/21/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 1.088 | 1.10 | 1.10 | 1.29 | 1.29 | 1.20 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | | | | |
| 3 | | | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | | | | | | | | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | | | | |

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.

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Difference = $100 * (\text{ave. RRF} - \text{RRF}) / \text{ave. RRF}$ Where: ave. RRF = initial calibration average RRF
 RRF = $(A_x)(C_u) / (A_u)(C_x)$ RRF = continuing calibration RRF
 A_x = Area of compound, A_u = Area of associated internal standard
 C_x = Concentration of compound, C_u = Concentration of internal standard

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Average RRF (Initial) | Reported | | Recalculated | | Recalculated %D |
|---|-------------|------------------|--|-----------------------|----------|------|--------------|------|-----------------|
| | | | | | RRF (CC) | %D | RRF (CC) | %D | |
| 1 | 1A-MX10375 | 5/15/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.92135 | 1.00105 | 8.7 | 1.00105 | 8.7 | |
| | 25 | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.03870 | 1.13915 | 9.7 | 1.13915 | 9.7 | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.09904 | 1.17849 | 7.2 | 1.17849 | 7.2 | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.99682 | 1.10758 | 11.1 | 1.10758 | 11.1 | |
| | | | OCDF (¹³ C-OCDD) | 1.26224 | 1.57414 | 20.0 | 1.57414 | 20.0 | |
| 2 | 1A-MX10572 | 5/16/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 0.97 | 10.5 | 0.97 | 10.5 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | | |
| 3 | | | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | | | | | | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | | |

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

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates Results Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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 = $100 * (SSR - SR) / SA$

Where: SSR = Spiked sample result, SR = Sample result
SA = Spike added

RPD = $|MSR - MSDR| * 2 / (MSR + MSDR)$

MSR = Matrix spike percent recovery MSDR = Matrix spike duplicate percent recovery

MS/MSD samples: 6/7

| Compound | Spike Added (ppg) | | Sample Concentration (ppg) | Spiked Sample Concentration (ppg) | | Matrix Spike Percent Recovery | | Matrix Spike Duplicate Percent Recovery | | Reported RPD | Recalculated RPD |
|---------------------|-------------------|------|----------------------------|-----------------------------------|------|-------------------------------|--------|---|--------|--------------|------------------|
| | MS | MSD | | MS | MSD | Reported | Recalc | Reported | Recalc | | |
| 2,3,7,8-TCDD | 21.7 | 19.6 | 6.7 | 30.3 | 0 | 109 | 109 | 0 | 0 | 200 | 200 |
| 1,2,3,7,8-PeCDD | 108 | 97.8 | 13 | 126 | 157 | 104 | 105 | 149 | 147 | 35 | 22 |
| 1,2,3,4,7,8-HxCDD | ↓ | ↓ | 5.4 | 81.8 | 75.1 | 71 | 71 | 72 | 72 | 4.9 | 8.5 |
| 1,2,3,4,7,8,9-HpCDF | 217 | 196 | 9.6 | 177 | 438 | 75 | 75 | 362 | 350 | 96 | 85 |
| OCDF | | | 1000 | 754 | 5170 | 0 | 0 | 1170 | 1107 | 0 | 124 |
| | | | | | | | | | | | |
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| | | | | | | | | | | | |
| | | | | | | | | | | | |

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

lab used 40R to calculate RPD due to different spike amount.

METHOD: GC/MS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Recovery = $100 * SSC/SA$

Where: SSC = Spiked sample concentration
 SA = Spike added

RPD = $100 * (LCS - LCSD) / (LCS + LCSD)$

LCS = Laboratory control sample percent recovery

LCSD = Laboratory control sample duplicate percent recovery

LCS ID: 0/23335

| Compound | Spike Added (PS/g) | | Spiked Sample Concentration (PS/g) | | LCS | | LCSD | | Percent Recovery | | Percent Recovery | | RPD | |
|---------------------|--------------------|------|------------------------------------|------|----------|--------|----------|--------|------------------|--------|------------------|--------|----------|--------|
| | LCS | LCSD | LCS | LCSD | Reported | Recalc | Reported | Recalc | Reported | Recalc | Reported | Recalc | Reported | Recalc |
| 2,3,7,8-TCDD | 200 | NA | 24.3 | NA | 121 | 121 | | | | | | | | |
| 1,2,3,7,8-PeCDD | 100 | | 114 | | 114 | 114 | | | | | | | | |
| 1,2,3,4,7,8-HxCDD | | | 115 | | 115 | 115 | | | | | | | | |
| 1,2,3,4,7,8,9-HpCDF | | | 122 | | 122 | 122 | | | | | | | | |
| OCDF | 200 | | 256 | | 128 | 128 | | | | | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
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| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |

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

| Descriptor | Accurate mass ^(a) | Ion ID | Elemental Composition | Analyte | Descriptor | Accurate Mass ^(a) | Ion ID | Elemental Composition | Analyte | | |
|------------|------------------------------|----------|---|--|------------|------------------------------|--------|---|-----------|--|------|
| 1 | 303.9016 | M | C ₁₂ H ₃ ³⁵ Cl ₃ O | TCDF | 4 | 407.7818 | M+2 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO | HpCDF | | |
| | 305.8987 | M+2 | C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO | TCDF | | 409.7788 | M+4 | C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ Cl ₂ O | HpCDF | | |
| | 315.9419 | M | ¹³ C ₁₂ H ₄ ³⁵ Cl ₃ O | TCDF (S) | | 417.8250 | M | ¹³ C ₁₂ H ₄ ³⁵ Cl ₃ O | HpCDF (S) | | |
| | 317.9389 | M+2 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO | TCDF (S) | | 419.8220 | M+2 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO | HpCDF | | |
| | 319.8965 | M | C ₁₂ H ₄ ³⁵ Cl ₄ O ₂ | TCDD | | 423.7767 | M+2 | C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO ₂ | HpCDD | | |
| | 321.8936 | M+2 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂ | TCDD | | 425.7737 | M+4 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | HpCDD | | |
| | 331.9368 | M | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ O ₂ | TCDD (S) | | 435.8169 | M+2 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂ | HpCDD (S) | | |
| | 333.9338 | M+2 | ¹³ C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO ₂ | TCDD (S) | | 437.8140 | M+4 | ¹³ C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO ₂ | HpCDD (S) | | |
| | 375.8364 | M+2 | C ₁₂ H ₄ ³⁵ Cl ₅ ³⁷ ClO | HxCDFE | | 479.7165 | M+4 | C ₁₂ H ₄ ³⁵ Cl ₅ ³⁷ Cl ₂ O | NCDFE | | |
| | [354.9792] | LOCK | C ₉ F ₁₃ | PFK | | [430.9728] | LOCK | C ₉ F ₁₇ | PFK | | |
| | 2 | 339.8597 | M+2 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO | | PeCDF | 5 | 441.7428 | M+2 | C ₁₂ ³⁵ Cl ₇ ³⁷ ClO | OCDF |
| | | 341.8567 | M+4 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O | | PeCDF | | 443.7399 | M+4 | C ₁₂ ³⁵ Cl ₆ ³⁷ Cl ₂ O | OCDF |
| | | 351.9000 | M+2 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO | | PeCDF (S) | | 457.7377 | M+2 | C ₁₂ ³⁵ Cl ₇ ³⁷ ClO ₂ | OCDD |
| | | 353.8970 | M+4 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O | | PeCDF (S) | | 459.7348 | M+4 | C ₁₂ ³⁵ Cl ₆ ³⁷ Cl ₂ O ₂ | OCDD |
| 355.8546 | | M+2 | C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO ₂ | PeCDD | 469.7780 | M+2 | | ¹³ C ₁₂ ³⁵ Cl ₇ ³⁷ ClO ₂ | OCDD (S) | | |
| 357.8516 | | M+4 | C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | PeCDD | 471.7750 | M+4 | | ¹³ C ₁₂ ³⁵ Cl ₆ ³⁷ Cl ₂ O ₂ | OCDD (S) | | |
| 367.8949 | | M+2 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂ | PeCDD (S) | 513.6775 | M+4 | | C ₁₂ ³⁵ Cl ₈ ³⁷ Cl ₂ O | DCDFE | | |
| 369.8919 | | M+4 | ¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | PeCDD (S) | [422.9278] | LOCK | | C ₁₀ F ₁₇ | PFK | | |
| 409.7974 | | M+2 | C ₁₂ H ₃ ³⁵ Cl ₉ ³⁷ ClO | HpCDPE | | | | | | | |
| [354.9792] | | LOCK | C ₉ F ₁₃ | PFK | | | | | | | |
| 3 | | 373.8208 | M+2 | C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO | HxCDF | | | | | | |
| | | 375.8178 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ Cl ₂ O | HxCDF | | | | | | |
| | | 383.8639 | M | ¹³ C ₁₂ H ₂ ³⁵ Cl ₅ O | HxCDF (S) | | | | | | |
| | | 385.8610 | M+2 | ¹³ C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO | HxCDF (S) | | | | | | |
| | 389.8156 | M+2 | C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO ₂ | HxCDD | | | | | | | |
| | 391.8127 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ Cl ₂ O ₂ | HxCDD | | | | | | | |
| | 401.8559 | M+2 | ¹³ C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO ₂ | HxCDD (S) | | | | | | | |
| | 403.8529 | M+4 | ¹³ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ Cl ₂ O ₂ | HxCDD (S) | | | | | | | |
| | 445.7555 | M+4 | C ₁₂ H ₂ ³⁵ Cl ₉ ³⁷ Cl ₂ O | OCDFE | | | | | | | |
| | [430.9728] | LOCK | C ₉ F ₁₇ | PFK | | | | | | | |

(a) The following nuclidic masses were used:

H = 1.007825
 C = 12.000000
¹³C = 13.003355
 F = 18.9984
 O = 15.994915
³⁵Cl = 34.968853
³⁷Cl = 36.965903

S = internal/recovery standard

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 23, 2010
LDC Report Date: June 9, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.
Sample Delivery Group (SDG): G0D270515

