



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

October 29, 2010

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

Dear Ms. Arnold,

Enclosed are the final validation reports for the fraction listed below. These SDGs were received on October 4, 2010. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 24132:

SDG #

Fraction

G0H240541, G0H260554, G0H270532
G0H270593, G0H310577, G0I010538
G0I030656

Dioxins/Dibenzofurans

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/Dibenzofurans 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 #: 24132
 SDG #: G0H240541, G0H260554, G0H270532, G0H270593
G0H310577, G0I010538, G0I010656

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

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 LDC24132_102710.doc
IV. EDD Delivery				
Was the final EDD sent to the client?	X			

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

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

Collection Date: August 20 through August 23, 2010

LDC Report Date: October 21, 2010

Matrix: Soil/Water

Parameters: Dioxins/Dibenzofurans

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0H240541

Sample Identification

BDT-3-N-20-10BPC	EB-08202010
BDT-3-N-20-12BPC	BDT-3-N-20-10BPCMS
BDT-3-N-20-14BPC	BDT-3-N-20-10BPCMSD
BDT-3-N-20-16BPC	
BDT-3-N-20-18BPC**	
BDT-3-N-20-2BPC	
BDT-3-N-20-4BPC	
BDT-3-N-20-6BPC	
BDT-3-N-20-8BPC	
BDT-3-N-20-8BPC_FD	
BDT-3-N-10-10BPC	
BDT-3-N-10-12BPC	
BDT-3-N-10-14BPC	
BDT-3-N-10-16BPC	
BDT-3-N-10-18BPC**	
BDT-3-N-10-2BPC	
BDT-3-N-10-4BPC	
BDT-3-N-10-4BPC_FD	
BDT-3-N-10-6BPC	
BDT-3-N-10-8BPC	

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 22 soil samples and one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 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.

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 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
0260249-MB	9/1/10	1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-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 OCDF	1.4 pg/L 1.9 pg/L 12 pg/L 120 pg/L 2.5 pg/L 0.85 pg/L 1.5 pg/L 2.7 pg/L 4.2 pg/L 4.4 pg/L	All water samples in SDG G0H240541
0244238-MB	9/1/10	2,3,7,8-TCDD 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 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF	0.033 pg/g 0.082 pg/g 0.13 pg/g 1.2 pg/g 0.044 pg/g 0.037 pg/g 0.10 pg/g 0.062 pg/g 0.11 pg/g	All soil samples in SDG G0H240541

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-08202010	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF	4.2 pg/L 32 pg/L 1.3 pg/L 2.1 pg/L 5.7 pg/L	4.2U pg/L 32U pg/L 1.3U pg/L 2.1U pg/L 5.7U pg/L
BDT-3-N-20-10BPC	2,3,7,8-TCDD	0.13 pg/g	0.13U pg/g
BDT-3-N-20-14BPC	1,2,3,7,8,9-HxCDD	0.20 pg/g	0.20U pg/g
BDT-3-N-20-4BPC	1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD	0.17 pg/g 0.20 pg/g 0.85 pg/g	0.17U pg/g 0.20U pg/g 0.85U pg/g
BDT-3-N-20-6BPC	1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD	0.18 pg/g 0.49 pg/g 1.3 pg/g	0.18U pg/g 0.49U pg/g 1.3U pg/g
BDT-3-N-20-8BPC_FD	OCDD	5.0 pg/g	5.0U pg/g
BDT-3-N-10-10BPC	1,2,3,7,8,9-HxCDD OCDD	0.38 pg/g 5.2 pg/g	0.38U pg/g 5.2U pg/g

Sample	Compound	Reported Concentration	Modified Final Concentration
BDT-3-N-10-12BPC	1,2,3,7,8,9-HxCDD OCDD	0.26 pg/g 2.7 pg/g	0.26U pg/g 2.7U pg/g
BDT-3-N-10-14BPC	1,2,3,7,8,9-HxCDD 1,2,3,4,7,8,9-HpCDF	0.21 pg/g 0.28 pg/g	0.21U pg/g 0.28U pg/g
BDT-3-N-10-16BPC	OCDD	3.7 pg/g	3.7U pg/g
BDT-3-N-10-18BPC**	2,3,7,8-TCDD 1,2,3,7,8,9-HxCDD	0.12 pg/g 0.30 pg/g	0.12U pg/g 0.30U pg/g
BDT-3-N-10-6BPC	OCDD	2.9 pg/g	2.9U pg/g

Sample EB-08202010 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-08202010	8/20/10	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF	4.2 pg/L 32 pg/L 1.3 pg/L 2.1 pg/L 5.7 pg/L	BDT-3-N-20-10BPC BDT-3-N-20-12BPC BDT-3-N-20-14BPC BDT-3-N-20-16BPC BDT-3-N-20-18BPC** BDT-3-N-20-2BPC BDT-3-N-20-4BPC BDT-3-N-20-6BPC BDT-3-N-20-8BPC BDT-3-N-20-8BPC_FD

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 percent recovery (%R) was not within QC limits for one compound, the LCS percent recovery (%R) was within QC limits and no data were qualified.

VII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. The percent recoveries (%R) were within the 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 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 PQLs were within validation criteria with the following exceptions:

Sample	Compound	Finding	Criteria	Flag	A or P
BDT-3-N-20-14BPC BDT-3-N-20-4BPC BDT-3-N-10-14BPC	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 G0H240541	All compounds reported below the PQL.	J (all detects)	A

All compounds reported as EMPC were qualified as follows:

Sample	Compound	Flag	A or P
All samples in SDG G0H240541	All compounds reported by the lab 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 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 BDT-3-N-20-8BPC and BDT-3-N-20-8BPC_FD and samples BDT-3-N-10-4BPC and BDT-3-N-10-4BPC_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
	BDT-3-N-20-8BPC	BDT-3-N-20-8BPC_FD				
2,3,7,8-TCDD	0.42	0.20	-	0.22 (≤ 0.54)	-	-
1,2,3,7,8-PeCDD	1.5	0.70	-	0.8 (≤ 2.7)	-	-
1,2,3,4,7,8-HxCDD	1.1	0.59	-	0.51 (≤ 2.7)	-	-
1,2,3,6,7,8-HxCDD	2.3	1.2	-	1.1 (≤ 2.7)	-	-
1,2,3,7,8,9-HxCDD	1.8	0.83	-	0.97 (≤ 2.7)	-	-
1,2,3,4,6,7,8-HpCDD	8.5	3.8	-	4.7 (≤ 2.7)	J (all detects)	A
OCDD	11	5.0	-	6 (≤ 5.4)	J (all detects)	A
2,3,7,8-TCDF	12	4.4	93 (≤ 50)	-	J (all detects)	A
1,2,3,7,8-PeCDF	20	8.6	-	11.4 (≤ 2.7)	J (all detects)	A
2,3,4,7,8-PeCDF	11	4.5	-	6.5 (≤ 2.7)	J (all detects)	A
1,2,3,4,7,8-HxCDF	33	17	64 (≤ 50)	-	J (all detects)	A
1,2,3,6,7,8-HxCDF	29	13	-	16 (≤ 2.7)	J (all detects)	A
2,3,4,6,7,8-HxCDF	5.7	2.8	-	2.9 (≤ 2.7)	J (all detects)	A

Compound	Concentration (pg/g)		RPD (Limits)	Difference (Limits)	Flags	A or P
	BDT-3-N-20-8BPC	BDT-3-N-20-8BPC_FD				
1,2,3,7,8,9-HxCDF	5.0	2.3	-	2.7 (≤ 2.7)	-	-
1,2,3,4,6,7,8-HpCDF	110	47	80 (≤ 50)	-	J (all detects)	A
1,2,3,4,7,8,9-HpCDF	50	19	90 (≤ 50)	-	J (all detects)	A
OCDF	260	99	90 (≤ 50)	-	J (all detects)	A

Compound	Concentration (pg/g)		RPD (Limits)	Difference (Limits)	Flags	A or P
	BDT-3-N-10-4BPC	BDT-3-N-10-4BPC_FD				
2,3,7,8-TCDD	1.4	1.6	-	0.2 (≤ 0.52)	-	-
1,2,3,7,8-PeCDD	4.4	4.7	-	0.3 (≤ 2.6)	-	-
1,2,3,4,7,8-HxCDD	3.1	3.6	-	0.5 (≤ 2.6)	-	-
1,2,3,6,7,8-HxCDD	6.3	7.3	-	1 (≤ 2.6)	-	-
1,2,3,7,8,9-HxCDD	4.8	6	-	1.2 (≤ 2.6)	-	-
1,2,3,4,6,7,8-HpCDD	21	26	21 (≤ 50)	-	-	-
OCDD	24	29	19 (≤ 50)	-	-	-
2,3,7,8-TCDF	29	35	19 (≤ 50)	-	-	-
1,2,3,7,8-PeCDF	51	68	29 (≤ 50)	-	-	-
2,3,4,7,8-PeCDF	28	35	22 (≤ 50)	-	-	-
1,2,3,4,7,8-HxCDF	95	120	23 (≤ 50)	-	-	-
1,2,3,6,7,8-HxCDF	76	91	18 (≤ 50)	-	-	-
2,3,4,6,7,8-HxCDF	16	20	22 (≤ 50)	-	-	-
1,2,3,7,8,9-HxCDF	13	17	27 (≤ 50)	-	-	-

Compound	Concentration (pg/g)		RPD (Limits)	Difference (Limits)	Flags	A or P
	BDT-3-N-10-4BPC	BDT-3-N-10-4BPC_FD				
1,2,3,4,6,7,8-HpCDF	280	340	19 (≤ 50)	-	-	-
1,2,3,4,7,8,9-HpCDF	100	130	26 (≤ 50)	-	-	-
OCDF	720	890	21 (≤ 50)	-	-	-

