LABORATORY DATA CONSULTANTS, INC.
7750 El Camino Real, Suite 2L Carlsbad, CA 92009 Phone: 760/634-0437 Fax: 760/634-0439

Northgate Environmental Management, Inc.   July 12, 2010
1100 Quail Street Ste. 102
Newport Beach, CA 92660
ATTN: Ms. Cindy Arnold

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

Dear Ms. Arnold,

Enclosed is the final validation report for the fraction listed below. This SDG was received on July 8, 2010. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 23511:

SDG #	Fraction
137822	Asbestos

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

- Standard Operating Procedures (SOP) 40, Data Review/Validation, BRC 2009

- Quality Assurance Project Plan Tronox LLC Facility, Henderson Nevada, June 2009

- NDEP Guidance, May 2006

- USEPA, Contract Laboratory Program National Functional Guidelines for Inorganic Data Review, October 2004

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

Sincerely,

Erlinda T. Rauto
Operations Manager/Senior Chemist

3 DAY TAT

Stage 2B/4

LDC #23511 (Tronox LLC-Northgate, Henderson NV / Tronox Parcels)

LDC	SDG#	DATE REC'D	(3) DATE DUE	Asb. (540-R-97-028)																																																
Matrix: Water/Soil				W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S
A	137822	07/08/10	07/13/10	0	2																																																
Total	T/LR			0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2

Shaded cells indicate Stage 4 validation (all other cells are Stage 2B validation). These sample counts do not include MS/MSD, and DUPs

23511ST.wpd

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_LDC23511_071250.doc
IV. EDD Delivery				
Was the final EDD sent to the client?	X			

Tronox LLC Facility, PCS, Henderson, Nevada
Data Validation Reports
LDC #23511

Asbestos

LDC

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada

Collection Date: May 13, 2010

LDC Report Date: July 8, 2010

Matrix: Soil

Parameters: Asbestos

Validation Level: Stage 2B

Laboratory: EMS Laboratories

Sample Delivery Group (SDG): 137822

Sample Identification

SSAR6-01-0.00BPC
SA05-0.33BPC

Introduction

This data review covers 2 soil samples listed on the cover sheet. The analyses were per NIOSH Method 7402/ISO for Asbestos.

This review follows the Standard Operating Procedures (SOP) 40, Data Review/Validation (BRC 2009), the Quality Assurance Project Plan Tronox LLC Facility, Henderson, Nevada (June 2009), NDEP guidance (May 2006), and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004).

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section VII.

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

No holding time requirement is specified for asbestos.

No cooler temperature requirement is specified for asbestos.

II. Calibration

A NIST standard reference material containing Chrysotile, Amosite, and Crocidolite asbestos was analyzed. The calibration identified the proper constituents.

III. Blanks

The blank analyses showed no asbestos contamination.

No field blanks were identified in this SDG.

IV. Duplicates

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

V. Sample Result Verification

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 137822	All analytes reported below the PQL.	J (all detects)	A

Raw data were not reviewed for this SDG.

VI. Overall Assessment

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

VII. Field Duplicates

No field duplicates were identified in this SDG.

Tronox LLC Facility, PCS, Henderson, Nevada
Asbestos - Data Qualification Summary - SDG 137822

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
137822	SSAR6-01-0.00BPC SA05-0.33BPC	All analytes reported below the PQL.	J (all detects)	A	Sample result verification (sp)

Tronox LLC Facility, PCS, Henderson, Nevada
Asbestos - Laboratory Blank Data Qualification Summary - SDG 137822

No Sample Data Qualified in this SDG

Tronox LLC Facility, PCS, Henderson, Nevada
Asbestos - Field Blank Data Qualification Summary - SDG 137822

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
Stage 2B

LDC #: 23511A6
SDG #: 137822
Laboratory: EMS Laboratories

Date: 7/8/10
Page: 1 of 1
Reviewer: ω
2nd Reviewer: Q

NIOSH 7402/ISO

METHOD: Asbestos (Draft Modified Elutriator Method adopted from ~~EPA Method 540-R-97-028~~)

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: 5/13/10
II.	Calibration verification	A	
III.	Blanks	A	filter Blan + BB
IV.	Matrix Duplicates	N	client specifies
V.	Sample result verification	N	
VI.	Overall assessment of data	A	
VII.	Field duplicates	N	
VIII.	Field blanks	N	

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

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

D = Duplicate
TB = Trip blank
EB = Equipment blank

Validated Samples: (or)

1	SSAR6-01-0.00BPC	11		21		31	
2	SA05-0.33BPC	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:_____