Sample Identification

SSAI3-06-1BPC
SSAJ2-01-1BPC

Introduction

This data review covers 2 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- 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. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|--|------------------------------|
| 0123335MB | 5/3/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.085 pg/g 0.60 pg/g 0.086 pg/g 0.079 pg/g 0.14 pg/g | All samples in SDG G0D270515 |

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

Sample FB-04072010-RZD (from SDG G0D090441) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---|---|---------------------------------|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | All samples in SDG G0D270515 |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|---------------|--|---|-------------------|---|--------|
| SSAI3-06-1BPC | ¹³ C-2,3,7,8-TCDF ¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDF ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,4,7,8-HxCDF ¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD | 24 (40-135) 20 (40-135) 22 (40-135) 19 (40-135) 20 (40-135) 18 (40-135) 20 (40-135) 20 (40-135) 18 (40-135) | All TCL compounds | J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|---------------|----------------------|---|---|------------------------------------|--------|
| SSAJ2-01-1BPC | 2,3,7,8-TCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D270515 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D270515 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D270515**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|--------------------------------|--|---|--------|------------------------------------|
| G0D270515 | SSAI3-06-1BPC | All TCL compounds | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D270515 | SSAJ2-01-1BPC | 2,3,7,8-TCDF OCDF | J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D270515 | SSAI3-06-1BPC SSAJ2-01-1BPC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D270515 | SSAI3-06-1BPC SSAJ2-01-1BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D270515**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D270515**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265P21
 SDG #: G0D270515
 Laboratory: Test America

Date: 6/7/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/23/10 |
| II. | HRGC/HRMS Instrument performance check | A |
| III. | Initial calibration | A |
| IV. | Routine calibration/ICV | A |
| V. | Blanks | NW |
| VI. | Matrix spike/Matrix spike duplicates | NW No spl ass'd - No Anal |
| VII. | Laboratory control samples | A CES |
| VIII. | Regional quality assurance and quality control | N |
| IX. | Internal standards | NW |
| X. | Target compound identifications | N |
| XI. | Compound quantitation and CRQLs | N |
| XII. | System performance | N |
| XIII. | Overall assessment of data | A |
| XIV. | Field duplicates | N |
| XV. | Field blanks | NW FB-04072010-R2D (G0D090441) |

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

Validated Samples:

| | | | | | | |
|----|---------------|---|----|------------|----|----|
| 1 | SSAI3-06-1BPC | 5 | 11 | 0123375MAB | 21 | 31 |
| 2 | SSAJ2-01-1BPC | ✓ | 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 23, 2010
LDC Report Date: June 9, 2010
Matrix: Water
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.
Sample Delivery Group (SDG): G0D270522

Sample Identification

EB-04232010-RZE

Introduction

This data review covers one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds with the following exceptions:

| Date | Compound | %D | Associated Samples | Affected Compound | Flag | A or P |
|---------|-------------------|------|--------------------|-------------------|------------------|--------|
| 5/16/10 | 1,2,3,4,7,8-HxCDD | 20.1 | 0120219MB | 1,2,3,4,7,8-HxCDD | J+ (all detects) | P |

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|---|------------------------------|
| 0120219MB | 4/30/10 | 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.65 pg/L 0.82 pg/L 1.9 pg/L 6.8 pg/L 0.67 pg/L 1.1 pg/L 2.8 pg/L 0.71 pg/L 0.89 pg/L 0.99 pg/L 0.34 pg/L 2.7 pg/L 3.8 pg/L | All samples in SDG G0D270522 |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|-----------------|--|--|--|
| EB-04232010-RZE | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 2.7 pg/L 21 pg/L 5.1 pg/L 2.0 pg/L 2.0 pg/L 7.3 pg/L 3.0 pg/L 16 pg/L | 2.7U pg/L 21U pg/L 5.1U pg/L 2.0U pg/L 2.0U pg/L 7.3U pg/L 3.0U pg/L 16U pg/L |

Sample EB-04232010-RZE was identified as an equipment blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|--------------------|---------------|---|--|-----------------------------------|
| EB-04232010-RZE | 4/23/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 2.7 pg/L 21 pg/L 3.8 pg/L 1.7 pg/L 5.1 pg/L 2.0 pg/L 2.0 pg/L 7.3 pg/L 3.0 pg/L 16 pg/L | No associated samples in this SDG |

VI. 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.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits.

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D270522 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D270522 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D270522**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|-----------------|---------------------------------------|------------------|--------|---------------------------------|
| G0D270522 | EB-04232010-RZE | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D270522 | EB-04232010-RZE | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0D270522**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|-----------------|--|--|--------|------|
| G0D270522 | EB-04232010-RZE | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 2.7U pg/L 21U pg/L 5.1U pg/L 2.0U pg/L 2.0U pg/L 7.3U pg/L 3.0U pg/L 16U pg/L | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG G0D270522**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265Q21
 SDG #: G0D270522
 Laboratory: Test America

Date: 4/7/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/23/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/W | W | |
| V. | Blanks | W | |
| VI. | Matrix spike/Matrix spike duplicates | N | |
| VII. | Laboratory control samples | A | LCG |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | A | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | S, N | All 2MPE results (2/10/09) - JK(R) |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | W | EB=1 |

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

Validated Samples:

| | | | | | | |
|----|-----------------|---|----|-----------|----|----|
| 1 | EB-04232010-RZE | W | 11 | 0/20219MB | 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 23, 2010
LDC Report Date: June 9, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.
Sample Delivery Group (SDG): G0D270529

Sample Identification

SSAI3-05-3BPC

Introduction

This data review covers one soil sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- 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. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|--|------------------------------|
| 0123335MB | 5/3/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.085 pg/g 0.60 pg/g 0.086 pg/g 0.079 pg/g 0.14 pg/g | All samples in SDG G0D270529 |

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

Sample FB-04072010-RZD (from SDG G0D090441) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---------------------|---------------|---------------------------------|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD | 0.89 pg/L | All samples in SDG G0D270529 |
| | | 1,2,3,7,8,9-HxCDD | 1.5 pg/L | |
| | | 1,2,3,4,6,7,8-HpCDD | 2.2 pg/L | |
| | | OCDD | 8.3 pg/L | |
| | | 1,2,3,4,7,8-HxCDF | 1.4 pg/L | |
| | | 1,2,3,6,7,8-HxCDF | 1.6 pg/L | |
| | | 2,3,4,6,7,8-HxCDF | 1.5 pg/L | |
| | | 1,2,3,7,8,9-HxCDF | 1.6 pg/L | |
| | | 1,2,3,4,6,7,8-HpCDF | 1.3 pg/L | |
| | | 1,2,3,4,7,8,9-HpCDF | 1.4 pg/L | |
| | | OCDF | 4.1 pg/L | |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits.

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|---------------|--------------|---|---|-----------------|--------|
| SSAI3-05-3BPC | 2,3,7,8-TCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D270529 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D270529 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D270529**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|------------|---------------|---------------------------------------|------------------|---------------|---------------------------------|
| G0D270529 | SSAI3-05-3BPC | 2,3,7,8-TCDF | J (all detects) | P | Project Quantitation Limit (e) |
| G0D270529 | SSAI3-05-3BPC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D270529 | SSAI3-05-3BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0D270529**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D270529**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265R21
 SDG #: G0D270529
 Laboratory: Test America

Date: 4/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/23/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/TQ | A | |
| V. | Blanks | TW | |
| VI. | Matrix spike/Matrix spike duplicates | SN | No sp/ass'd - No eval |
| VII. | Laboratory control samples | A | LC9 |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | A | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | SN | |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | TW | FB-040(2010-R2D(G0D 90441)) |

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

Validated Samples:

| | | | | | | | | |
|----|---------------|---|----|-----------|----|--|----|--|
| 1 | SSAI3-05-3BPC | 5 | 11 | 0123335MB | 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDD |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

LDC #: 232652
 SDG #: 2110001

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

Page: 1 of 9
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

Y N (N/A)
Y N (N/A)
 Were the correct internal standard (IS), quantitation ions and relative response factors (RRF) used to quantitate the compound?
 Compound quantitation and CRQLs were adjusted to reflect all sample dilutions and dry weight factors (if necessary).

| # | Date | Sample ID | Finding | Associated Samples | Qualifications |
|---|------|-----------|---------------------------|--------------------|----------------|
| | | 1 | H > calib range | 1 | ✓ (K) / P (e) |
| | | | | | |
| | | | | | |
| | | | | | |
| | | MU | ZMPC results (cf flag) | MU | ✓ (K) |
| | | | | | |
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Comments: See sample calculation verification worksheet for recalculations

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 26, 2010
LDC Report Date: June 9, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.
Sample Delivery Group (SDG): G0D270573

Sample Identification

SSAI3-04-1BPC

Introduction

This data review covers one soil sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|--|------------------------------|
| 0123335MB | 5/3/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.085 pg/g 0.60 pg/g 0.086 pg/g 0.079 pg/g 0.14 pg/g | All samples in SDG G0D270573 |

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

Sample EB-04262010-1-RZD (from SDG GOD280571) was identified as an equipment blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|--------------------|---------------|--|--|---------------------------------|
| EB-04262010-1-RZD | 4/26/10 | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 2.1 pg/L 6.8 pg/L 7.6 pg/L 4.5 pg/L 1.3 pg/L 12 pg/L 5.3 pg/L 25 pg/L | All samples in SDG GOD270573 |

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

Sample FB-04072010-RZD (from SDG GOD090441) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---|---|---------------------------------|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | All samples in SDG GOD270573 |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits.