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0H240541**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
G0H240541	BDT-3-N-20-14BPC BDT-3-N-20-4BPC BDT-3-N-10-14BPC	2,3,7,8-TCDF	None	P	Project Quantitation Limit (2nd column confirmation) (o)
G0H240541	BDT-3-N-20-10BPC BDT-3-N-20-12BPC BDT-3-N-20-14BPC BDT-3-N-20-16BPC BDT-3-N-20-18BPC** BDT-3-N-20-2BPC BDT-3-N-20-4BPC BDT-3-N-20-6BPC BDT-3-N-20-8BPC BDT-3-N-20-8BPC_FD BDT-3-N-10-10BPC BDT-3-N-10-12BPC BDT-3-N-10-14BPC BDT-3-N-10-16BPC BDT-3-N-10-18BPC** BDT-3-N-10-2BPC BDT-3-N-10-4BPC BDT-3-N-10-4BPC_FD BDT-3-N-10-6BPC BDT-3-N-10-8BPC EB-08202010	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
G0H240541	BDT-3-N-20-10BPC BDT-3-N-20-12BPC BDT-3-N-20-14BPC BDT-3-N-20-16BPC BDT-3-N-20-18BPC** BDT-3-N-20-2BPC BDT-3-N-20-4BPC BDT-3-N-20-6BPC BDT-3-N-20-8BPC BDT-3-N-20-8BPC_FD BDT-3-N-10-10BPC BDT-3-N-10-12BPC BDT-3-N-10-14BPC BDT-3-N-10-16BPC BDT-3-N-10-18BPC** BDT-3-N-10-2BPC BDT-3-N-10-4BPC BDT-3-N-10-4BPC_FD BDT-3-N-10-6BPC BDT-3-N-10-8BPC EB-08202010	All compounds reported by the lab as estimated maximum possible concentration (EMPC)	JK (all detects)	A	Project Quantitation Limit (k)
G0H240541	BDT-3-N-20-8BPC BDT-3-N-20-8BPC_FD	2,3,7,8-TCDF 1,2,3,4,7,8-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)	A	Field duplicates (RPD) (fd)

SDG	Sample	Compound	Flag	A or P	Reason (Code)
G0H240541	BDT-3-N-20-8BPC BDT-3-N-20-8BPC_FD	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF	J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects) J (all detects)	A	Field duplicates (Difference) (fd)

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0H240541**

SDG	Sample	Compound	Modified Final Concentration	A or P	Code
G0H240541	EB-08202010	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF OCDF	4.2U pg/L 32U pg/L 1.3U pg/L 2.1U pg/L 5.7U pg/L	A	bl
G0H240541	BDT-3-N-20-10BPC	2,3,7,8-TCDD	0.13U pg/g	A	bl
G0H240541	BDT-3-N-20-14BPC	1,2,3,7,8,9-HxCDD	0.20U pg/g	A	bl
G0H240541	BDT-3-N-20-4BPC	1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD	0.17U pg/g 0.20U pg/g 0.85U pg/g	A	bl
G0H240541	BDT-3-N-20-6BPC	1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD	0.18U pg/g 0.49U pg/g 1.3U pg/g	A	bl
G0H240541	BDT-3-N-20-8BPC_FD	OCDD	5.0U pg/g	A	bl
G0H240541	BDT-3-N-10-10BPC	1,2,3,7,8,9-HxCDD OCDD	0.38U pg/g 5.2U pg/g	A	bl
G0H240541	BDT-3-N-10-12BPC	1,2,3,7,8,9-HxCDD OCDD	0.26U pg/g 2.7U pg/g	A	bl
G0H240541	BDT-3-N-10-14BPC	1,2,3,7,8,9-HxCDD 1,2,3,4,7,8,9-HpCDF	0.21U pg/g 0.28U pg/g	A	bl
G0H240541	BDT-3-N-10-16BPC	OCDD	3.7U pg/g	A	bl

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B/4

LDC #: 24132A21

SDG #: G0H240541

Laboratory: Test America

Date: 10/20/10

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	Δ	Sampling dates: 8/20 - 8/23/10
II.	HRGC/HRMS Instrument performance check	Δ	
III.	Initial calibration	Δ	
IV.	Routine calibration HEV	Δ	
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	Δ	
X.	Target compound identifications	Δ	Not reviewed for Stage 2B validation.
XI.	Compound quantitation and CRQLs	SW	Not reviewed for Stage 2B validation.
XII.	System performance	Δ	Not reviewed for Stage 2B validation.
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	SW	D = 9 + 10 17 + 18
XV.	Field blanks	SW	EB = 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: ** Indicates sample underwent Stage 4 validation

soil + water

1	BDT-3-N-20-10BPC	11	BDT-3-N-10-10BPC	21	EB-08202010 W	31	0244238-MB
2	BDT-3-N-20-12BPC	12	BDT-3-N-10-12BPC	22	BDT-3-N-20-10BPCMS	32	0260249-MB
3	BDT-3-N-20-14BPC	13	BDT-3-N-10-14BPC	23	BDT-3-N-20-10BPCMSD	33	
4	BDT-3-N-20-16BPC	14	BDT-3-N-10-16BPC	24		34	
5	BDT-3-N-20-18BPC**	15	BDT-3-N-10-18BPC**	25		35	
6	BDT-3-N-20-2BPC	16	BDT-3-N-10-2BPC	26		36	
7	BDT-3-N-20-4BPC	17	BDT-3-N-10-4BPC	27		37	
8	BDT-3-N-20-6BPC	18	BDT-3-N-10-4BPC_FD	28		38	
9	BDT-3-N-20-8BPC	19	BDT-3-N-10-6BPC	29		39	
10	BDT-3-N-20-8BPC_FD	20	BDT-3-N-10-8BPC	30		40	

Notes: _____

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 SDG #: per cover

VALIDATION FINDINGS CHECKLIST

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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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 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"/>	

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VALIDATION FINDINGS CHECKLIST

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VIII. Regional Quality Assurance and Quality Control			
Were performance evaluation (PE) samples performed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Were the performance evaluation (PE) samples within the acceptance limits?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
IX. Internal standards			
Were internal standard recoveries within the 40-135% criteria?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was the minimum S/N ratio of all internal standard peaks ≥ 10 ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did compound spectra contain all characteristic ions listed in the table attached?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was the Ion Abundance Ratio for the two quantitation ions within criteria?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was the signal to noise ratio for each target compound and labeled standard ≥ 2.5 ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the maximum intensity of each specified characteristic ion coincide within ± 2 seconds (includes labeled standards)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>
Was an acceptable lock mass recorded and monitored?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	<input type="checkbox"/>
XII. System performance			
System performance was found to be acceptable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XIII. Overall assessment of data			
Overall assessment of data was found to be acceptable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XIV. Field duplicates			
Field duplicate pairs were identified in this SDG.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Target compounds were detected in the field duplicates.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XV. Field blanks			
Field blanks were identified in this SDG.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Target compounds were detected in the field blanks.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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

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	Compds - Sample-ID	Finding	Associated Samples	Qualifications
			All compounds reported below PQL	All	J/A detects (sp)
			All compounds reported as EMPC	All	JK detects (k)
		H	no second column confirmation was performed	3, 7, 13	none / p (e)

Comments: See sample calculation verification worksheet for recalculations

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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?

(fd)

Compound	Concentration pg/g		%RSD ≤50	(pg/g) Difference	(pg/g) Limits	Qualifications (Parent Only)
	9	10				
A	0.42 *	0.20 *		0.22	≤0.54	
B	1.5	0.70		0.8	≤2.7	
C	1.1 *	0.59		0.51	≤2.7	
D	2.3	1.2		1.1	≤2.7	
E	1.8	0.83 *		0.97	≤2.7	
F	8.5	3.8		4.7	≤2.7	J/A dt
G	11	5.0		6	≤5.4	
H	12	4.4	93			
I	20	8.6		11.4	≤2.7	
J	11	4.5		6.5	≤2.7	
K	33	17	64			
L	29	13		16	≤2.7	
M	5.7	2.8		2.9	≤2.7	↓
N	5.0	2.3		2.7	≤2.7	-
O	110	47	80			J/A dt
P	50	19	90			↓
Q	260	99	90			↓

* EMPC

LDC#: 23906B4

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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METHOD: Metals (EPA Method 6020/7000)

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		%RSD ≤50	(pg/g) Difference	(pg/g) Limits	Qualifications (Parent Only)
	17	18				
A	1.4	1.6		0.2	≤0.52	
B	4.4	4.7 *		0.3	≤2.6	
C	3.1	3.6		0.5	≤2.6	
D	6.3	7.3		1	≤2.6	
E	4.8	6.0		1.2	≤2.6	
F	21	26	21			
G	24	29	19			
H	29	35	19			
I	51	68	29			
J	28	35	22			
K	95	120	23			
L	76	91	18			
M	16	20	22			
N	13	17	27			
O	280	340	19			
P	100	130	26			
Q	720	890	21			

V:\FIELD DUPLICATES\24132A21.wpd

* EMPL

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA 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:

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

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

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Reported		Recalculated		Reported		Recalculated	
				Average RRF (Initial)	Average RRF (std)	Average RRF (Initial)	RRF (std)	Average RRF (Initial)	RRF (std)	%RSD	%RSD
1	ICAL	9/18/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.02408	1.4942	1.02408	1.4942	9.91493	1.4942	9.915	
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	1.189918	1.8451	1.189918	1.8451	4.16239	1.8451	4.162	
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.16375	1.23468	1.16375	1.23468	7.14784	1.23468	7.148	
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.08281	1.16859	1.08281	1.16859	6.58155	1.16859	6.582	
			OCDF (¹³ C-OCDD)	1.57182	1.64541	1.57182	1.64541		1.64541		
2	ICAL DB225	7/26/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.056	1.02	1.056	1.02	3.32	1.02	3.32	
			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	ICAL	8/16/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.00187	1.00395	1.00187	1.00395	4.19465	1.00395	4.19465	
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	1.16617	1.15763	1.16617	1.15763	8.10393	1.15763	8.10393	
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.14627	1.16196	1.14627	1.16196	8.30657	1.16196	8.30657	
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.08646	1.10819	1.08646	1.10819	6.01727	1.10819	6.01727	
			OCDF (¹³ C-OCDD)	1.54052	1.58312	1.54052	1.58312	8.41565	1.58312	8.41565	

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.

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 SDG #: see cont.

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

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 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA Method TO-9A)

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 = $(A_x)(C_{is}) / (A_{is})(C_x)$ RRF = continuing calibration RRF
 A_x = Area of compound, A_{is} = Area of associated internal standard
 C_x = Concentration of compound, C_{is} = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Average RRF (initial)	Reported		Recalculated	
					RRF (CC)	%D	RRF (CC)	%D
1	185E103D5-9	9/18/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.02408	0.99354	3.0	0.99354	3.0
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	1.18998	1.12004	5.9	1.12004	5.9
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.16375	1.09689	5.7	1.09689	5.7
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.08281	1.02240	5.6	1.02240	5.6
			OCDF (¹³ C-OCDD)	1.54183	1.42986	7.3	1.42986	7.3
2	205E105DZ PB225	9/20/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.056	1.15	8.8	1.15	8.8
			2,3,7,8-TCDD (¹³C-2,3,7,8-TCDD)					
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.056	1.15	8.8	1.15	8.8
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.056	1.11	5.5	1.11	5.5
			OCDF (¹³ C-OCDD)	1.54183	1.42986	7.3	1.42986	7.3
3	185E103D5 PB225	9/18/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.02408	1.01068	1.3	1.01068	1.3
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	1.18998	1.13856	4.3	1.13856	4.3
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.16375	1.09310	6.1	1.09310	6.1
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.08281	1.00082	7.6	1.00082	7.6
			OCDF (¹³ C-OCDD)	1.54183	1.39547	9.5	1.39547	9.5

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.

