



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

July 23, 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 July 21, 2010. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 23612:

<u>SDG #</u>	<u>Fraction</u>
091003470, 091003902	Asbestos

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 Inorganic Data Review, October 2004

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

Sincerely,

Erlinda T. Rauto
Operations Manager/Senior Chemist

EDD CHECKLIST

LDC #: 23612
 SDG #: 091003470, 091003902

Page: 1 of 1
 Reviewer: BC
 2nd Reviewer: JE

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_LDC23612_072210.doc
IV. EDD Delivery				
Was the final EDD sent to the client?	X			

Tronox LLC Facility, PCS, Henderson, Nevada
Data Validation Reports
LDC #23612

Asbestos

LDC

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

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

Collection Date: April 14, 2010

LDC Report Date: July 22, 2010

Matrix: Soil

Parameters: Asbestos

Validation Level: Stage 2B

Laboratory: EMSL Analytical, Inc.

Sample Delivery Group (SDG): 091003470

Sample Identification

SSA08-02-0.33BPC

Introduction

This data review covers one soil sample listed on the cover sheet. The analyses were per EPA Method 540-R-97-028 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 091003470	All analytes reported below the PQL.	J (all detects)	A

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 091003470**

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
091003470	SSAO8-02-0.33BPC	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 091003470**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Asbestos - Field Blank Data Qualification Summary - SDG 091003470**

No Sample Data Qualified in this SDG

LDC #: 23612A6
 SDG #: 091003470
 Laboratory: EMSL Analytical, Inc.

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
 Stage 2B

Date: 7/28/00
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

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: 4/14/00
II.	Calibration verification	A	
III.	Blanks	A	filter blank, + 2D
IV.	Matrix Duplicates	N	Client spec fail
V.	Sample result verification	N	
VI.	Overall assessment of data	A	
VII.	Field duplicates	N	
VIII.	Field blanks	N	

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

Validated Samples:

		Soil			
1	SSAO8-02-0.33BPC	11		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: _____

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

Project/Site Name: Tronox LLC Facility, PCS, Henderson, Nevada
Collection Date: April 28, 2010
LDC Report Date: July 22, 2010
Matrix: Soil
Parameters: Asbestos
Validation Level: Stage 2B & 4
Laboratory: EMSL Analytical, Inc.

Sample Delivery Group (SDG): 091003902

Sample Identification

SSAL2-03-0.00BPC**
SSAL2-02-0.00BPC
SSAQ3-01-0.00BPC

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 3 soil samples listed on the cover sheet. The analyses were per EPA Method 540-R-97-028 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.

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

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 sample result verifications were acceptable for samples on which a Stage 4 review was performed.

All analytes reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG 091003902	All analytes reported below the PQL.	J (all detects)	A

The results listed on the final report were verified against the raw data worksheets. The results were transcribed correctly to the final report.

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 091003902**

SDG	Sample	Analyte	Flag	A or P	Reason (Code)
091003902	SSAL2-03-0.00BPC** SSAL2-02-0.00BPC SSAQ3-01-0.00BPC	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 091003902**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS, Henderson, Nevada
Asbestos - Field Blank Data Qualification Summary - SDG 091003902**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B/4

LDC #: 23612B6
 SDG #: 091003902
 Laboratory: EMSL Analytical, Inc.

Date: 7/27/10
 Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

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: 4/28/10
II.	Calibration verification	A	
III.	Blanks	A	filter
IV.	Matrix Duplicates	N	direct samples
V.	Sample result verification	A	Not reviewed for Stage 2B validation.
VI.	Overall assessment of data	A	
VII.	Field duplicates	N	
VIII.	Field blanks	N	

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 Stage 4 validation

1	SSAL2-03-0.00BPC**	11		21		31	
2	SSAL2-02-0.00BPC	12		22		32	
3	SSAQ3-01-0.00BPC	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 #: 23612 Bb
 SDG #: 09/03/90

VALIDATION FINDINGS CHECKLIST

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

Tronox Northgate Henderson Worksheet

Method: Asbestos (EPA Method *See entry*)

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	✓		✓	
Cooler temperature criteria was met.	✓			
II. Calibration				
Were balance checks performed as required?			✓	
Was the flow rate for the IST opening calibrated to 72 ml/min?	✓			
Was the leak check performed?	✓			
Was chrysotile beam dose sensitivity acceptable?	✓			
Was camera constant calibration acceptable?	✓			
Was crocidolite spectrum Na sensitivity acceptable?	✓			
Was Mg-Si K-alpha peak resolvability acceptable?	✓			
Were K factors acceptable?	✓			
Was detector resolution at the Mn K-alpha peak acceptable?	✓			
III. Blanks				
Was a method blank associated with every sample in this SDG?	✓			
Were 4% of unused filter lot blanks analyzed prior to sampling and < 0.2 fiber/mm ² ?	✓			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.	✓			
IV. Matrix Duplicates				
Was a duplicate (DUP) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated DUP.		✓		
Was the duplicate relative percent differences (RPD) ≤ 50%?			✓	
V. Sample Result Verification				
Were RLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	✓			
Were samples prepared in accordance with the Modified Elutriator Method for the Determination of Asbestos in Soil and Bulk Material, Revision 1, Berman and Kolk, May 2000?	✓			
Were the EDXA and SAED photos provided?	✓			
Was the analytical sensitivity greater than 3.00E+06?	✓			
Were asbestos fibers recorded ≥ 5.0 microns in length, 3:1 aspect ratio, and a modified 0.4 micron min. width?	✓			
Was analysis stopped upon recording 25 asbestos fibers ≥ 10 microns in length after current grid opening was completed.	✓			

LDC #: Y3612B6
 SDG #: 09100390 ✓

VALIDATION FINDINGS CHECKLIST

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

Validation Area	Yes	No	NA	Findings/Comments
VI. Overall assessment of data				
Overall assessment of data was found to be acceptable.	✓			
VII. Field duplicates				
Field duplicate pairs were identified in this SDG.		✓		
Target analytes were detected in the field duplicates and RPD ≤ 50%.			✓	
VIII. Field blanks				
Field blanks were identified in this SDG.		✓		
Target analytes were detected in the field blanks.			✓	

LDC #: 23612B6
 SDG #: 09/003902

VALIDATION FINDINGS WORKSHEET

Sample Calculation Verification

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

METHOD: Inorganics, Method See com

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

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

Compound (analyte) results for 1 reported with a positive detect were recalculated and verified using the following equation:

Concentration =

Recalculation:

$$\text{Total Protocol Asbestos} = \frac{4 \times 385}{0.00012 \times 0.0132 \times 82} = 1.19 \times 10^7$$

#	Sample ID	Analyte	Reported Concentration (Str/µm)	Calculated Concentration (Str/µm)	Acceptable (Y/N)
1	1	Asbestos Structures > 10 µm (Long)	2.77	2.77	Y
		Asbestos Structures > 10 µm (Chrys)	2.77	2.77	Y
		Total Protocol Asbestos Structures	3.70	3.20	Y
		Protocol Asbestos Structures (Chrys)	3.70	3.20	Y
2	1	Asbestos Structures > 10 µm (Long)	8.89 E+6	8.89 E+6	Y
		Asbestos Structures > 10 µm (Chrys)	8.89 E+6	8.89 E+6	Y
		Total Protocol Asbestos Structures	1.19 E+7	1.19 E+7	Y
		Protocol Asbestos Structures (Chrys)	1.19 E+7	1.19 E+7	Y

Note: _____