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D270573 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D270573 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D270573**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|------------|---------------|---------------------------------------|------------------|---------------|---------------------------------|
| G0D270573 | SSAI3-04-1BPC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D270573 | SSAI3-04-1BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0D270573**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D270573**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265S21
 SDG #: G0D270573
 Laboratory: Test America

Date: 4/7/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/26/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ISV | A | |
| V. | Blanks | SW | |
| VI. | Matrix spike/Matrix spike duplicates | SW | No sp/ass'd - No dual |
| VII. | Laboratory control samples | A | LCS |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | A | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | SW | All ZMPC results (2/10/09) - JK (K) |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | SW | EB-04262904-1R2D(40D280571), FB-04072010R2D (40D090441) |

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

Validated Samples:

| | | | | | | | |
|----|---------------|---|----|------------|----|--|----|
| 1 | SSAI3-04-1BPC | S | 11 | 01233351XB | 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDD |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: April 26, 2010

LDC Report Date: June 9, 2010

Matrix: Soil

Parameters: Dioxins/Dibenzofurans

Validation Level: Stage 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0D270574

Sample Identification

SSAJ2-02-3BPC

Introduction

This data review covers one soil sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- 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. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

The exact mass of 380.9760 of PFK was verified. The static resolving power was at least 10,000 (10% valley definition).

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

The minimum S/N ratio for each target compound was greater than or equal to 2.5 and greater than or equal to 10 for each recovery and internal standard compound for samples.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds with the following exceptions:

| Date | Compound | %D | Associated Samples | Affected Compound | Flag | A or P |
|---------|-------------------------------------|------|--------------------|---------------------|------------------|--------|
| 5/16/10 | ¹³ C-1,2,3,4,6,7,8-HpCDD | 38.9 | SSAJ2-02-3BPC | 1,2,3,4,6,7,8-HpCDD | J+ (all detects) | P |

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|--|---------------------------------|
| 0123335MB | 5/3/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.085 pg/g 0.60 pg/g 0.086 pg/g 0.079 pg/g 0.14 pg/g | All samples in SDG G0D270574 |

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

Sample EB-04262010-1-RZD (from SDG G0D280571) was identified as an equipment blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|--------------------|---------------|--|--|---------------------------------|
| EB-04262010-1-RZD | 4/26/10 | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 2.1 pg/L 6.8 pg/L 7.6 pg/L 4.5 pg/L 1.3 pg/L 12 pg/L 5.3 pg/L 25 pg/L | All samples in SDG G0D270574 |

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

Sample FB-04072010-RZD (from SDG G0D090441) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---|---|---------------------------------|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | All samples in SDG G0D270574 |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits.

X. Target Compound Identifications

All target compound identifications were within validation criteria.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|---------------|---|---|---|---|--------|
| SSAJ2-02-3BPC | 2,3,7,8-TCDF 1,2,3,4,6,7,8-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D270574 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D270574 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

XII. System Performance

The system performance was acceptable.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D270574**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|---------------|---|---|--------|-------------------------------------|
| G0D270574 | SSAJ2-02-3BPC | 1,2,3,4,6,7,8-HpCDD | J+ (all detects) | P | Routine calibration (%D) (c) |
| G0D270574 | SSAJ2-02-3BPC | 2,3,7,8-TCDF 1,2,3,4,6,7,8-HpCDF OCDF | J (all detects) J (all detects) J (all detects) | P | Compound quantitation and CRQLs (e) |
| G0D270574 | SSAJ2-02-3BPC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D270574 | SSAJ2-02-3BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0D270574**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG G0D270574**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D270574**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 23265T21
 SDG #: G0D270574
 Laboratory: Test America

Stage 2B4

Date: 6/9/10
 Page: 6 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/26/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ IX | SW | |
| V. | Blanks | SW | |
| VI. | Matrix spike/Matrix spike duplicates | SW | No sp/ass'd - No anal |
| VII. | Laboratory control samples | A | LES |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | SWA | |
| X. | Target compound identifications | A | |
| XI. | Compound quantitation and CRQLs | SW | |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | SW | FB-04072010-R2D(40D090-41), 2B-04262010-1-R2D(40D090-80) |

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

Validated Samples:

| | | | | | | | |
|----|---------------|---|----|------------|----|--|----|
| 1 | SSAJ2-02-3BPC | S | 11 | 0123375 MB | 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: _____

VALIDATION FINDINGS CHECKLIST

Method: Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| Validation Area | Yes | No | NA | Findings/Comments |
|--|-------------------------------------|-------------------------------------|--------------------------|-------------------|
| I. Technical holding times | | | | |
| All technical holding times were met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Cooler temperature criteria was met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| II. GC/MS Instrument performance check | | | | |
| Was PFK exact mass 380.9760 verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the retention time windows established for all homologues? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomers $\leq 25\%$? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the static resolving power at least 10,000 (10% valley definition)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the mass resolution adequately check with PFK? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the presence of 1,2,8,9-TCDD and 1,3,4,6,8-PeCDF verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| III. Initial calibration | | | | |
| Was the initial calibration performed at 5 concentration levels? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent relative standard deviations (%RSD) $\leq 20\%$ for unlabeled standards and $\leq 30\%$ for labeled standards? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Did all calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the signal to noise ratio for each target compound ≥ 2.5 and for each recovery and internal standard > 10 ? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| IV. Continuing calibration | | | | |
| Was a routine calibration performed at the beginning and end of each 12 hour period? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent differences (%D) $\leq 20\%$ for unlabeled standards and $\leq 30\%$ for labeled standards? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| Did all routine calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| V. Blanks | | | | |
| Was a method blank associated with every sample in this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was a method blank performed for each matrix and concentration? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| VI. 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| VII. Laboratory control samples | | | | |
| Was an LCS analyzed for this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was an LCS analyzed per extraction batch? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

VALIDATION FINDINGS CHECKLIST

| | | | |
|---|-------------------------------------|--|--|
| VIII. Regional Quality Assurance and Quality Control | | | |
| Were performance evaluation (PE) samples performed? | <input checked="" type="checkbox"/> | | |
| Were the performance evaluation (PE) samples within the acceptance limits? | <input checked="" type="checkbox"/> | | |
| IX. Internal standards | | | |
| Were internal standard recoveries within the 40-135% criteria? | <input checked="" type="checkbox"/> | | |
| Was the minimum S/N ratio of all internal standard peaks ≥ 10 ? | <input checked="" type="checkbox"/> | | |
| X. Target compound identification | | | |
| For 2,3,7,8 substituted congeners with associated labeled standards, were the retention times of the two quantitation peaks within -1 to 3 sec. of the RT of the labeled standard? | <input checked="" type="checkbox"/> | | |
| For 2,3,7,8 substituted congeners without associated labeled standards, were the relative retention times of the two quantitation peaks within 0.005 time units of the RRT measured in the routine calibration? | <input checked="" type="checkbox"/> | | |
| For non-2,3,7,8 substituted congeners, were the retention times of the two quantitation peaks within RT established in the performance check solution? | <input checked="" type="checkbox"/> | | |
| Did compound spectra contain all characteristic ions listed in the table attached? | <input checked="" type="checkbox"/> | | |
| Was the Ion Abundance Ratio for the two quantitation ions within criteria? | <input checked="" type="checkbox"/> | | |
| Was the signal to noise ratio for each target compound and labeled standard ≥ 2.5 ? | <input checked="" type="checkbox"/> | | |
| Does the maximum intensity of each specified characteristic ion coincide within ± 2 seconds (includes labeled standards)? | <input checked="" type="checkbox"/> | | |
| For PCDF identification, was any signal ($S/N \geq 2.5$, at \pm seconds RT) detected in the corresponding PCDPE channel? | <input checked="" type="checkbox"/> | | |
| Was an acceptable lock mass recorded and monitored? | <input checked="" type="checkbox"/> | | |
| XI. Compound quantitation/CRQLs | | | |
| Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound? | <input checked="" type="checkbox"/> | | |
| Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation? | <input checked="" type="checkbox"/> | | |
| XII. System performance | | | |
| System performance was found to be acceptable. | <input checked="" type="checkbox"/> | | |
| XIII. Overall assessment of data | | | |
| Overall assessment of data was found to be acceptable. | <input checked="" type="checkbox"/> | | |
| XIV. Field duplicates | | | |
| Field duplicate pairs were identified in this SDG. | <input checked="" type="checkbox"/> | | |
| Target compounds were detected in the field duplicates. | <input checked="" type="checkbox"/> | | |
| XV. Field blanks | | | |
| Field blanks were identified in this SDG. | <input checked="" type="checkbox"/> | | |
| Target compounds were detected in the field blanks. | <input checked="" type="checkbox"/> | | |

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

VALIDATION FINDINGS WORKSHEET
Compound Quantitation and Reported CRQLs

LDC #: 230621
 SDG #: SLC0004

Page: 1 of 9
 Reviewer: _____
 2nd Reviewer: _____

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

Y N N/A Were the correct internal standard (IS), quantitation ions and relative response factors (RRF) used to quantitate the compound?
Y N N/A Compound quantitation and CRQLs were adjusted to reflect all sample dilutions and dry weight factors (if necessary).

| # | Date | Sample ID | Finding | Associated Samples | Qualifications |
|---|------|-----------|----------------------|--------------------|----------------|
| | | 1 | H.O. & > calib curve | | JK/P(e) |
| | | all | ZPC results | all | JK (K) |
| | | | | | |
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Comments: See sample calculation verification worksheet for recalculations

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

$RRF = (A_x/C_x)/(A_s/C_s)$
 average RRF = sum of the RRFs/number of standards
 $\%RSD = 100 * (S/X)$
 A_x = Area of compound,
 C_x = Concentration of compound,
 S = Standard deviation of the RRFs,
 X = Mean of the RRFs
 A_s = Area of associated internal standard
 C_s = Concentration of internal standard
 X = Mean of the RRFs

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Reported | | Recalculated | | Reported | | Recalculated | | |
|---|----------------|------------------|--|-----------------------|------------|-----------------------|------------|----------------|-------|----------------|-------|--|
| | | | | Average RRF (Initial) | (C.S. std) | Average RRF (Initial) | (C.S. std) | RRF (C.S. std) | %RSD | RRF (C.S. std) | %RSD | |
| 1 | 1EATZ (305) | 3/1/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.92135 | 0.94963 | 0.92135 | 0.94963 | 6.1085 | 6.109 | 6.1085 | 6.109 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.03870 | 1.04720 | 1.03870 | 1.04720 | 4.89709 | 4.897 | 4.89709 | 4.897 | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.09904 | 1.09904 | 1.09904 | 1.11730 | 4.93827 | 4.938 | 4.93827 | 4.938 | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.99684 | 0.99684 | 0.99684 | 1.05541 | 5.31525 | 5.315 | 5.31525 | 5.315 | |
| | | | OCDF (¹³ C-OCDD) | 1.26224 | 1.26224 | 1.26224 | 1.32988 | 9.39998 | 9.400 | 9.39998 | 9.400 | |
| 2 | 1EATZ | 4/21/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 1.088 | 1.088 | 1.10 | 1.29 | 1.20 | 1.29 | 1.20 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | | | | | |
| 3 | | | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | | | | | | | | | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | | | | | |

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.