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SDG #: per con

VALIDATION FINDINGS WORKSHEET

Matrix Spike/Matrix Spike Duplicates Results Verification

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Reviewer: F7

2nd Reviewer: [Signature]

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 = $100 * MSR - MSDR | * 2 / (MSR + MSDR)$

MSR = Matrix spike percent recovery MSDR = Matrix spike duplicate percent recovery

MS/MSD samples: 22 + 23

Compound	Spike Added (pg)		Sample Concentration (pg/g)		Spiked Sample Concentration (pg/g)		Matrix Spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		Reported	Recalculated
	MS	MSD	MS	MSD	MS	MSD	Reported	Recalc.	Reported	Recalc.	RPD	RPD
2,3,7,8-TCDD	20.9	21.1	0.13		21.9	22.3	104	104	105	105	2.1	2.1
1,2,3,7,8-PeCDD	104	106	1.2		112	112	107	107	105	105	0	0
1,2,3,4,7,8-HxCDD	104	106	1.1		107	116	102	102	109	109	8.0	8.0
1,2,3,4,7,8,9-HpCDF	104	106	2.2		120	133	93	93	105	105	11	11
OCDF	209	211	110		260	313	70	70	94	94	18	18

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

RPD = $100 \cdot \text{LCS} - \text{LCS}D \cdot 2 / (\text{LCS} + \text{LCS}D)$ LCS = Laboratory control sample percent recovery
 LCS D = Laboratory control sample duplicate percent recovery

LCS ID: 024423B-LCS

Compound	Spike Added (231g)		Spiked Sample Concentration (1231g)		LCS		LCS D		LCS		LCS D	
	LCS	LCS D	LCS	LCS D	Reported	Recalc	Reported	Recalc	Reported	Recalc	Reported	Recalc
2,3,7,8-TCDD	200	NA	214	NA	107	107						
1,2,3,7,8-PeCDD	100		110		110	110						
1,2,3,4,7,8-HxCDD	100		104		104	104						
1,2,3,4,7,8,9-HpCDF	100		105		105	105						
OCDF	200		216		108	108	NA					

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.

Ions Monitored for HRGC/HRMS Analysis of PCDDs/PCDFs

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 ₄ O	TCDF	4	407.7818	M+2	C ₁₂ H ₃₅ Cl ₃ ³⁷ ClO	HpCDF		
	305.8987	M+2	C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₁₀	TCDF		409.7788	M+4	C ₁₂ H ₃₅ Cl ₅ ³⁷ Cl ₂ O	HpCDF		
	315.9419	M	¹³ C ₁₂ H ₄ ³⁵ Cl ₄ O	TCDF (S)		417.8250	M	¹³ C ₁₂ H ₃₅ Cl ₇ 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 ₃₅ Cl ₆ ³⁷ ClO	HpCDF		
	319.8965	M	C ₁₂ H ₄ ³⁵ Cl ₄ O ₂	TCDD		423.7767	M+2	C ₁₂ H ₃₅ Cl ₆ 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 ₃₅ Cl ₅ ³⁷ ClO ₂	HpCDD		
	331.9368	M	¹³ C ₁₂ H ₄ ³⁵ Cl ₄ O ₂	TCDD (S)		435.8169	M+2	¹³ C ₁₂ H ₃₅ Cl ₆ ³⁷ ClO ₂	HpCDD (S)		
	333.9338	M+2	C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂	TCDD (S)		437.8140	M+4	¹³ C ₁₂ H ₃₅ Cl ₅ 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 ₃₅ Cl ₇ ³⁷ Cl ₂ O	HxCDFE		
	[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 ₄ 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	¹³ 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		¹³ 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 ₉ 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 ₆ ³⁷ ClO	HxCDFE							
[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 ₆ 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 ₆ ³⁷ Cl ₂ O	OCDFE							
	[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 Additional Sampling,
Henderson, Nevada

Collection Date: August 24, 2010

LDC Report Date: October 21, 2010

Matrix: Soil/Water

Parameters: Dioxins/Dibenzofurans

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0H260554

Sample Identification

BDT-3-S-10-10BPC
BDT-3-S-10-12BPC
BDT-3-S-10-14BPC
BDT-3-S-10-16BPC
BDT-3-S-10-18BPC**
BDT-3-S-10-2BPC
BDT-3-S-10-4BPC
BDT-3-S-10-4BPC_FD
BDT-3-S-10-6BPC
BDT-3-S-10-8BPC
BDT-3-S-5-10BPC
BDT-3-S-5-12BPC
BDT-3-S-5-14BPC
BDT-3-S-5-16BPC
BDT-3-S-5-18BPC**
BDT-3-S-5-2BPC
BDT-3-S-5-4BPC
BDT-3-S-5-6BPC
BDT-3-S-5-8BPC
BDT-3-S-5-2BPCMS
BDT-3-S-5-2BPCMSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 21 soil samples and one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 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.

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 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
0251344-MB	9/8/10	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 1,2,3,4,7,8-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	0.041 pg/g 0.050 pg/g 0.048 pg/g 0.45 pg/g 0.32 pg/g 0.041 pg/g 0.079 pg/g 0.072 pg/g 0.045 pg/g 0.052 pg/g 0.11 pg/g 0.075 pg/g 11 pg/g	All soil samples in SDG G0H260554

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

No field blanks were identified in this SDG.

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) were not within QC limits for several compounds, the 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. The percent recoveries (%R) were within the 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
BDT-3-S-10-10BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	33 (40-135) 24 (40-135) 30 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-3-S-10-12BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	31 (40-135) 21 (40-135) 29 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-3-S-10-14BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	37 (40-135) 28 (40-135) 35 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-3-S-10-16BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	36 (40-135) 27 (40-135) 32 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-3-S-10-4BPC	¹³ C-1,2,3,4,6,7,8-HpCDF	25 (40-135)	1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
BDT-3-S-10-4BPC_FD	¹³ C-1,2,3,4,6,7,8-HpCDF	31 (40-135)	1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
BDT-3-S-10-6BPC	¹³ C-1,2,3,4,6,7,8-HpCDF	33 (40-135)	1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
BDT-3-S-10-8BPC	¹³ C-1,2,3,4,6,7,8-HpCDF	30 (40-135)	1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
BDT-3-S-5-10BPC	¹³ C-1,2,3,4,6,7,8-HpCDF	33 (40-135)	1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P

Sample	Internal Standards	%R (Limits)	Compound	Flag	A or P
BDT-3-S-5-12BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	37 (40-135) 22 (40-135) 37 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-3-S-5-14BPC	¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	30 (40-135) 38 (40-135)	OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-3-S-5-16BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	38 (40-135) 25 (40-135) 36 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-3-S-5-4BPC	¹³ C-OCDD	29 (40-135)	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
BDT-3-S-5-6BPC	¹³ C-OCDD	21 (40-135)	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
BDT-3-S-5-8BPC	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 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 PQLs were within validation criteria with the following exceptions:

Sample	Compound	Finding	Criteria	Flag	A or P
BDT-3-S-10-2BPC	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
BDT-3-S-10-6BPC	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
BDT-3-S-10-4BPC	OCDF	Sample result exceeded calibration range.	Reported result should be within calibration range.	J (all detects)	P
BDT-3-S-5-10BPC	2,3,7,8-TCDF 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)	P
BDT-3-S-5-12BPC	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 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) J (all detects) J (all detects)	P
BDT-3-S-5-16BPC	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 G0H260554	All compounds reported below the PQL	J (all detects)	A

All compounds reported as EMPC were qualified as follows:

Sample	Compound	Flag	A or P
All samples in SDG G0H260554	All compounds reported by the lab 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 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 BDT-3-S-10-4BPC and BDT-3-S-10-4BPC_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
	BDT-3-S-10-4BPC	BDT-3-S-10-4BPC_FD				
2,3,7,8-TCDD	3.9	4.4	12 (≤ 50)	-	-	-
1,2,3,7,8-PeCDD	18	15	18 (≤ 50)	-	-	-
1,2,3,4,7,8-HxCDD	15	11	-	4 (≤ 2.6)	J (all detects)	A
1,2,3,6,7,8-HxCDD	24	17	34 (≤ 50)	-	-	-
1,2,3,7,8,9-HxCDD	21	15	33 (≤ 50)	-	-	-
1,2,3,4,6,7,8-HpCDD	71	51	33 (≤ 50)	-	-	-
OCDD	66	48	32 (≤ 50)	-	-	-
2,3,7,8-TCDF	100	120	18 (≤ 50)	-	-	-
1,2,3,7,8-PeCDF	220	190	15 (≤ 50)	-	-	-

Compound	Concentration (pg/g)		RPD (Limits)	Difference (Limits)	Flags	A or P
	BDT-3-S-10-4BPC	BDT-3-S-10-4BPC_FD				
2,3,4,7,8-PeCDF	110	97	13 (≤ 50)	-	-	-
1,2,3,4,7,8-HxCDF	400	310	25 (≤ 50)	-	-	-
1,2,3,6,7,8-HxCDF	250	190	27 (≤ 50)	-	-	-
2,3,4,6,7,8-HxCDF	50	39	25 (≤ 50)	-	-	-
1,2,3,7,8,9-HxCDF	47	31	41 (≤ 50)	-	-	-
1,2,3,4,6,7,8-HpCDF	940	710	28 (≤ 50)	-	-	-
1,2,3,4,7,8,9-HpCDF	470	350	29 (≤ 50)	-	-	-
OCDF	2500	1800	33 (≤ 50)	-	-	-

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0H260554**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
G0H260554	BDT-3-S-10-10BPC BDT-3-S-10-12BPC BDT-3-S-10-14BPC BDT-3-S-10-16BPC BDT-3-S-5-12BPC BDT-3-S-5-16BPC	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H260554	BDT-3-S-10-4BPC BDT-3-S-10-4BPC_FD BDT-3-S-10-6BPC BDT-3-S-10-8BPC BDT-3-S-5-10BPC	1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H260554	BDT-3-S-5-14BPC	OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H260554	BDT-3-S-5-4BPC BDT-3-S-5-6BPC BDT-3-S-5-8BPC	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H260554	BDT-3-S-10-2BPC	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 (exceeded range) (e)
G0H260554	BDT-3-S-10-6BPC	2,3,7,8-TCDF 1,2,3,4,6,7,8-HpCDF OCDF	J (all detects) J (all detects) J (all detects)	P	Project Quantitation Limit (exceeded range) (e)
G0H260554	BDT-3-S-10-4BPC	OCDF	J (all detects)	P	Project Quantitation Limit (exceeded range) (e)
G0H260554	BDT-3-S-5-10BPC	2,3,7,8-TCDF 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 (exceeded range) (e)