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

LDC #: 232652
SDG #: See cover

Page: 6 of 7
Reviewer: [Signature]
2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Difference = $100 * (\text{ave. RRF} - \text{RRF}) / \text{ave. RRF}$ Where: ave. RRF = initial calibration average RRF
 RRF = $(A_x)(C_s) / (A_s)(C_x)$ RRF = continuing calibration RRF
 A_x = Area of compound, A_s = Area of associated internal standard
 C_x = Concentration of compound, C_s = Concentration of internal standard

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Average RRF (Initial) | Reported | | Recalculated | |
|---|-------------|------------------|--|-----------------------|----------|------|--------------|------|
| | | | | | RRF (CC) | %D | RRF (CC) | %D |
| 1 | 1A11/0375 | 5/15/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.92135 | 1.00105 | 8.7 | 1.00105 | 8.7 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.03870 | 1.13915 | 9.7 | 1.13915 | 9.7 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.09904 | 1.17829 | 7.2 | 1.17829 | 7.2 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.99684 | 1.10758 | 11.1 | 1.10758 | 11.1 |
| | | | OCDF (¹³ C-OCDD) | 1.26224 | 1.51414 | 20.0 | 1.51414 | 20.0 |
| 2 | 1A11/0375 | 5/17/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 0.997 | 10.5 | 0.997 | 10.5 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | 13.2 | | 13.1 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | |
| 3 | 1A11/0375 | 5/15/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.92135 | 1.02878 | 11.7 | 1.02878 | 11.7 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.03870 | 1.18429 | 14.0 | 1.18429 | 14.0 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.09904 | 1.19487 | 8.7 | 1.19487 | 8.7 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.99684 | 1.10722 | 10.7 | 1.10722 | 10.7 |
| | | | OCDF (¹³ C-OCDD) | 1.26224 | 1.49485 | 18.4 | 1.49485 | 18.4 |

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

LDC #: 2326517
 SDG #: 2326517

VALIDATION FINDINGS WORKSHEET
Laboratory Control Sample Results Verification

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

METHOD: GC/MS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Recovery = $100 * SSC/SA$ Where: SSC = Spiked sample concentration
 SA = Spike added

RPD = $|LCS - LCSD| * 2 / (LCS + LCSD)$

LCS = Laboratory control sample percent recovery

LCSD = Laboratory control sample duplicate percent recovery

LCS ID: 0123335

| Compound | Spike Added (PS/g) | | Spiked Sample Concentration (PS/g) | | LCS | | LCSD | | Percent Recovery | | RPD | |
|---------------------|--------------------|------|------------------------------------|------|----------|--------|----------|--------|------------------|--------|----------|--------------|
| | LCS | LCSD | LCS | LCSD | Reported | Recalc | Reported | Recalc | Reported | Recalc | Reported | Recalculated |
| 2,3,7,8-TCDD | 200 | NA | 243 | NA | 121 | 121 | | | | | | |
| 1,2,3,7,8-PeCDD | 100 | | 114 | | 114 | 114 | | | | | | |
| 1,2,3,4,7,8-HxCDD | | | 115 | | 115 | 115 | | | | | | |
| 1,2,3,4,7,8,9-HpCDF | | | 122 | | 122 | 122 | | | | | | |
| OCDF | 200 | | 256 | | 128 | 128 | | | | | | |
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Comments: Refer to Laboratory Control Sample findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

| Descriptor | Accurate mass ^(a) | Ion ID | Elemental Composition | Analyte | Descriptor | Accurate Mass ^(a) | Ion ID | Elemental Composition | Analyte | | |
|------------|------------------------------|----------|---------------------------------------|-------------------------------------|------------|------------------------------|--------|-------------------------------------|-----------|-------------------------------|------|
| 1 | 303.9016 | M | $C_{12}H_4^{35}Cl_4O$ | TCDF | 4 | 407.7818 | M+2 | $C_{12}H^{35}Cl_6^{37}ClO$ | HpCDF | | |
| | 305.8987 | M+2 | $C_{12}H_4^{35}Cl_3^{37}ClO$ | TCDF | | 409.7788 | M+4 | $C_{12}H^{35}Cl_5^{37}Cl_2O$ | HpCDF | | |
| | 315.9419 | M | $^{13}C_{12}H_4^{35}Cl_4O$ | TCDF (S) | | 417.8250 | M | $^{13}C_{12}H^{35}Cl_6O$ | HpCDF (S) | | |
| | 317.9389 | M+2 | $^{13}C_{12}H_4^{35}Cl_3^{37}ClO$ | TCDF (S) | | 419.8220 | M+2 | $^{13}C_{12}H^{35}Cl_5^{37}ClO$ | HpCDF | | |
| | 319.8965 | M | $C_{12}H_4^{35}Cl_4O_2$ | TCDD | | 423.7767 | M+2 | $C_{12}H^{35}Cl_6^{37}ClO_2$ | HpCDD | | |
| | 321.8936 | M+2 | $C_{12}H_4^{35}Cl_3^{37}ClO_2$ | TCDD | | 425.7737 | M+4 | $C_{12}H^{35}Cl_5^{37}Cl_2O_2$ | HpCDD | | |
| | 331.9368 | M | $^{13}C_{12}H_4^{35}Cl_4O_2$ | TCDD (S) | | 435.8169 | M+2 | $^{13}C_{12}H^{35}Cl_6^{37}ClO_2$ | HpCDD (S) | | |
| | 333.9338 | M+2 | $^{13}C_{12}H_4^{35}Cl_3^{37}ClO_2$ | TCDD (S) | | 437.8140 | M+4 | $^{13}C_{12}H^{35}Cl_5^{37}Cl_2O_2$ | HpCDD (S) | | |
| | 375.8364 | M+2 | $C_{12}H_4^{35}Cl_5^{37}ClO$ | HxCDFE | | 479.7165 | M+4 | $C_{12}H^{35}Cl_7^{37}Cl_2O$ | NCDFE | | |
| | [354.9792] | LOCK | C_9F_{13} | PFK | | [430.9728] | LOCK | C_9F_{17} | PFK | | |
| | 2 | 339.8597 | M+2 | $C_{12}H_3^{35}Cl_4^{37}ClO$ | | PeCDF | 5 | 441.7428 | M+2 | $C_{12}^{35}Cl_3^{37}ClO$ | OCDF |
| | | 341.8567 | M+4 | $C_{12}H_3^{35}Cl_3^{37}Cl_2O$ | | PeCDF | | 443.7399 | M+4 | $C_{12}^{35}Cl_6^{37}Cl_2O$ | OCDF |
| | | 351.9000 | M+2 | $^{13}C_{12}H_3^{35}Cl_3^{37}ClO$ | | PeCDF (S) | | 457.7377 | M+2 | $C_{12}^{35}Cl_7^{37}ClO_2$ | OCDD |
| | | 353.8970 | M+4 | $^{13}C_{12}H_3^{35}Cl_3^{37}Cl_2O$ | | PeCDF (S) | | 459.7348 | M+4 | $C_{12}^{35}Cl_6^{37}Cl_2O_2$ | OCDD |
| 355.8546 | | M+2 | $C_{12}H_3^{35}Cl_4^{37}ClO_2$ | PeCDD | 469.7780 | M+2 | | $^{13}C_{12}^{35}Cl_7^{37}ClO_2$ | OCDD (S) | | |
| 357.8516 | | M+4 | $C_{12}H_3^{35}Cl_3^{37}Cl_2O_2$ | PeCDD | 471.7750 | M+4 | | $^{13}C_{12}^{35}Cl_6^{37}Cl_2O_2$ | OCDD (S) | | |
| 367.8949 | | M+2 | $^{13}C_{12}H_3^{35}Cl_3^{37}ClO_2$ | PeCDD (S) | 513.6775 | M+4 | | $C_{12}^{35}Cl_3^{37}Cl_2O$ | DCDFE | | |
| 369.8919 | | M+4 | $^{13}C_{12}H_3^{35}Cl_3^{37}Cl_2O_2$ | PeCDD (S) | [422.9278] | LOCK | | $C_{10}F_{17}$ | PFK | | |
| 409.7974 | | M+2 | $C_{12}H_3^{35}Cl_6^{37}ClO$ | HxCDFE | | | | | | | |
| [354.9792] | | LOCK | C_9F_{13} | PFK | | | | | | | |
| 3 | | 373.8208 | M+2 | $C_{12}H_2^{35}Cl_5^{37}ClO$ | HxCDF | | | | | | |
| | | 375.8178 | M+4 | $C_{12}H_2^{35}Cl_4^{37}Cl_2O$ | HxCDF | | | | | | |
| | | 383.8639 | M | $^{13}C_{12}H_2^{35}Cl_5O$ | HxCDF (S) | | | | | | |
| | | 385.8610 | M+2 | $^{13}C_{12}H_2^{35}Cl_4^{37}ClO$ | HxCDF (S) | | | | | | |
| | 389.8156 | M+2 | $C_{12}H_2^{35}Cl_5^{37}ClO_2$ | HxCDD | | | | | | | |
| | 391.8127 | M+4 | $C_{12}H_2^{35}Cl_4^{37}Cl_2O_2$ | HxCDD | | | | | | | |
| | 401.8559 | M+2 | $^{13}C_{12}H_2^{35}Cl_5^{37}ClO_2$ | HxCDD (S) | | | | | | | |
| | 403.8529 | M+4 | $^{13}C_{12}H_2^{35}Cl_4^{37}Cl_2O_2$ | HxCDD (S) | | | | | | | |
| | 445.7555 | M+4 | $C_{12}H_2^{35}Cl_6^{37}Cl_2O$ | OCDFE | | | | | | | |
| | [430.9728] | LOCK | C_9F_{17} | PFK | | | | | | | |

(a) The following nuclidic masses were used:

H = 1.007825
C = 12.000000
¹³C = 13.003355
O = 15.994915
³⁵Cl = 34.968853
³⁷Cl = 36.965903
F = 18.9984

S = internal/recovery standard

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 26, 2010
LDC Report Date: June 9, 2010
Matrix: Water
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.
Sample Delivery Group (SDG): G0D280571

Sample Identification

EB-04262010-1-RZD

Introduction

This data review covers one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- 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. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds with the following exceptions:

| Date | Compound | %D | Associated Samples | Affected Compound | Flag | A or P |
|--------|-------------------|------|--------------------|-------------------|------------------|--------|
| 5/6/10 | 1,2,3,6,7,8-HxCDF | 20.1 | 0123391MB | 1,2,3,6,7,8-HxCDF | J+ (all detects) | P |

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|--|------------------------------|
| 0123391MB | 5/3/10 | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 1.3 pg/L 4.1 pg/L 2.7 pg/L 1.0 pg/L 2.1 pg/L 3.1 pg/L 4.4 pg/L 3.4 pg/L | All samples in SDG G0D280571 |

Sample concentrations were compared to concentrations detected in the method blanks as required by the QAPP. No sample data was qualified with the following exceptions:

| Sample | Compound | Reported Concentration | Modified Final Concentration |
|-------------------|---|---|---|
| EB-04262010-1-RZD | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF | 2.1 pg/L 6.8 pg/L 7.6 pg/L 4.5 pg/L 12 pg/L 5.3 pg/L | 2.1U pg/L 6.8U pg/L 7.6U pg/L 4.5U pg/L 12U pg/L 5.3U pg/L |

Sample EB-04262010-1-RZD was identified as an equipment blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|--------------------|---------------|--|--|-----------------------------------|
| EB-04262010-1-RZD | 4/26/10 | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 2.1 pg/L 6.8 pg/L 7.6 pg/L 4.5 pg/L 1.3 pg/L 12 pg/L 5.3 pg/L 25 pg/L | No associated samples in this SDG |

VI. 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.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits.

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D280571 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D280571 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D280571**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|-------------------|---------------------------------------|------------------|--------|---------------------------------|
| G0D280571 | EB-04262010-1-RZD | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D280571 | EB-04262010-1-RZD | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0D280571**

| SDG | Sample | Compound | Modified Final Concentration | A or P | Code |
|-----------|-------------------|---|---|--------|------|
| G0D280571 | EB-04262010-1-RZD | 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF | 2.1U pg/L 6.8U pg/L 7.6U pg/L 4.5U pg/L 12U pg/L 5.3U pg/L | A | bl |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG G0D280571**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265U21
 SDG #: G0D280571
 Laboratory: Test America

Date: 6/5/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/26/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ICV | W | |
| V. | Blanks | W | |
| VI. | Matrix spike/Matrix spike duplicates | N | client specified |
| VII. | Laboratory control samples | A | ICS |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | A | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | SN | All ZMP C (Q flag) - JK (K) |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | W | ZB = 1 |

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

Validated Samples:

| | | | | | | | |
|----|-------------------|---|----|-----------|----|--|----|
| 1 | EB-04262010-1-RZD | W | 11 | 0123391MB | 21 | | 31 |
| 2 | | | 12 | | | | 32 |
| 3 | | | 13 | | | | 33 |
| 4 | | | 14 | | | | 34 |
| 5 | | | 15 | | | | 35 |
| 6 | | | 16 | | | | 36 |
| 7 | | | 17 | | | | 37 |
| 8 | | | 18 | | | | 38 |
| 9 | | | 19 | | | | 39 |
| 10 | | | 20 | | | | 40 |

Notes: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDD |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 27, 2010
LDC Report Date: June 8, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.
Sample Delivery Group (SDG): G0D280586

Sample Identification

SSAK3-05-1BPC
SSAK8-05-1BPC

Introduction

This data review covers 2 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- 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. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|--|------------------------------|
| 0123335MB | 5/3/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,4,6,7,8-HpCDF OCDF | 0.085 pg/g 0.60 pg/g 0.086 pg/g 0.079 pg/g 0.14 pg/g | All samples in SDG GOD280586 |

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

Samples FB-04072010-RZD (from SDG G0D090441) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---|---|------------------------------|
| FB-04072010-RZD | 4/7/10 | 1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.89 pg/L 1.5 pg/L 2.2 pg/L 8.3 pg/L 1.4 pg/L 1.6 pg/L 1.5 pg/L 1.6 pg/L 1.3 pg/L 1.4 pg/L 4.1 pg/L | All samples in SDG G0D280586 |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|---------------|----------------------|-------------|--------------|--|--------|
| SSAK8-05-1BPC | ¹³ C-OCDD | 37 (40-135) | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|---------------|-----------------------------|---|---|------------------------------------|--------|
| SSAK3-05-1BPC | 1,2,3,4,6,7,8-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D280586 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D280586 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D280586**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|----------------------------------|--|--|--------|------------------------------------|
| G0D280586 | SSAK8-05-1 BPC | OCDD OCDF | J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D280586 | SSAK3-05-1 BPC | 1,2,3,4,6,7,8-HpCDF OCDF | J (all detects) J (all detects) | A | Project Quantitation Limit (e) |
| G0D280586 | SSAK3-05-1 BPC SSAK8-05-1 BPC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D280586 | SSAK3-05-1 BPC SSAK8-05-1 BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D280586**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG
G0D280586**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D280586**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 23265V21
 SDG #: G0D280586
 Laboratory: Test America

Date: 4/27/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/27/10 |
| II. | HRGC/HRMS Instrument performance check | A |
| III. | Initial calibration | A |
| IV. | Routine calibration/IC | A |
| V. | Blanks | W |
| VI. | Matrix spike/Matrix spike duplicates | W No spl assid- No Anal |
| VII. | Laboratory control samples | A LES |
| VIII. | Regional quality assurance and quality control | N |
| IX. | Internal standards | W |
| X. | Target compound identifications | N |
| XI. | Compound quantitation and CRQLs | SN |
| XII. | System performance | N |
| XIII. | Overall assessment of data | A |
| XIV. | Field duplicates | N |
| XV. | Field blanks | W FB-04272010-R2D (401090441) |

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

Validated Samples:

| | | | | | |
|----|---------------|------|-----------|----|----|
| 1 | SSAK3-05-1BPC | S 11 | 0123335MB | 21 | 31 |
| 2 | SSAK8-05-1BPC | V 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: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDD |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 28, 2010
LDC Report Date: June 9, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 4
Laboratory: TestAmerica, Inc.
Sample Delivery Group (SDG): GOD300450
Sample Identification
SSAN6-07-1BPC

Introduction

This data review covers one soil sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- 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. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

The exact mass of 380.9760 of PFK was verified. The static resolving power was at least 10,000 (10% valley definition).

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

The minimum S/N ratio for each target compound was greater than or equal to 2.5 and greater than or equal to 10 for each recovery and internal standard compound for samples.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds with the following exceptions:

| Date | Compound | %D | Associated Samples | Affected Compound | Flag | A or P |
|---------|-------------------|------|--------------------|-------------------|------------------|--------|
| 5/17/10 | 1,2,3,4,7,8-HxCDD | 20.2 | SSAN6-07-1BPC | 1,2,3,4,7,8-HxCDD | J+ (all detects) | P |

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|---|------------------------------|
| 0124370MB | 5/4/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.12 pg/g 0.49 pg/g 0.26 pg/g 0.13 pg/g 0.28 pg/g 0.15 pg/g 0.35 pg/g 0.18 pg/g 0.80 pg/g | All samples in SDG G0D300450 |

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

Sample FB-04072010-RZC (from SDG G0D130519) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|--|--|------------------------------|
| FB-04072010-RZC | 4/8/10 | 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.77 pg/L 0.74 pg/L 0.82 pg/L 4.2 pg/L 37 pg/L 0.57 pg/L 0.96 pg/L 0.67 pg/L 1.1 pg/L 0.96 pg/L 1.0 pg/L 1.0 pg/L 2.1 pg/L 1.5 pg/L 6.7 pg/L | All samples in SDG G0D300450 |

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

VI. 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 not within QC limits. Since there were no associated samples, no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|---------------|--|---|---|---|--------|
| SSAN6-07-1BPC | ¹³ C-2,3,7,8-TCDF ¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDF ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,4,7,8-HxCDF ¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD | 22 (40-135) 27 (40-135) 30 (40-135) 31 (40-135) 32 (40-135) 29 (40-135) 33 (40-135) 33 (40-135) 28 (40-135) | All TCL compounds | J (all detects) UJ (all non-detects) | P |
| 0124370MB | ¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-OCDD | 36 (40-135) 37 (40-135) 38 (40-135) 33 (40-135) | 2,3,7,8-TCDD 1,2,3,7,8-PeCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

All target compound identifications were within validation criteria.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|---------------|---|---|---|---|--------|
| SSAN6-07-1BPC | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG G0D300450 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D300450 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

XII. System Performance

The system performance was acceptable.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D300450**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|---------------|---|---|--------|-------------------------------------|
| G0D300450 | SSAN6-07-1BPC | 1,2,3,4,7,8-HxCDD | J+ (all detects) | P | Routine calibration (%D) (c) |
| G0D300450 | SSAN6-07-1BPC | All TCL compounds | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D300450 | SSAN6-07-1BPC | 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P | Compound quantitation and CRQLs (e) |
| G0D300450 | SSAN6-07-1BPC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D300450 | SSAN6-07-1BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0D300450**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D300450**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 23265W21
 SDG #: G0D300450
 Laboratory: Test America

Stage 2B4

Date: 4/9/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/28/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/DC | SW | |
| V. | Blanks | SW | |
| VI. | Matrix spike/Matrix spike duplicates | SW | No sp/ass'd |
| VII. | Laboratory control samples | A | LEG |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | SW | |
| X. | Target compound identifications | A | |
| XI. | Compound quantitation and CRQLs | SW | |
| XII. | System performance | A | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | SW | FB-04072010-RZC(G0D130519) |