SDG	Sample	Compound	Flag	A or P	Reason (Code)
G0H260554	BDT-3-S-5-12BPC	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 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) J (all detects) J (all detects)	P	Project Quantitation Limit (exceeded range) (e)
G0H260554	BDT-3-S-5-16BPC	2,3,7,8-TCDF 1,2,3,4,6,7,8-HpCDF OCDF	J (all detects) J (all detects) J (all detects)	P	Project Quantitation Limit (exceeded range) (e)
G0H260554	BDT-3-S-10-10BPC BDT-3-S-10-12BPC BDT-3-S-10-14BPC BDT-3-S-10-16BPC BDT-3-S-10-18BPC** BDT-3-S-10-2BPC BDT-3-S-10-4BPC BDT-3-S-10-4BPC_FD BDT-3-S-10-6BPC BDT-3-S-10-8BPC BDT-3-S-5-10BPC BDT-3-S-5-12BPC BDT-3-S-5-14BPC BDT-3-S-5-16BPC BDT-3-S-5-18BPC** BDT-3-S-5-2BPC BDT-3-S-5-4BPC BDT-3-S-5-6BPC BDT-3-S-5-8BPC	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
G0H260554	BDT-3-S-10-10BPC BDT-3-S-10-12BPC BDT-3-S-10-14BPC BDT-3-S-10-16BPC BDT-3-S-10-18BPC** BDT-3-S-10-2BPC BDT-3-S-10-4BPC BDT-3-S-10-4BPC_FD BDT-3-S-10-6BPC BDT-3-S-10-8BPC BDT-3-S-5-10BPC BDT-3-S-5-12BPC BDT-3-S-5-14BPC BDT-3-S-5-16BPC BDT-3-S-5-18BPC** BDT-3-S-5-2BPC BDT-3-S-5-4BPC BDT-3-S-5-6BPC BDT-3-S-5-8BPC	All compounds reported by the lab as estimated maximum possible concentration (EMPC)	JK (all detects)	A	Project Quantitation Limit (k)
G0H260554	BDT-3-S-10-4BPC BDT-3-S-10-4BPC_FD	1,2,3,4,7,8-HxCDD	J (all detects)	A	Field duplicates (Difference) (fd)

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0H260554**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0H260554**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
 Stage 2B/4

LDC #: 24132B21
 SDG #: G0H260554
 Laboratory: Test America

Date: 10/20/10
 Page: 1 of 1
 Reviewer: A
 2nd Reviewer: W

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: 8/24/10
II.	HRGC/HRMS Instrument performance check	A	
III.	Initial calibration	A	
IV.	Routine calibration/ REV	A	
V.	Blanks	SW	
VI.	Matrix spike/Matrix spike duplicates	SW	
VII.	Laboratory control samples	A	KS
VIII.	Regional quality assurance and quality control	N	
IX.	Internal standards	SW	
X.	Target compound identifications	A	Not reviewed for Stage 2B validation.
XI.	Compound quantitation and CRQLs	SW	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	SW	D = 7, 8
XV.	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

SOIL

1	BDT-3-S-10-10BPC	11	BDT-3-S-5-10BPC	21	BDT-3-S-5-2BPCMSD	31	0251345 - MB
2	BDT-3-S-10-12BPC	12	BDT-3-S-5-12BPC	22		32	
3	BDT-3-S-10-14BPC	13	BDT-3-S-5-14BPC	23		33	
4	BDT-3-S-10-16BPC	14	BDT-3-S-5-16BPC	24		34	
5	BDT-3-S-10-18BPC**	15	BDT-3-S-5-18BPC**	25		35	
6	BDT-3-S-10-2BPC	16	BDT-3-S-5-2BPC	26		36	
7	BDT-3-S-10-4BPC D	17	BDT-3-S-5-4BPC	27		37	
8	BDT-3-S-10-4BPC_FD D	18	BDT-3-S-5-6BPC	28		38	
9	BDT-3-S-10-6BPC	19	BDT-3-S-5-8BPC	29		39	
10	BDT-3-S-10-8BPC	20	BDT-3-S-5-2BPCMS	30		40	

Notes: _____

LDC #: 24132B21
 SDG #: per cones

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 < 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) ≤ 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) ≤ 20% for unlabeled standards and ≤ 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"/>	

LDC #: 24132B21
 SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Page: 2 of 2
 Reviewer: A
 2nd Reviewer: ✓

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 PCDF 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:

24132-B21

MATRIX/MATRIX SPIKE DATA REPORT
Trace Level Organic Compounds

Client Lot # ...: G0H260554 Work Order # ...: L56WH1AD-MS Matrix: SOLID
 OS Lot-Sample# : G0H260554 - 016 L56WH1AE-MSD
 Prep Date: 09/08/10 Analysis Date ..: 09/23/10
 Prep Batch # ...: 0251345
 Dilution Factor : 0.96
 Analyst ID.....: Lisa L. Hernandez Instrument ID..: 4D5 Method.....: SW846 8290
 Initial Wgt/Vol: 10.19 g

PARAMETER	SAMPLE AMOUNT	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS
2,3,7,8-TCDD	12	20.6	25.3	pg/g	66 a	(77 - 130)		
	12	21.0	25.9	pg/g	68 a	(77 - 130)	2.1	(0 - 30)
1,2,3,7,8-PeCDD	47	103	118	pg/g	69 a	(79 - 134)		
	47	105	117	pg/g	67 a	(79 - 134)	0.72	(0 - 29)
1,2,3,4,7,8-HxCDD	40	103	104	pg/g	63 a B	(65 - 144)		
	40	105	107	pg/g	64 a B	(65 - 144)	3.0	(0 - 36)
1,2,3,6,7,8-HxCDD	66	103	116	pg/g	49 a B	(73 - 147)		
	66	105	135	pg/g	66 a B	(73 - 147)	15	(0 - 36)
1,2,3,7,8,9-HxCDD	60	103	104	pg/g	43 a B	(80 - 143)		
	60	105	112	pg/g	50 a B	(80 - 143)	7.3	(0 - 31)
1,2,3,4,6,7,8-HpCDD	220	103	201	pg/g	0.0 a B	(86 - 134)		
	220	105	203	pg/g	0.0 a B	(86 - 134)	0.0	(0 - 28)
OCDD	220	206	281	pg/g	28 a B	(80 - 137)		
	220	210	290	pg/g	32 a B	(80 - 137)	3.2	(0 - 32)
2,3,7,8-TCDF	300	20.6	178	pg/g	0.0 a B CON	(79 - 137)		
	300	21.0	174	pg/g	0.0 a B CON	(79 - 137)	0.0	(0 - 30)
1,2,3,7,8-PeCDF	540	103	385	pg/g	0.0 a	(81 - 134)		
	540	105	366	pg/g	0.0 a	(81 - 134)	0.0	(0 - 27)
2,3,4,7,8-PeCDF	300	103	237	pg/g	0.0 a	(76 - 132)		
	300	105	218	pg/g	0.0 a	(76 - 132)	0.0	(0 - 31)
1,2,3,4,7,8-HxCDF	1100	103	694	pg/g	0.0 a G B	(72 - 140)		
	1100	105	724	pg/g	0.0 a G B	(72 - 140)	0.0	(0 - 32)
1,2,3,6,7,8-HxCDF	700	103	494	pg/g	0.0 a G B	(63 - 152)		
	700	105	474	pg/g	0.0 a G B	(63 - 152)	0.0	(0 - 38)
2,3,4,6,7,8-HxCDF	130	103	181	pg/g	50 a G B	(72 - 151)		
	130	105	164	pg/g	32 a G B	(72 - 151)	10	(0 - 35)
1,2,3,7,8,9-HxCDF	140	103	170	pg/g	31 a G B	(72 - 152)		
	140	105	161	pg/g	22 a G B	(72 - 152)	5.8	(0 - 36)
1,2,3,4,6,7,8-HpCDF	3000	103	1600	pg/g	0.0 a E B	(81 - 137)		
	3000	105	1550	pg/g	0.0 a E B	(81 - 137)	0.0	(0 - 33)
1,2,3,4,7,8,9-HpCDF	1400	103	878	pg/g	0.0 a B	(79 - 139)		
	1400	105	784	pg/g	0.0 a B	(79 - 139)	0.0	(0 - 35)
OCDF	10000	206	4310	pg/g	0.0 a E B	(75 - 141)		
	10000	210	4340	pg/g	0.0 a E B	(75 - 141)	0.0	(0 - 45)

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".

X 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 \geq 10?

#	Date	Lab ID/Reference	Internal Standard	% Recovery (Limit: 40-135%)	Qualifications
		20	I	29 (40-135)	no equal MS
		21	I	29 (40-135)	no equal MS
		1	H	33 ()	J/W/P QUAL F (i)
			I	24 ()	G, Q (i)
			G	30 ()	R, P (i)
		2	H	31 ()	
			I	21 ()	
			G	29 ()	
		3	H	37 ()	
			I	28 ()	
			G	35 ()	
		4		36 ()	
				27 ()	
				32 ()	✓

Internal Standards	Check Standard Used	Recovery Standards	Check Standard Used
A. ¹³ C-2,3,7,8-TCDF		K. ¹³ C-1,2,3,4-TCDD	
B. ¹³ C-2,3,7,8-TCDD		L. ¹³ C-1,2,3,7,8,9-HxCDD	
C. ¹³ C-1,2,3,7,8-PeCDF		M. ¹³ C-1,2,3,7,8,9-HxCDD	
D. ¹³ C-1,2,3,7,8-PeCDD		N. ¹³ C-1,2,3,7,8,9-HxCDD	
E. ¹³ C-1,2,3,6,7,8-HxCDF		O. ¹³ C-1,2,3,6,7,8-HxCDD	
F. ¹³ C-1,2,3,6,7,8-HxCDD		P. ¹³ C-1,2,3,4,6,7,8-HpCDF	
G. ¹³ C-1,2,3,4,6,7,8-HpCDD		Q. ¹³ C-1,2,3,4,6,7,8-HpCDD	
H. ¹³ C-1,2,3,4,6,7,8-HpCDD		R. ¹³ C-1,2,3,4,6,7,8-HpCDD	
I. ¹³ C-OCDD		T. ¹³ C-OCDD	

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".