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

Validated Samples:

| | | | | | | | | |
|----|---------------|---|----|-----------|----|--|----|--|
| 1 | SSAN6-07-1BPC | S | 11 | 012437 MB | 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 #: 23265WB1
 SDG #: See cover

VALIDATION FINDINGS CHECKLIST

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

Method: Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| Validation Area | Yes | No | NA | Findings/Comments |
|--|-------------------------------------|-------------------------------------|--------------------------|-------------------|
| I. Technical holding times | | | | |
| All technical holding times were met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Cooler temperature criteria was met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| II. GC/MS Instrument performance check | | | | |
| Was PFK exact mass 380.9760 verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the retention time windows established for all homologues? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomers $\leq 25\%$? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the static resolving power at least 10,000 (10% valley definition)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the mass resolution adequately check with PFK? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the presence of 1,2,8,9-TCDD and 1,3,4,6,8-PeCDF verified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| III. Initial calibration | | | | |
| Was the initial calibration performed at 5 concentration levels? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent relative standard deviations (%RSD) $\leq 20\%$ for unlabeled standards and $< 30\%$ for labeled standards? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Did all calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was the signal to noise ratio for each target compound ≥ 2.5 and for each recovery and internal standard > 10 ? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| IV. Continuing calibration | | | | |
| Was a routine calibration performed at the beginning and end of each 12 hour period? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all percent differences (%D) $\leq 20\%$ for unlabeled standards and $\leq 30\%$ for labeled standards? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| Did all routine calibration standards meet the Ion Abundance Ratio criteria? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| V. Blanks | | | | |
| Was a method blank associated with every sample in this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was a method blank performed for each matrix and concentration? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| VI. 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| VII. Laboratory control samples | | | | |
| Was an LCS analyzed for this SDG? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was an LCS analyzed per extraction batch? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| | | | |
|---|-------------------------------------|--|--|
| VIII. Regional Quality Assurance and Quality Control | | | |
| Were performance evaluation (PE) samples performed? | <input checked="" type="checkbox"/> | | |
| Were the performance evaluation (PE) samples within the acceptance limits? | <input checked="" type="checkbox"/> | | |
| IX. Internal standards | | | |
| Were internal standard recoveries within the 40-135% criteria? | <input checked="" type="checkbox"/> | | |
| Was the minimum S/N ratio of all internal standard peaks ≥ 10 ? | <input checked="" type="checkbox"/> | | |
| X. Target compound identification | | | |
| For 2,3,7,8 substituted congeners with associated labeled standards, were the retention times of the two quantitation peaks within -1 to 3 sec. of the RT of the labeled standard? | <input checked="" type="checkbox"/> | | |
| For 2,3,7,8 substituted congeners without associated labeled standards, were the relative retention times of the two quantitation peaks within 0.005 time units of the RRT measured in the routine calibration? | <input checked="" type="checkbox"/> | | |
| For non-2,3,7,8 substituted congeners, were the retention times of the two quantitation peaks within RT established in the performance check solution? | <input checked="" type="checkbox"/> | | |
| Did compound spectra contain all characteristic ions listed in the table attached? | <input checked="" type="checkbox"/> | | |
| Was the Ion Abundance Ratio for the two quantitation ions within criteria? | <input checked="" type="checkbox"/> | | |
| Was the signal to noise ratio for each target compound and labeled standard > 2.5 ? | <input checked="" type="checkbox"/> | | |
| Does the maximum intensity of each specified characteristic ion coincide within ± 2 seconds (includes labeled standards)? | <input checked="" type="checkbox"/> | | |
| For PCDF identification, was any signal ($S/N \geq 2.5$, at \pm seconds RT) detected in the corresponding PCDPE channel? | <input checked="" type="checkbox"/> | | |
| Was an acceptable lock mass recorded and monitored? | <input checked="" type="checkbox"/> | | |
| XI. Compound quantitation/CRQLs | | | |
| Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound? | <input checked="" type="checkbox"/> | | |
| Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation? | <input checked="" type="checkbox"/> | | |
| XII. System performance | | | |
| System performance was found to be acceptable. | <input checked="" type="checkbox"/> | | |
| XIII. Overall assessment of data | | | |
| Overall assessment of data was found to be acceptable. | <input checked="" type="checkbox"/> | | |
| XIV. Field duplicates | | | |
| Field duplicate pairs were identified in this SDG. | <input checked="" type="checkbox"/> | | |
| Target compounds were detected in the field duplicates. | <input checked="" type="checkbox"/> | | |
| XV. Field blanks | | | |
| Field blanks were identified in this SDG. | <input checked="" type="checkbox"/> | | |
| Target compounds were detected in the field blanks. | <input checked="" type="checkbox"/> | | |

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

LDC #: 23265W21
SDG #: See Cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

Y N N/A Were field blanks identified in this SDG?

Blank units: pg/L Associated sample units: pg/g

Sampling date: 4/8/10

Field blank type: (circle one) Field Blank / Rinsate / Other: All (>5X) Associated Samples: All (>5X)

| Compound | Blank ID | Sample Identification | | | | |
|----------|-----------------|-----------------------|--|--|--|--|
| | | | | | | |
| | FB-04072010-R7C | 5X | | | | |
| C | 0.77 | 0.00385 | | | | |
| D | 0.74 | 0.0037 | | | | |
| E | 0.82 | 0.0041 | | | | |
| F | 4.2 | 0.021 | | | | |
| G | 37 | 0.185 | | | | |
| H | 0.57 | 0.00285 | | | | |
| I | 0.96 | 0.0048 | | | | |
| J | 0.67 | 0.00335 | | | | |
| K | 1.1 | 0.0055 | | | | |
| L | 0.96 | 0.0048 | | | | |
| M | 1.0 | 0.005 | | | | |
| N | 1.0 | 0.005 | | | | |
| O | 2.1 | 0.0105 | | | | |
| P | 1.5 | 0.0075 | | | | |
| Q | 6.7 | 0.0335 | | | | |
| | | | | | | |
| | | | | | | |
| CRQL | | | | | | |

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

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

$RRF = (A_x)(C_s)/(A_s)(C_x)$
 average RRF = sum of the RRFs/number of standards
 $\%RSD = 100 * (S/X)$

A_x = Area of compound,
 C_x = Concentration of compound,
 S = Standard deviation of the RRFs,
 A_s = Area of associated internal standard
 C_s = Concentration of internal standard
 X = Mean of the RRFs

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Reported | | Recalculated | | Reported | | Recalculated | |
|---|---------------|------------------|--|-----------------------|-----------|-----------------------|-----------|---------------|---------|---------------|-------|
| | | | | Average RRF (Initial) | (C.3 std) | Average RRF (Initial) | (C.3 std) | RRF (C.3 std) | %RSD | RRF (C.3 std) | %RSD |
| 1 | 1e2z (305) | 3/1/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.92135 | 0.94963 | 0.92135 | 0.94963 | 0.94963 | 6.1085 | 0.94963 | 6.109 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.03870 | 1.04720 | 1.03870 | 1.04720 | 1.04720 | 4.89709 | 1.04720 | 4.897 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.09904 | 1.11730 | 1.09904 | 1.11730 | 1.11730 | 4.93827 | 1.11730 | 4.938 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.99684 | 1.05541 | 0.99684 | 1.05541 | 1.05541 | 5.31535 | 1.05541 | 5.315 |
| | | | OCDF (¹³ C-OCDF) | 1.26224 | 1.32988 | 1.26224 | 1.32988 | 1.32988 | 9.39998 | 1.32988 | 9.400 |
| 2 | 1e2z | 4/21/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 1.10 | 1.088 | 1.10 | 1.10 | 1.29 | 1.10 | 1.20 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | | | |
| | | | OCDF (¹³ C-OCDF) | | | | | | | | |
| 3 | 1e2z | 5/11/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.017 | 1.06 | 1.017 | 1.06 | 1.06 | 5.39 | 1.06 | 5.70 |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 0.991 | 1.01 | 0.991 | 1.01 | 1.01 | 5.17 | 1.01 | 4.90 |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.155 | 1.21 | 1.155 | 1.21 | 1.21 | 7.50 | 1.21 | 7.75 |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.044 | 1.12 | 1.044 | 1.12 | 1.12 | 8.97 | 1.12 | 8.81 |
| | | | OCDF (¹³ C-OCDF) | 1.574 | 1.66 | 1.574 | 1.66 | 1.66 | 8.82 | 1.66 | 8.72 |

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.

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

% Difference = $100 * (\text{ave. RRF} - \text{RRF}) / \text{ave. RRF}$ Where: ave. RRF = initial calibration average RRF
 RRF = $(A_x)(C_s) / (A_s)(C_x)$ RRF = continuing calibration RRF
 A_x = Area of compound, A_s = Area of associated internal standard
 C_x = Concentration of compound, C_s = Concentration of internal standard

| # | Standard ID | Calibration Date | Compound (Reference Internal Standard) | Average RRF (Initial) | Reported | | Recalculated | | %D | |
|---|-------------|------------------|--|-----------------------|----------|------|--------------|------|------|--|
| | | | | | RRF (CC) | %D | RRF (CC) | %D | | |
| 1 | 1745/1025 | 5/15/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 0.92135 | 1.02878 | 11.7 | 1.02878 | 11.7 | 11.7 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 1.03870 | 1.18429 | 14.0 | 1.18429 | 14.0 | 14.0 | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.09904 | 1.19487 | 8.7 | 1.19487 | 8.7 | 8.7 | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 0.99684 | 1.10322 | 10.7 | 1.10322 | 10.7 | 10.7 | |
| | | | OCDF (¹³ C-OCDD) | 1.26224 | 1.49485 | 18.4 | 1.49485 | 18.4 | 18.4 | |
| 2 | 1745/1025 | 5/17/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.017 | 1.04 | 2.4 | 1.04 | 2.4 | 2.4 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | 0.991 | 1.07 | 7.7 | 1.07 | 7.7 | 7.7 | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | 1.155 | 1.21 | 4.5 | 1.21 | 4.5 | 4.5 | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | 1.044 | 1.12 | 7.2 | 1.12 | 7.2 | 7.2 | |
| | | | OCDF (¹³ C-OCDD) | 1.544 | 1.61 | 4.1 | 1.61 | 4.1 | 4.1 | |
| 3 | 1745/1025 | 5/18/10 | 2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF) | 1.088 | 1.15 | 5.3 | 1.15 | 5.3 | 5.3 | |
| | | | 2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD) | | | | | | | |
| | | | 1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD) | | | | | | | |
| | | | 1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD) | | | | | | | |
| | | | OCDF (¹³ C-OCDD) | | | | | | | |

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

| Descriptor | Accurate mass ^(a) | Ion ID | Elemental Composition | Analyte | Descriptor | Accurate Mass ^(a) | Ion ID | Elemental Composition | Analyte | | | |
|------------|------------------------------|----------|---|--|------------|------------------------------|------------|--|---|---|---|------|
| 1 | 303.9016 | M | C ₁₂ H ₉ ³⁵ Cl ₃ O | TCDF | 4 | 407.7618 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO | HpCDF | | | |
| | 305.8987 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ Cl ₂ O | TCDF | | M+4 | 409.7788 | M+4 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ Cl ₂ O | HpCDF | | |
| | 315.9419 | M | C ₁₂ H ₉ ³⁵ Cl ₄ O | TCDF (S) | | M | 417.8250 | M | C ₁₂ H ₉ ³⁵ Cl ₄ O | HpCDF (S) | | |
| | 317.9389 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO | TCDF (S) | | M+2 | 419.8220 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO | HpCDF | | |
| | 319.8965 | M | C ₁₂ H ₉ ³⁵ Cl ₄ O ₂ | TCDD | | M+2 | 423.7767 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO ₂ | HpCDD | | |
| | 321.8936 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ Cl ₂ O | TCDD | | M+4 | 425.7737 | M+4 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ Cl ₂ O | HpCDD | | |
| | 331.9368 | M | C ₁₂ H ₉ ³⁵ Cl ₄ O ₂ | TCDD (S) | | M+2 | 435.8169 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | HpCDD (S) | | |
| | 333.9338 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO ₂ | TCDD (S) | | M+4 | 437.8140 | M+4 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO ₂ | HpCDD (S) | | |
| | 375.8364 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₅ ³⁷ ClO | HxCDFPE | | M+4 | 479.7165 | M+4 | C ₁₂ H ₉ ³⁵ Cl ₅ ³⁷ ClO | NCDPE | | |
| | [354.9792] | LOCK | C ₉ F ₁₃ | PFK | | LOCK | [430.9728] | LOCK | C ₉ F ₁₇ | PFK | | |
| | 2 | 339.8597 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO | | PeCDF | 5 | 441.7428 | M+2 | C ₁₂ ³⁵ Cl ₃ ³⁷ ClO | OCDF | |
| | | 341.8567 | M+4 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ Cl ₂ O | | PeCDF | | M+4 | 443.7399 | M+4 | C ₁₂ ³⁵ Cl ₃ ³⁷ Cl ₂ O | OCDF |
| | | 351.9000 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ ClO | | PeCDF (S) | | M+2 | 457.7377 | M+2 | C ₁₂ ³⁵ Cl ₃ ³⁷ ClO ₂ | OCDD |
| | | 353.8970 | M+4 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ Cl ₂ O | | PeCDF (S) | | M+4 | 459.7348 | M+4 | C ₁₂ ³⁵ Cl ₃ ³⁷ Cl ₂ O | OCDD |
| 355.8546 | | M+2 | C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ ClO ₂ | PeCDD | M+2 | 469.7780 | | M+2 | C ₁₂ ³⁵ Cl ₃ ³⁷ ClO ₂ | OCDD (S) | | |
| 357.8516 | | M+4 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | PeCDD | M+4 | 471.7750 | | M+4 | C ₁₂ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | OCDD (S) | | |
| 367.8949 | | M+2 | C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ ClO ₂ | PeCDD (S) | M+4 | 513.6775 | | M+4 | C ₁₂ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | OCDD (S) | | |
| 369.8919 | | M+4 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | PeCDD (S) | M+4 | [422.9278] | | M+4 | C ₁₂ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂ | DCDPE | | |
| 409.7974 | | M+2 | C ₁₂ H ₉ ³⁵ Cl ₅ ³⁷ ClO | HxCDFPE | LOCK | [430.9728] | | LOCK | C ₉ F ₁₇ | PFK | | |
| [354.9792] | | LOCK | C ₉ F ₁₃ | PFK | | | | | | | | |
| 3 | | 373.8208 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₅ ³⁷ ClO | HxCDF | | | | | | | |
| | | 375.8178 | M+4 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ Cl ₂ O | HxCDF | | | | | | | |
| | | 383.8639 | M | C ₁₂ H ₉ ³⁵ Cl ₅ O | HxCDF (S) | | | | | | | |
| | | 385.8610 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO | HxCDF (S) | | | | | | | |
| | 389.8156 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ ClO ₂ | HxCDD | | | | | | | | |
| | 391.8127 | M+4 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO ₂ | HxCDD | | | | | | | | |
| | 401.8559 | M+2 | C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ Cl ₂ O | HxCDD (S) | | | | | | | | |
| | 403.8529 | M+4 | C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO ₂ | HxCDD (S) | | | | | | | | |
| | 445.7555 | M+4 | C ₁₂ H ₉ ³⁵ Cl ₅ ³⁷ Cl ₂ O | OCDFPE | | | | | | | | |
| | [430.9728] | LOCK | C ₉ F ₁₇ | PFK | | | | | | | | |

(e) The following nuclidic masses were used:

- H = 1.007825
- C = 12.000000
- ¹³C = 13.003355
- F = 18.9984
- O = 15.994915
- ³⁵Cl = 34.968853
- ³⁷Cl = 36.965903

S = internal/recovery standard

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 28, 2010
LDC Report Date: June 8, 2010
Matrix: Soil
Parameters: Dioxins/Dibenzofurans
Validation Level: Stage 2B
Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): GOD300454

Sample Identification

RSAQ3-1BPC
RSAQ3-2BPC
SA169-4BPC
RSAQ3-2BPCMS
RSAQ3-2BPCMSD

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 8290 for Polychlorinated Dioxins/Dibenzofurans.

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 USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005).

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

Raw data were not reviewed for this SDG. The review was based on QC data.

The following are definitions of the data qualifiers:

- J+ Data are qualified as estimated, with a high bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J- Data are qualified as estimated, with a low bias likely to occur. False positives or false negatives are unlikely to have been reported.
- J Data are qualified as estimated; it is not possible to assess the direction of the potential bias. False positives or false negatives are unlikely to have been reported.
- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- R Data are qualified as rejected. There is a significant potential for the reporting of false negatives or false positives.
- UU Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- B The analytical result may be a false positive totally attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JB The analytical result may be biased high and partially attributable to blank contamination. This qualifier is applicable to radiochemistry analysis only.
- JK The analytical result is an estimated maximum possible concentration (EMPC).
- X The analytical result is not used for reporting because a more accurate and precise result is reported in its place.
- J-TDS The analytical result is estimated based on failure of the Total Dissolved Solids (TDS) correctness check performed in accordance with the Standard Method 1030E.
- J-CAB The analytical result is estimated based on failure of the cation-anion balance correctness check performed in accordance with Standard Method 1030E.
- J-TDS & CAB The analytical result is unreliable based on the failure of the cation-anion balance and TDS correctness check performed in accordance with standard Method 1030E.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

Retention time windows were established for all homologues. The chromatographic resolution between 2,3,7,8-TCDD and peaks representing any other unlabeled TCDD isomer was less than or equal to 25% .

III. Initial Calibration

A five point initial calibration was performed as required by the method.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

All of the routine calibration percent differences (%D) between the initial calibration RRF and the routine calibration RRF were less than or equal to 20.0% for unlabeled compounds and less than or equal to 30.0% for labeled compounds.

The ion abundance ratios for all PCDDs and PCDFs were within validation criteria.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No polychlorinated dioxin/dibenzofuran contaminants were found in the method blanks with the following exceptions:

| Method Blank ID | Extraction Date | Compound | Concentration | Associated Samples |
|-----------------|-----------------|--|---|------------------------------|
| 0124370MB | 5/4/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.12 pg/g 0.49 pg/g 0.26 pg/g 0.13 pg/g 0.28 pg/g 0.15 pg/g 0.35 pg/g 0.18 pg/g 0.80 pg/g | All samples in SDG G0D300454 |

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

Samples EB-04282010-RZB (from SDG G0D300598) was identified as an equipment blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Equipment Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|--------------------|---------------|---|--|------------------------------|
| EB-04282010-RZB | 4/28/10 | 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 3.8 pg/L 5.2 pg/L 5.2 pg/L 7.5 pg/L 3.7 pg/L 16 pg/L 12 pg/L 2.7 pg/L 2.0 pg/L 43 pg/L 9.9 pg/L 76 pg/L | All samples in SDG G0D300454 |

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

Samples FB-04062010-RZB (from SDG G0D120488) was identified as a field blank. No polychlorinated dioxin/dibenzofuran contaminants were found in this blank with the following exceptions:

| Field Blank ID | Sampling Date | Compound | Concentration | Associated Samples |
|-----------------|---------------|---|---|---------------------------------|
| FB-04062010-RZB | 4/6/10 | 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | 0.68 pg/L 2.5 pg/L 6.2 pg/L 2.7 pg/L 1.4 pg/L 0.82 pg/L 0.94 pg/L 1.8 pg/L 1.2 pg/L 4.4 pg/L | All samples in SDG G0D300454 |

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

VI. 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 MSD or LCS percent recoveries (%R) were within QC limits and no data were qualified.

VII. Laboratory Control Samples (LCS)

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

VIII. Regional Quality Assurance and Quality Control

Not applicable.