X (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 ?

(i)

#	Date	Lab ID/Reference	Internal Standard	% Recovery (Limit: 40-135%)	Qualifications
		7	G	25 (40-135)	J/W P QUAL G,P (i)
		8	G	31 ()	
		9	G	33 ()	
		10	G	30 ()	
		11	G	33 ()	✓
		12	H	37 ()	QUAL F (i)
			I	22 ()	QUAL G,Q
			G	37 ()	G,P
		13	I	30 ()	QUAL G,Q (i)
			G	38 ()	G,P
		14	H	38 ()	F (i)
			I	25 ()	G,Q
			G	36 ()	G,P
					✓
Internal Standards			Check Standard Used	Recovery Standards	Check Standard Used
A.	¹³ C-2,3,7,8-TCDF			K.	¹³ C-1,2,3,4-TCDD
B.	¹³ C-2,3,7,8-TCDD			L.	
C.	¹³ C-1,2,3,7,8-PeCDF			M.	¹³ C-1,2,3,7,8,9-HxCDD
D.	¹³ C-1,2,3,7,8-PeCDD			N.	
E.	¹³ C-1,2,3,6,7,8-HxCDF			O.	
F.	¹³ C-1,2,3,6,7,8-HxCDD			P.	
G.	¹³ C-1,2,3,4,6,7,8-HpCDF			Q.	
H.	¹³ C-1,2,3,4,6,7,8-HpCDD			R.	
I.	¹³ C-OCDD			T.	

LDC#:24132B21

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Page: 1 of 1
Reviewer: _____
2nd Reviewer: _____

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?

(fd)

Compound	Concentration (pg/g)		%RSD ≤50	(pg/g) Difference	(pg/g) Limits	Qualifications (Parent Only)
	7	8				
A	3.9	4.4	12			
B	18	15	18			
C	15	11		4	≤2.6	J/A dit
D	24	17	34			
E	21	15	33			
F	71	51	33			
G	66	48	32			
H	100	120	18			
I	220	190	15			
J	110	97	13			
K	400	310	25			
L	250	190	27			
M	50	39	25			
N	47	31	41			
O	940	710	28			
P	470	350	29			
Q	2500	1800	33			

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

LDC #: 24/30B2
 SDG #: see cont

Page: 1 of 1
 Reviewer: F7
 2nd Reviewer: W

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA 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)	Reported		Recalculated		Reported		Recalculated	
				Average RRF (initial)	%RSD	Average RRF (initial)	%RSD	RRF (std)	%RSD	RRF (std)	%RSD
1	ICAL DB225	7/26/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.056		1.056		1.020	3.32	1.020	3.32
			2,3,7,8-TCDD (¹³C-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)								
2	ICAL	7/21/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	0.995		0.995		0.9849	3.68	0.9849	3.68
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	0.983		0.983		0.9681	3.24	0.9681	3.24
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.163		1.163		1.1014	4.85	1.1014	5.17
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.072		1.072		1.0735	2.6	1.0735	2.6
			OCDF (¹³ C-OCDF)	1.370		1.370		1.3500	1.35	1.3500	1.35
3	ICAL	9/14/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	0.984		0.984		1.05	11.8	1.05	11.8
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	1.032		1.032		1.06	10.8	1.06	10.8
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.14		1.14		1.25	12.7	1.25	12.7
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.134		1.134		1.26	12.3	1.26	12.3
			OCDF (¹³ C-OCDF)	2.118		2.118		1.36	15.3	1.36	15.3

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

LDC #: 24132 B21
 SDG #: see coms

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

Page: 1 of 1
 Reviewer: F7
 2nd Reviewer: R

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA Method TO-9A)

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 = $(A_x)(C_{is}) / (A_{is})(C_x)$ RRF = continuing calibration RRF
 A_x = Area of compound, A_{is} = Area of associated internal standard
 C_x = Concentration of compound, C_{is} = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Average RRF (initial)	Reported		Recalculated	
					RRF (CC)	%D	RRF (CC)	%D
1	cen DB225	9/23/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.056	1.07	1.07	1.5	1.5
	15:02		2,3,7,8-TCDD (¹³C-2,3,7,8-TCDD)					
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)					
2	cen DB225	9/22/10	1,2,3,4,6,7,8-HpCDD (¹³C-1,2,4,6,7,8-HpCDD)	1.056	1.11	1.11	5.3	5.3
	21:25		OCDF (¹³C-OCDF)					
	cen DB5	9/22/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	0.995	0.98	0.98	1.2	1.2
	19:43		2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	0.983	1.01	1.01	2.8	2.8
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.163	1.30	1.30	5.8	5.8
3	cen DB5	9/22/10	1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.072	1.13	1.13	5.7	5.7
	10:03		OCDF (¹³ C-OCDF)	1.370	1.47	1.47	7.0	7.0
			2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)		1.01	1.01	1.2	1.2
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)		1.02	1.02	3.9	3.9
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)		1.21	1.21	4.2	4.2
		1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)		1.09	1.09	2.1	2.1	
		OCDF (¹³ C-OCDF)		1.50	1.50	9.2	9.2	

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 #: 24/32B21

SDG #: per con

VALIDATION FINDINGS WORKSHEET

Matrix Spike/Matrix Spike Duplicates Results Verification

Page: 1 of 1

Reviewer: F7

2nd Reviewer: [Signature]

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 = $100 * MSR - MSDR$ MSR = Matrix spike percent recovery MSDR = Matrix spike duplicate percent recovery

MS/MSD samples: 20 & 21

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	20.6	21.0	12	25.3	25.9	66	66	68	68	2.1	2.1
1,2,3,7,8-PeCDD	103	105	47	118	117	69	69	67	67	0.72	0.72
1,2,3,4,7,8-HxCDD	103	105	40	104	107	63	63	64	64	3.0	3.0
1,2,3,4,7,8,9-HpCDF	103	105	1400	878	784	0	0	0	0	0	0
OCDF	206	210	10000	4310	4340	0	0	0	0	0	0

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

LDC #: 24/30B2/
 SDG #: for only

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: 025 1345-103

Compound	Spike Added (<u>100</u>)		Spiked Sample Concentration (<u>100</u>)		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	18.3	NA	92	92	92	92						
1,2,3,7,8-PeCDD	100		93.5		94	94	94	94						
1,2,3,4,7,8-HxCDD	100		88.7		89	89	89	89						
1,2,3,4,7,8,9-HpCDF	100		98.6		99	99	99	99						
OCDF	200		182		91	91	91	91	NA	NA				

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.

Ions Monitored for HRGC/HRMS Analysis of PCDDs/PCDFs

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 ₃₅ Cl ₆ ³⁷ ClO	HpCDF		
	305.8987	M+2	C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ C10	TCDF		409.7788	M+4	C ₁₂ H ₃₅ Cl ₅ ³⁷ Cl ₂ O	HpCDF		
	315.9419	M	¹³ C ₁₂ H ₄ ³⁵ Cl ₂ O	TCDF (S)		417.8250	M	¹³ C ₁₂ H ₃₅ Cl ₇ O	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 ₆ ³⁷ ClO	HpCDF		
	319.8965	M	C ₁₂ H ₄ ³⁵ Cl ₄ O ₂	TCDD		423.7767	M+2	C ₁₂ H ₃₅ Cl ₅ ³⁷ ClO ₂	HpCDD		
	321.8936	M+2	C ₁₂ H ₄ ³⁵ Cl ₅ ³⁷ C10 ₂	TCDD		425.7737	M+2	C ₁₂ H ₃₅ Cl ₆ ³⁷ ClO ₂	HpCDD		
	331.9368	M	¹³ C ₁₂ H ₄ ³⁵ Cl ₄ O ₂	TCDD (S)		435.8169	M+4	¹³ C ₁₂ H ₃₅ Cl ₅ ³⁷ ClO ₂	HpCDD (S)		
	333.9338	M+2	¹³ C ₁₂ H ₄ ³⁵ Cl ₅ ³⁷ ClO ₂	TCDD (S)		437.8140	M+2	¹³ C ₁₂ H ₃₅ Cl ₆ ³⁷ ClO ₂	HpCDD (S)		
	375.8364	M+2	C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO	HxCDFPE		479.7165	M+4	C ₁₂ H ₃₅ Cl ₅ ³⁷ ClO ₂	HpCDD (S)		
	[354.9792]	LOCK	C ₉ F ₁₃	PFK		[430.9728]	LOCK	C ₉ F ₁₇	NCDPE		
											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 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 ₄ ³⁷ C10	PeCDF (S)	457.7377	M+2		¹³ C ₁₂ ³⁵ Cl ₅ 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		¹³ C ₁₂ ³⁵ Cl ₆ ³⁷ Cl ₂ O	OCDD		
355.8546		M+2	C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO ₂	PeCDD	469.7780	M+2		C ₁₂ ³⁵ Cl ₅ ³⁷ ClO ₂	OCDD		
357.8516		M+4	¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂	PeCDD	471.7750	M+4		¹³ C ₁₂ ³⁵ Cl ₆ ³⁷ ClO ₂	OCDD (S)		
367.8949		M+2	C ₁₂ H ₃ ³⁵ Cl ₄ ³⁷ ClO ₂	PeCDD (S)	513.6775	M+4		C ₁₂ ³⁵ Cl ₅ ³⁷ ClO ₂	OCDD (S)		
369.8919		M+4	¹³ C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ Cl ₂ O ₂	PeCDD (S)	[422.9278]	M+4		C ₁₂ ³⁵ Cl ₆ ³⁷ Cl ₂ O	DCDPE		
409.7974		M+2	C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO	HpCDPE		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 ₆ ³⁷ ClO	HxCDF (S)							
	389.8156	M+2	C ₁₂ H ₂ ³⁵ Cl ₅ ³⁷ ClO ₂	HxCDD							
	391.8127	M+4	¹³ C ₁₂ H ₂ ³⁵ Cl ₄ ³⁷ ClO ₂	HxCDD							
	401.8559	M+2	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 ClO ₂	HxCDD (S)							
	445.7555	M+4	C ₁₂ H ₂ ³⁵ Cl ₃ ³⁷ Cl ₂ O	OCDFPE							
	[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 Additional Sampling,
Henderson, Nevada

Collection Date: August 25, 2010

LDC Report Date: October 24, 2010

Matrix: Soil/Water

Parameters: Dioxins/Dibenzofurans

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0H270532

Sample Identification

BDT-2-N-10-10BPC
BDT-2-N-10-12BPC
BDT-2-N-10-14BPC
BDT-2-N-10-2BPC
BDT-2-N-10-4BPC
BDT-2-N-10-6BPC
BDT-2-N-10-8BPC
BDT-2-N-10-6BPC_FD
BDT-2-N-5-10BPC
BDT-2-N-5-12BPC
BDT-2-N-5-14BPC**
BDT-2-N-5-12BPC_FD
BDT-2-N-5-8BPC
BDT-2-N-5-2BPC
BDT-2-N-5-4BPC
BDT-2-N-5-6BPC
BDT-2-N-10-10BPCMS
BDT-2-N-10-10BPCMSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 18 soil samples and one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 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.

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 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
0252329-MB	9/9/10	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 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	0.11 pg/g 0.15 pg/g 0.14 pg/g 0.29 pg/g 1.6 pg/g 0.21 pg/g 0.23 pg/g 0.35 pg/g 0.24 pg/g 0.13 pg/g 0.16 pg/g 0.48 pg/g 0.27 pg/g 1.0 pg/g	All soil samples in SDG GOH270532

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
BDT-2-N-10-10BPC	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 2,3,4,6,7,8-HxCDF	0.17 pg/g 0.15 pg/g 0.18 pg/g 0.86 pg/g 5.8 pg/g 0.67 pg/g 1.0 pg/g 0.33 pg/g	0.17U pg/g 0.15U pg/g 0.18U pg/g 0.86U pg/g 5.8U pg/g 0.67U pg/g 1.0U pg/g 0.33U pg/g
BDT-2-N-5-10BPC	1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8,9-HxCDF	0.40 pg/g 0.47 pg/g 1.2 pg/g 2.7 pg/g 0.71 pg/g	0.40U pg/g 0.47U pg/g 1.2U pg/g 2.7U pg/g 0.71U pg/g
BDT-2-N-5-12BPC	1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD OCDD	0.25 pg/g 0.61 pg/g 3.8 pg/g	0.25U pg/g 0.61U pg/g 3.8U pg/g
BDT-2-N-5-12BPC_FD	1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF	0.54 pg/g 0.47 pg/g 1.2 pg/g 3.3 pg/g 0.36 pg/g 0.69 pg/g	0.54U pg/g 0.47U pg/g 1.2U pg/g 3.3U pg/g 0.36U pg/g 0.69U pg/g

Sample	Compound	Reported Concentration	Modified Final Concentration
BDT-2-N-5-6BPC	1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD	0.37 pg/g 0.54 pg/g	0.37U pg/g 0.54U pg/g
BDT-2-N-5-14BPC**	OCDD	5.1 pg/g	5.1U pg/g

No field blanks were identified in this SDG.

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 percent recovery (%R) was not within QC limits for one compound, the LCS percent recovery (%R) was within QC limits and no data were qualified.

VII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. The percent recoveries (%R) were within the 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
BDT-2-N-10-10BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	26 (40-135) 17 (40-135) 36 (40-135) 24 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 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	J (all detects) UJ (all non-detects)	P
BDT-2-N-10-12BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	34 (40-135) 20 (40-135) 28 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P

Sample	Internal Standards	%R (Limits)	Compound	Flag	A or P
BDT-2-N-10-14BPC	¹³ C-OCDD	32 (40-135)	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
BDT-2-N-10-2BPC	¹³ C-OCDD	33 (40-135)	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
BDT-2-N-10-4BPC	¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	34 (40-135) 35 (40-135)	OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-2-N-10-6BPC	¹³ C-OCDD	30 (40-135)	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
BDT-2-N-10-8BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	33 (40-135) 19 (40-135) 28 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-2-N-10-6BPC_FD	¹³ C-1,2,3,7,8-PeCDD ¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	38 (40-135) 25 (40-135) 39 (40-135)	1,2,3,7,8-PeCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-2-N-5-10BPC	¹³ C-OCDD ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	27 (40-135) 30 (40-135) 29 (40-135)	OCDD OCDF 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	J (all detects) UJ (all non-detects)	P
BDT-2-N-5-12BPC	¹³ C-OCDD ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	23 (40-135) 32 (40-135) 32 (40-135)	OCDD OCDF 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	J (all detects) UJ (all non-detects)	P

Sample	Internal Standards	%R (Limits)	Compound	Flag	A or P
BDT-2-N-5-14BPC**	¹³ C-OCDD ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	27 (40-135) 35 (40-135) 39 (40-135)	OCDD OCDF 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	J (all detects) UJ (all non-detects)	P
BDT-2-N-5-12BPC_FD	¹³ C-OCDD ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	26 (40-135) 36 (40-135) 37 (40-135)	OCDD OCDF 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	J (all detects) UJ (all non-detects)	P
BDT-2-N-5-8BPC	¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	34 (40-135) 28 (40-135) 14 (40-135) 25 (40-135) 21 (40-135)	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 OCDF 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	J (all detects) UJ (all non-detects)	P
BDT-2-N-5-2BPC	¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	37 (40-135) 34 (40-135) 14 (40-135) 28 (40-135) 28 (40-135)	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 OCDF 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	J (all detects) UJ (all non-detects)	P
BDT-2-N-5-4BPC	¹³ C-OCDD ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	22 (40-135) 33 (40-135) 32 (40-135)	OCDD OCDF 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	J (all detects) UJ (all non-detects)	P

Sample	Internal Standards	%R (Limits)	Compound	Flag	A or P
BDT-2-N-5-6BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	36 (40-135) 19 (40-135) 34 (40-135) 29 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 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	J (all detects) UJ (all non-detects)	P

X. Target Compound Identifications

All target compound identifications were within validation criteria for samples on which 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 PQLs were within validation criteria.

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG G0H270532	All compounds reported below the PQL.	J (all detects)	A

All compounds reported as EMPC were qualified as follows:

Sample	Compound	Flag	A or P
All samples in SDG G0H270532	All compounds reported by the lab 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 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 BDT-2-N-10-6BPC and BDT-2-N-10-6BPC_FD and samples BDT-2-N-5-12BPC and BDT-2-N-5-12BPC_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
	BDT-2-N-10-6BPC	BDT-2-N-10-6BPC_FD				
2,3,7,8-TCDD	0.64	0.78	-	0.14 (≤ 2.7)	-	-
1,2,3,7,8-PeCDD	1.9	2.6	-	0.7 (≤ 2.7)	-	-
1,2,3,4,7,8-HxCDD	1.2	1.6	-	0.4 (≤ 2.7)	-	-
1,2,3,6,7,8-HxCDD	2.4	3.7	-	1.3 (≤ 2.7)	-	-
1,2,3,7,8,9-HxCDD	1.3	1.8	-	0.5 (≤ 2.7)	-	-
1,2,3,4,6,7,8-HpCDD	8.0	11	-	3 (≤ 2.7)	J (all detects)	A
OCDD	24	30	-	6 (≤ 2.7)	J (all detects)	A
2,3,7,8-TCDF	12	16	29 (≤ 50)	-	-	-
1,2,3,7,8-PeCDF	22	29	27 (≤ 50)	-	-	-
2,3,4,7,8-PeCDF	12	15	-	3 (≤ 2.7)	J (all detects)	A
1,2,3,4,7,8-HxCDF	28	44	44 (≤ 50)	-	-	-
1,2,3,6,7,8-HxCDF	25	39	44 (≤ 50)	-	-	-
2,3,4,6,7,8-HxCDF	6.5	11	-	4.5 (≤ 2.7)	J (all detects)	A
1,2,3,7,8,9-HxCDF	4.8	5.6	-	0.8 (≤ 2.7)	-	-
1,2,3,4,6,7,8-HpCDF	87	120	32 (≤ 50)	-	-	-
1,2,3,4,7,8,9-HpCDF	46	61	28 (≤ 50)	-	-	-
OCDF	250	340	31 (≤ 50)	-	-	-

Compound	Concentration (pg/g)		RPD (Limits)	Difference (Limits)	Flags	A or P
	BDT-2-N-5-12BPC	BDT-2-N-5-12BPC_FD				
2,3,7,8-TCDD	0.13	0.54U	-	0.41 (≤ 0.54)	-	-
1,2,3,7,8-PeCDD	0.28	2.7U	-	2.42 (≤ 2.7)	-	-
1,2,3,4,7,8-HxCDD	0.25	2.7U	-	2.45 (≤ 2.7)	-	-
1,2,3,6,7,8-HxCDD	0.61	0.54	-	0.07 (≤ 2.7)	-	-
1,2,3,7,8,9-HxCDD	0.74	0.47	-	0.27 (≤ 2.7)	-	-
1,2,3,4,6,7,8-HpCDD	1.7	1.2	-	0.5 (≤ 2.7)	-	-
OCDD	3.8	3.3	-	0.5 (≤ 5.4)	-	-
2,3,7,8-TCDF	2.3	1.6U	-	0.7 (≤ 1.8)	-	-
1,2,3,7,8-PeCDF	3.5	1.4	-	2.1 (≤ 2.7)	-	-
2,3,4,7,8-PeCDF	1.9	0.65	-	1.25 (≤ 2.7)	-	-
1,2,3,4,7,8-HxCDF	5.8	2.4	-	3.4 (≤ 2.7)	J (all detects)	A
1,2,3,6,7,8-HxCDF	5.2	2.1	-	3.1 (≤ 2.7)	J (all detects)	A
2,3,4,6,7,8-HxCDF	1.5	0.36	-	1.14 (≤ 2.7)	-	-
1,2,3,7,8,9-HxCDF	1.1	0.69	-	0.41 (≤ 2.7)	-	-
1,2,3,4,6,7,8-HpCDF	17	6.2	-	10.8 (≤ 2.7)	J (all detects)	A
1,2,3,4,7,8,9-HpCDF	9.6	3.5	-	6.1 (≤ 2.7)	J (all detects)	A
OCDF	41	16	-	25 (≤ 5.4)	J (all detects)	A

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0H270532**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
G0H270532	BDT-2-N-10-10BPC BDT-2-N-5-6BPC	1,2,3,4,6,7,8-HpCDD OCDD OCDF 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	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270532	BDT-2-N-10-12BPC BDT-2-N-10-8BPC	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270532	BDT-2-N-10-6BPC_FD	1,2,3,7,8-PeCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270532	BDT-2-N-10-14BPC BDT-2-N-10-2BPC BDT-2-N-10-6BPC	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270532	BDT-2-N-10-4BPC	OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270532	BDT-2-N-5-10BPC BDT-2-N-5-12BPC BDT-2-N-5-14BPC** BDT-2-N-5-12BPC_FD BDT-2-N-5-4BPC	OCDD OCDF 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	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)