IX. Internal Standards

All internal standard recoveries were within QC limits with the following exceptions:

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|------------|--|--|--|---|--------|
| RSAQ3-1BPC | ¹³ C-2,3,7,8-TCDF ¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDF ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,4,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDD | 32 (40-135) 35 (40-135) 36 (40-135) 31 (40-135) 38 (40-135) 36 (40-135) | 2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,4,6,7,8-HpCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF | J (all detects) UJ (all non-detects) | P |

| Sample | Internal Standards | %R (Limits) | Compound | Flag | A or P |
|------------|--|---|--|---|--------|
| RSAQ3-2BPC | ¹³ C-2,3,7,8-TCDF ¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,6,7,8-HxCDD | 37 (40-135) 35 (40-135) 38 (40-135) 39 (40-135) | 2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 2,3,7,8-TCDF | J (all detects) UJ (all non-detects) | P |
| SA169-4BPC | ¹³ C-2,3,7,8-TCDF ¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDF ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,4,7,8-HxCDF ¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD | 25 (40-135) 31 (40-135) 35 (40-135) 30 (40-135) 32 (40-135) 31 (40-135) 26 (40-135) 22 (40-135) 12 (40-135) | All TCL compounds | J (all detects) UJ (all non-detects) | P |
| 0124370MB | ¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-OCDD | 36 (40-135) 37 (40-135) 38 (40-135) 33 (40-135) | 2,3,7,8-TCDD 1,2,3,7,8-PeCDD OCDD 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) UJ (all non-detects) | P |

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Project Quantitation Limit

All compound quantitation and CRQLs were within validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|------------|--|---|---|--|--------|
| SA169-4BPC | 2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P |

All compounds reported below the PQL were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|---------------------------------------|-----------------|--------|
| All samples in SDG GOD300454 | All compounds reported below the PQL. | J (all detects) | A |

All compounds reported as EMPC were qualified as follows:

| Sample | Finding | Flag | A or P |
|------------------------------|--|------------------|--------|
| All samples in SDG G0D300454 | All compounds reported as estimated maximum possible concentration (EMPC). | JK (all detects) | A |

Raw data were not reviewed for this SDG.

XII. System Performance

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

No field duplicates were identified in this SDG.

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0D300454**

| SDG | Sample | Compound | Flag | A or P | Reason (Code) |
|-----------|--|--|--|--------|------------------------------------|
| G0D300454 | RSAQ3-1BPC | 2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,4,6,7,8-HpCDD 2,3,7,8-TCDF 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D300454 | RSAQ3-2BPC | 2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 2,3,7,8-TCDF | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D300454 | SA169-4BPC | All TCL compounds | J (all detects) UJ (all non-detects) | P | Internal standards (%R) (i) |
| G0D300454 | SA169-4BPC | 2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF | J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) | P | Project Quantitation Limit (e) |
| G0D300454 | RSAQ3-1BPC RSAQ3-2BPC SA169-4BPC | All compounds reported below the PQL. | J (all detects) | A | Project Quantitation Limit (sp) |
| G0D300454 | RSAQ3-1BPC RSAQ3-2BPC SA169-4BPC | All compounds reported as EMPC | JK (all detects) | A | Project Quantitation Limit (k) |

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0D300454**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG
G0D300454**

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0D300454

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

LDC #: 23265X21
 SDG #: G0D300454
 Laboratory: Test America

Stage 2B

Date: 6/9/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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: 4/28/10 |
| II. | HRGC/HRMS Instrument performance check | A | |
| III. | Initial calibration | A | |
| IV. | Routine calibration/ICV | A | |
| V. | Blanks | W | |
| VI. | Matrix spike/Matrix spike duplicates | W | |
| VII. | Laboratory control samples | A | LC9 |
| VIII. | Regional quality assurance and quality control | N | |
| IX. | Internal standards | W | |
| X. | Target compound identifications | N | |
| XI. | Compound quantitation and CRQLs | W | |
| XII. | System performance | N | |
| XIII. | Overall assessment of data | A | |
| XIV. | Field duplicates | N | |
| XV. | Field blanks | W | FB0406210-R2B (EOD 120488), ZB0428210-R2 C EOD 30059 |

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 | RSAQ3-1BPC | 5 | 11 | 0124370MB | 21 | | 31 |
| 2 | RSAQ3-2BPC | | 12 | | 22 | | 32 |
| 3 | SA169-4BPC | | 13 | | 23 | | 33 |
| 4 | RSAQ3-2BPCMS | | 14 | | 24 | | 34 |
| 5 | RSAQ3-2BPCMSD | | 15 | | 25 | | 35 |
| 6 | | | 16 | | 26 | | 36 |
| 7 | | | 17 | | 27 | | 37 |
| 8 | | | 18 | | 28 | | 38 |
| 9 | | | 19 | | 29 | | 39 |
| 10 | | | 20 | | 30 | | 40 |

Notes: _____

VALIDATION FINDINGS WORKSHEET

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

| | | | | |
|----------------------|------------------------|------------------------|------------------------|----------------|
| A. 2,3,7,8-TCDD | F. 1,2,3,4,6,7,8-HpCDD | K. 1,2,3,4,7,8-HxCDF | P. 1,2,3,4,7,8,9-HpCDF | U. Total HpCDD |
| B. 1,2,3,7,8-PeCDD | G. OCDD | L. 1,2,3,6,7,8-HxCDF | Q. OCDF | V. Total TCDF |
| C. 1,2,3,4,7,8-HxCDD | H. 2,3,7,8-TCDF | M. 2,3,4,6,7,8-HxCDF | R. Total TCDD | W. Total PeCDF |
| D. 1,2,3,6,7,8-HxCDD | I. 1,2,3,7,8-PeCDF | N. 1,2,3,7,8,9-HxCDF | S. Total PeCDD | X. Total HxCDF |
| E. 1,2,3,7,8,9-HxCDD | J. 2,3,4,7,8-PeCDF | O. 1,2,3,4,6,7,8-HpCDF | T. Total HxCDD | Y. Total HpCDF |

Notes:

LDC #: 232652
 SDG #: SEC 2004

VALIDATION FINDINGS WORKSHEET
Internal Standards

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

N/A Are all internal standard recoveries within the 40-135% criteria?

Y N/A Was the S/N ratio all internal standard peaks ≥ 10 ?

| # | Date | Lab ID/Reference | Internal Standard | % Recovery (Limit: 40-135%) | Qualifications (if) |
|---|------|------------------|-------------------|-----------------------------|---------------------|
| | | 1 | A | 32 | ✓ M/P (A-B-F-H-N) |
| | | | B | 35 | |
| | | | C | 36 | |
| | | | D | 37 | |
| | | | E | 38 | |
| | | | H | 36 | |
| | | 2 | A | 37 | ✓ M/P (A-E-H) |
| | | | B | 35 | |
| | | | D | 38 | |
| | | | F | 39 | |
| | | 3 | A | 35 | ✓ M/P (All) |
| | | | B | 37 | |
| | | | C | 35 | |
| | | | D | 30 | |
| | | | E | 32 | |
| | | | F | 31 | |
| | | | H | 22 | |
| | | | I | 12 | |

| | Internal Standards | Check Standard Used | Internal Standards | Check Standard Used |
|----|-----------------------------------|---------------------|--------------------|-------------------------------------|
| A. | ¹³ C-2,3,7,8-TCDF | | G. | ¹³ C-1,2,3,4,6,7,8-HpCDF |
| B. | ¹³ C-2,3,7,8-TCDD | | H. | ¹³ C-1,2,3,4,6,7,8-HpCDD |
| C. | ¹³ C-1,2,3,7,8-PeCDF | | I. | ¹³ C-OCDD |
| D. | ¹³ C-1,2,3,7,8-PeCDD | | K. | ¹³ C-1,2,3,4-TCDD |
| E. | ¹³ C-1,2,3,4,7,8-HxCDF | | L. | ¹³ C-1,2,3,7,8,9-HxCDD |
| F. | ¹³ C-1,2,3,6,7,8-HxCDD | | | |

VALIDATION FINDINGS WORKSHEET
Internal Standards

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)

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

Y N N/A Are all internal standard recoveries within the 40-135% criteria?

Y N N/A Was the S/N ratio all internal standard peaks > 10?

| # | Date | Lab ID/Reference | Internal Standard | % Recovery (Limit: 40-135%) | Qualifications (C1) |
|---|------|------------------|-------------------|-----------------------------|----------------------|
| | | <u>012437MB</u> | A B | <u>36</u> (<u>40-135</u>) | <u>Y/N/A (A,B,F)</u> |
| | | | B D | <u>37</u> () | |
| | | | E | <u>38</u> () | |
| | | | F | <u>33</u> () | |
| | | <u>4 (MS)</u> | A | <u>35</u> () | <u>No Qual</u> |
| | | | B | <u>34</u> () | |
| | | | D | <u>35</u> () | |
| | | | F | <u>38</u> () | |
| | | <u>5 (MSD)</u> | A | <u>37</u> () | |
| | | | B | <u>34</u> () | |
| | | | C | <u>38</u> () | |
| | | | D | <u>34</u> () | |
| | | | E | <u>30</u> () | |
| | | | F | <u>33</u> () | |
| | | | G | <u>27</u> () | |
| | | | H | <u>25</u> () | |
| | | | | <u>12</u> () | <u>Y</u> |

| | Internal Standards | Check Standard Used | Internal Standards | Check Standard Used |
|----|-----------------------------------|---------------------|--------------------|-------------------------------------|
| A. | ¹³ C-2,3,7,8-TCDF | | G. | ¹³ C-1,2,3,4,6,7,8-HpCDF |
| B. | ¹³ C-2,3,7,8-TCDD | | H. | ¹³ C-1,2,3,4,6,7,8-HpCDD |
| C. | ¹³ C-1,2,3,7,8-PeCDF | | I. | ¹³ C-OCDD |
| D. | ¹³ C-1,2,3,7,8-PeCDD | | K. | ¹³ C-1,2,3,4-TCDD |
| E. | ¹³ C-1,2,3,4,7,8-HxCDF | | L. | ¹³ C-1,2,3,7,8,9-HxCDD |
| F. | ¹³ C-1,2,3,6,7,8-HxCDD | | | |