SDG	Sample	Compound	Flag	A or P	Reason (Code)
G0H270532	BDT-2-N-5-8BPC BDT-2-N-5-2BPC	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 OCDF 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	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270532	BDT-2-N-10-10BPC BDT-2-N-10-12BPC BDT-2-N-10-14BPC BDT-2-N-10-2BPC BDT-2-N-10-4BPC BDT-2-N-10-6BPC BDT-2-N-10-8BPC BDT-2-N-10-6BPC_FD BDT-2-N-5-10BPC BDT-2-N-5-12BPC BDT-2-N-5-14BPC** BDT-2-N-5-12BPC_FD BDT-2-N-5-8BPC BDT-2-N-5-2BPC BDT-2-N-5-4BPC BDT-2-N-5-6BPC	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
G0H270532	BDT-2-N-10-10BPC BDT-2-N-10-12BPC BDT-2-N-10-14BPC BDT-2-N-10-2BPC BDT-2-N-10-4BPC BDT-2-N-10-6BPC BDT-2-N-10-8BPC BDT-2-N-10-6BPC_FD BDT-2-N-5-10BPC BDT-2-N-5-12BPC BDT-2-N-5-14BPC** BDT-2-N-5-12BPC_FD BDT-2-N-5-8BPC BDT-2-N-5-2BPC BDT-2-N-5-4BPC BDT-2-N-5-6BPC	All compounds reported by the lab as estimated maximum possible concentration (EMPC)	JK (all detects)	A	Project Quantitation Limit (k)
G0H270532	BDT-2-N-10-6BPC BDT-2-N-10-6BPC_FD	OCDD 2,3,4,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDD 2,3,4,7,8-PeCDF	J (all detects) J (all detects) J (all detects) J (all detects)	A	Field duplicates (Difference) (fd)
G0H270532	BDT-2-N-5-12BPC BDT-2-N-5-12BPC_FD	1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,7,8,9-HpCDF OCDF 1,2,3,4,6,7,8-HpCDF	J (all detects) J (all detects) J (all detects) J (all detects) J (all detects)	A	Field duplicates (Difference) (fd)

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0H270532**

SDG	Sample	Compound	Modified Final Concentration	A or P	Code
G0H270532	BDT-2-N-10-10BPC	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 2,3,4,6,7,8-HxCDF	0.17U pg/g 0.15U pg/g 0.18U pg/g 0.86U pg/g 5.8U pg/g 0.67U pg/g 1.0U pg/g 0.33U pg/g	A	bl
G0H270532	BDT-2-N-5-10BPC	1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8,9-HxCDF	0.40U pg/g 0.47U pg/g 1.2U pg/g 2.7U pg/g 0.71U pg/g	A	bl
G0H270532	BDT-2-N-5-12BPC	1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD OCDD	0.25U pg/g 0.61U pg/g 3.8U pg/g	A	bl
G0H270532	BDT-2-N-5-12BPC_FD	1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF	0.54U pg/g 0.47U pg/g 1.22U pg/g 3.3U pg/g 0.36U pg/g 0.69U pg/g	A	bl
G0H270532	BDT-2-N-5-6BPC	1,2,3,4,7,8-HxCDD 1,2,3,7,8,9-HxCDD	0.37U pg/g 0.54U pg/g	A	bl
G0H270532	BDT-2-N-5-14BPC**	OCDD	5.1U pg/g	A	bl

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0H270532**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
 Stage 2B/4

LDC #: 24132C21
 SDG #: G0H270532
 Laboratory: Test America

Date: 10/20/10
 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: 8/25/10
II.	HRGC/HRMS Instrument performance check	A	
III.	Initial calibration	A	
IV.	Routine calibration AEV	A	
V.	Blanks	SW	
VI.	Matrix spike/Matrix spike duplicates	SW	
VII.	Laboratory control samples	A	105
VIII.	Regional quality assurance and quality control	N	
IX.	Internal standards	SW	
X.	Target compound identifications	A	Not reviewed for Stage 2B validation.
XI.	Compound quantitation and CRQLs	SW	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	SW	D = 8 10 12
XV.	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

SOIL

1	BDT-2-N-10-10BPC	11	BDT-2-N-5-14BPC**	21	025 2 329	31
2	BDT-2-N-10-12BPC	12	BDT-2-N-5-12BPC FD D ₁	22		32
3	BDT-2-N-10-14BPC	13	BDT-2-N-5-8BPC	23		33
4	BDT-2-N-10-2BPC	14	BDT-2-N-5-2BPC	24		34
5	BDT-2-N-10-4BPC	15	BDT-2-N-5-4BPC	25		35
6	BDT-2-N-10-6BPC D	16	BDT-2-N-5-6BPC	26		36
7	BDT-2-N-10-8BPC	17	BDT-2-N-10-10BPCMS	27		37
8	BDT-2-N-10-6BPC FD D	18	BDT-2-N-10-10BPCMSD	28		38
9	BDT-2-N-5-10BPC	19		29		39
10	BDT-2-N-5-12BPC D	20		30		40

Notes: _____

LDC #: 24132021
 SDG #: pu 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.	/			
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 $\leq 30\%$ 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?	/			

LDC #: 24132021
 SDG #: pu cones

VALIDATION FINDINGS CHECKLIST

Page: 2 of 2
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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 ≥ 2.5, at ± seconds RT) detected in the corresponding PCDF 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.	/	AA	
Target compounds were detected in the field duplicates.	/		AA
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:

LDC #: 24132021

VALIDATION FINDINGS WORKSHEET

Blanks

Page: 1 of 1
Reviewer: FT
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 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?

Blank extraction date: 9/9/10 Blank analysis date: 9/19/10

* EMPC

Associated samples: All soils (bl)

Compound	Blank ID	Sample Identification																		
		5X	1	9	10	12	16	11												
	0252329	MP																		
C	0.11	0.55	0.17/U		0.25/U		0.37/U													
D	0.15	0.75	0.15*/U	0.40/U	0.61/U		-													
E	0.14	0.70	0.18*/U	0.47/U	-		0.54*/U													
F	0.29*	1.45	0.86*/U	1.2*/U	-		0.54*/U													
G	1.6	8	5.8/U	2.7/U	3.8/U		1.2/U													
H	0.21*	1.05	0.67*/U		-		3.3*/U													
I	0.23	1.15	1.0*/U		-															
K	0.35	1.75	-																	
L	0.24*	1.7																		
M	0.13*	0.65	0.33*/U				0.36*/U													
N	0.16*	0.80	-	0.71*/U			0.69/U													
O	0.48*	2.4	-																	
P	0.27*	1.35	-																	
Q	1.0*	5.0	-																	

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".

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".

X (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 ?

(i)

#	Date	Lab ID/Reference	Internal Standard	% Recovery (Limit: 40-135%)	Qualifications
		17	H	22 (40-135)	no signal MS
			I	14 ()	
			E	35 ()	
			G	19 ()	
		18	F	37 ()	no signal MSD
			H	20 ()	
			I	13 ()	
			E	29 ()	
			G	17 ()	
		1	H	26 ()	J/W/P OVAL F
			I	17 ()	G, Q
			E	36 ()	K, L, M, N
			G	24 ()	O, P
		2	H	34 ()	F
			I	20 ()	G, Q
			G	28 ()	O, P
Internal Standards			Check Standard Used	Recovery Standards	Check Standard Used
A	¹³ C-2,3,7,8-TCDF			K	¹³ C-1,2,3,4-TCDD
B	¹³ C-2,3,7,8-TCDD			L	¹³ C-1,2,3,7,8,9-HxCDD
C	¹³ C-1,2,3,7,8-PeCDE			M	
D	¹³ C-1,2,3,7,8-PeCDD			N	
F	¹³ C-1,2,3,6,7,8-HxCDE			O	
F	¹³ C-1,2,3,6,7,8-HxCDD			P	
G	¹³ C-1,2,3,4,6,7,8-HpCDE			Q	
H	¹³ C-1,2,3,4,6,7,8-HpCDD			R	
I	¹³ C-OCDD			T	

LDC#:24132C1 **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 Were field duplicate pairs identified in this SDG?
Y N NA Were target analytes detected in the field duplicate pairs? (fd)

Compound	Concentration(pg/g)		%RSD ≤50	(pg/g) Difference	(pg/g) Limits	Qualifications (Parent Only)
	6	8				
A	0.64	0.78		0.14	≤0.54	
B	1.9	2.6		0.7	≤2.7	
C	1.2	1.6		0.4	≤2.7	
D	2.4 *	3.7		1.3	≤2.7	
E	1.3	1.8 *		0.5	≤2.7	
F	8.0	11		3	≤2.7	J/A wt
G	24	30		6	≤5.4	J/A det
H	12	16	29	4		
I	22	29	27	7		
J	12	15		3	≤2.7	J/A wt
K	28	44	44	16		
L	25	39	44	14		
M	6.5	11		4.5	≤2.7	J/A det
N	4.8	5.6		0.8	≤2.7	
O	87	120	32	33		
P	46	61	28	15		
Q	250	340	31	90		

* EMPC

LDC#:24132C1 **VALIDATION FINDINGS WORKSHEET**
Field Duplicates

Page: 2 of 2
 Reviewer: FJ
 2nd Reviewer: L

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?

(fd)

* EMPC

Compound	Concentration (pg/g)		%RSD ≤50	(pg/g) Difference	(pg/g) Limits	Qualifications (Parent Only)
	10	12				
A	0.13 *	0.54U		0.41	≤0.54	
B	0.28 *	2.7U		2.42	≤2.7	
C	0.25	2.7U		2.45	≤2.7	
D	0.61	0.54		0.07	≤2.7	
E	0.74 *	0.47 *		0.27	≤2.7	
F	1.7	1.2		0.5	≤2.7	
G	3.8	3.3 *		0.5	≤5.4	
H	2.3	1.6U		0.7	≤1.6	
I	3.5	1.4		2.1	≤2.7	
J	1.9	0.65 *		1.25	≤2.7	
K	5.8	2.4		3.4	≤2.7	J/A det
L	5.2	2.1 *		3.1	≤2.7	J/A det
M	1.5	0.36 *		1.14	≤2.7	
N	1.1	0.69		0.41	≤2.7	
O	17	6.2		10.8	≤2.7	J/A det
P	9.6	3.5		6.1	≤2.7	J/A det
Q	41	16		25	≤5.4	J/A det

LDC #: 2413222
 SDG #: see cany

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

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 Reviewer: F7
 2nd Reviewer: [Signature]

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA 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)	Reported		Recalculated		Reported		Recalculated	
				Average RRF (initial)	%RSD	Average RRF (initial)	%RSD	RRF (CS3 std)	%RSD	RRF (CS3 std)	%RSD
1	ICAL DBMS	7/26/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.056		1.056		1.020	3.32	1.020	3.32
			2,3,7,8-TCDD (¹³C-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)								
2	ICAL	7/21/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	0.995		0.995		0.9849	3.68	0.9849	3.68
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	0.983		0.983		0.9681	3.24	0.9681	3.24
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.163		1.163		1.1014	4.85	1.1014	5.17
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.072		1.072		1.0735	2.61	1.0735	2.61
			OCDF (¹³ C-OCDF)	1.370		1.370		1.3500	1.35	1.3500	1.35
3	ICAL	9/14/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	0.784		0.984		1.05	11.8	1.05	11.8
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	1.032		1.032		1.06	10.8	1.06	10.8
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.141		1.141		1.25	12.7	1.25	12.7
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.134		1.134		1.26	12.3	1.26	12.3
			OCDF (¹³ C-OCDF)	2.118		2.118		1.36	15.3	1.36	15.3

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

LDC #: 24132021
 SDG #: see conts

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA Method TO-9A)

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 = $100 \times (\text{ave. RRF} - \text{RRF}) / \text{ave. RRF}$
 RRF = $(A_x)(C_{is}) / (A_{is})(C_x)$
 Where: ave. RRF = initial calibration average RRF
 RRF = continuing calibration RRF
 A_x = Area of compound,
 C_x = Concentration of compound,
 A_{is} = Area of associated internal standard
 C_{is} = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Average RRF (initial)	Reported		Recalculated	
					RRF (CC)	%D	RRF (CC)	%D
1	CON 10:41	9/19/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	0.995	0.93	6.1	0.93	6.1
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	0.983	0.98	0.3	0.98	0.3
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.163	1.15	1.5	1.15	1.5
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.072	1.12	4.9	1.12	4.9
			OCDF (¹³ C-OCDF)	1.370	1.38	0.6	1.38	0.6
2	CON 8:07	9/28/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	0.92	0.92	7.9	0.92	7.9
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	0.95	0.95	3.5	0.95	3.5
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.11	1.11	4.5	1.11	4.5
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.05	1.05	2.1	1.05	2.1
			OCDF (¹³ C-OCDF)	1.29	1.29	5.8	1.29	5.8
3	CON DBNs	9/28/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.056	1.06	0.2	1.06	0.2
			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 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 #: 24132c2/

SDG #: per con

VALIDATION FINDINGS WORKSHEET

Matrix Spike/Matrix Spike Duplicates Results Verification

Page: 1 of 1

Reviewer: F7

2nd Reviewer: [Signature]

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 = 100 * MSR - MSDR / (MSR + MSDR) MSR = Matrix spike percent recovery MSDR = Matrix spike duplicate percent recovery

MS/MSD samples: 17 + 18

Compound	Spike Added (MS, MSD)		Sample Concentration (MS, MSD)	Spiked Sample Concentration (MS, MSD)		Matrix Spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		Reported	Recalculated
	MS	MSD		MS	MSD	Reported	Recalc	Reported	Recalc	RPD	RPD
2,3,7,8-TCDD	109	210	ND	19.9	19.8	92	92	91	91	0.72	0.72
1,2,3,7,8-PeCDD	109	19.8	ND	21.7	21.6	96	96	97	97	0.68	0.68
1,2,3,4,7,8-HxCDD	109	108	0.17	104	105	88	88	94	94	6.2	6.2
1,2,3,4,7,8,9-HpCDF	109	108	1.9	95.4	102	132	132	127	127	4.7	4.7
OCDF	217	216	9.1	132	139	99	99	95	95	4.6	4.6
				224	214						

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 = $100 * \frac{SSC}{SA}$ Where: SSC = Spiked sample concentration
 SA = Spike added

RPD = $100 * \frac{|LCS - LCSD|}{LCS + LCSD}$ LCS = Laboratory control sample percent recovery LCSD = Laboratory control sample duplicate percent recovery

LCS ID: 0252329 LCS

Compound	Spike Added (ppb)		Spiked Sample Concentration		LCS		LCSD		Percent Recovery		Percent Recovery		RPD	
	LCS	LCSD	LCS	LCSD	Reported	Recalc	Reported	Recalc	Reported	Recalc	Reported	Recalc	Reported	Recalculated
2,3,7,8-TCDD	20.0	NA	17.5	NA	88	88	92	92						
1,2,3,7,8-PeCDD	100		91.9		92	92	72	72						
1,2,3,4,7,8-HxCDD	100		72.4		72	72	96	96						
1,2,3,4,7,8,9-HpCDF	100		95.9		96	96	83	83						
OCDF	200		165		83	83	NA	NA						

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.

Ions Monitored for HRGC/HRMS Analysis of PCDDs/PCDFs

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	407.7818	M+2	C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO	HpCDF		
	305.8987	M+2	C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ C ₁₀	TCDF		409.7788	M+4	C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ C ₁₀ O	HpCDF		
	315.9419	M	¹³ C ₁₂ H ₉ ³⁵ Cl ₃ O	TCDF (S)		417.8250	M	¹³ C ₁₂ H ₉ ³⁵ Cl ₃ O	HpCDF (S)		
	317.9389	M+2	¹³ C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO	TCDF (S)		419.8220	M+2	¹³ C ₁₂ H ₉ 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 ₄ ³⁷ ClO	HpCDD		
	321.8936	M+2	C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ C ₁₀ ₂	TCDD		425.7737	M+2	C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ C ₁₀ ₂	HpCDD		
	331.9368	M	¹³ C ₁₂ H ₄ ³⁵ Cl ₃ O ₂	TCDD (S)		435.8169	M+4	¹³ C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ C ₁₀ ₂	HpCDD (S)		
	333.9338	M+2	¹³ C ₁₂ H ₄ ³⁵ Cl ₃ ³⁷ ClO ₂	TCDD (S)		437.8140	M+2	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	HxCDFPE		479.7165	M+4	¹³ C ₁₂ H ₄ ³⁵ Cl ₅ ³⁷ ClO ₂	HpCDD (S)		
	[354.9792]	LOCK	C ₉ F ₁₃	PFK		[430.9728]	LOCK	C ₉ F ₁₇	PCDFPE		
	2	339.8597	M+2	C ₁₂ H ₉ 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 ₉ ³⁵ Cl ₃ ³⁷ C ₁₀ O		PeCDF		443.7399	M+4	C ₁₂ ³⁵ Cl ₃ ³⁷ C ₁₀ O	OCDF
		351.9000	M+2	¹³ C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ C ₁₀		PeCDF (S)		457.7377	M+2	¹³ C ₁₂ ³⁵ Cl ₃ ³⁷ C ₁₀ O	OCDD
		353.8970	M+4	¹³ C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ C ₁₀ O		PeCDF (S)		459.7348	M+4	¹³ C ₁₂ ³⁵ Cl ₃ ³⁷ C ₁₀ O ₂	OCDD
355.8546		M+2	C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ ClO ₂	PeCDD	469.7780	M+2		¹³ C ₁₂ ³⁵ Cl ₃ ³⁷ ClO ₂	OCDD (S)		
357.8516		M+4	¹³ C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO ₂	PeCDD	471.7750	M+4		¹³ C ₁₂ ³⁵ Cl ₃ ³⁷ ClO ₂	OCDD (S)		
367.8949		M+2	¹³ C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO ₂	PeCDD (S)	513.6775	M+4		C ₁₂ ³⁵ Cl ₃ ³⁷ C ₁₀ O	DCDFPE		
369.8919		M+4	¹³ C ₁₂ H ₉ ³⁵ Cl ₃ ³⁷ ClO ₂	PeCDD (S)	[422.9278]	LOCK		C ₁₀ F ₁₇	PFK		
409.7974		M+2	C ₁₂ H ₉ ³⁵ Cl ₆ ³⁷ ClO	HxCDFPE							
[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 ₄ ³⁷ C ₁₀ O	HxCDF						
		383.8639	M	¹³ C ₁₂ H ₉ ³⁵ Cl ₅ O	HxCDF (S)						
		385.8610	M+2	¹³ C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ ClO	HxCDF (S)						
	389.8156	M+2	C ₁₂ H ₉ ³⁵ Cl ₅ ³⁷ ClO ₂	HxCDD							
	391.8127	M+4	¹³ C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ ClO ₂	HxCDD							
	401.8559	M+2	¹³ C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ ClO ₂	HxCDD (S)							
	403.8529	M+4	¹³ C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ ClO ₂	HxCDD (S)							
	445.7555	M+4	C ₁₀ H ₂ ³⁵ Cl ₆ ³⁷ ClO	HxCDFPE							
	[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

LDC #: 24132C/
 SDG #: pe cover

VALIDATION FINDINGS WORKSHEET
Sample Calculation Verification

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

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

Y N N/A
Y N N/A

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

$$\text{Concentration} = \frac{(A_x)(I_s)(Df)}{(A_s)(RRF)(V_o)(\%S)}$$

- A_x = Area of the characteristic ion (EICP) for the compound to be measured
- A_s = Area of the characteristic ion (EICP) for the specific internal standard
- I_s = Amount of internal standard added in nanograms (ng)
- V_o = Volume or weight of sample extract in milliliters (ml) or grams (g).
- RRF = Relative Response Factor (average) from the initial calibration
- Df = Dilution Factor.
- %S = Percent solids, applicable to soil and solid matrices only.

Example:

Sample I.D. #11 2,3,7,8-TCDF

$$\text{Conc.} = \frac{(2978)(2000)}{(18963610)(0.98)(0.03)(0.947)}$$

#	Sample ID	Compound	Reported Concentration ()	Calculated Concentration ()	Qualification
		#11 2,3,7,8-TCDF			
		= $\frac{101364(2000)}{(27812700)(0.98)(0.94)(0.947)}$		= 0.75 pg/g	
		#11 2,3,7,8-TCDF (DB225)			
		= $\frac{573804(2000)}{455984(1.06)(0.94)(0.947)}$		= 4.3 pg/g	
		$\frac{26601300}{26601300}$			

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

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

Collection Date: August 25, 2010

LDC Report Date: October 26, 2010

Matrix: Soil/Water

Parameters: Dioxins/Dibenzofurans

Validation Level: Stage 2B & 4

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0H270593

Sample Identification

BDT-2-N-20-10.0BPC
BDT-2-N-20-12.0BPC
BDT-2-N-20-14.0BPC**
BDT-2-N-20-2.0BPC
BDT-2-N-20-4.0BPC
BDT-2-N-20-6.0BPC
BDT-2-N-20-8.0BPC
BDT-2-N-20-12.0BPC_FD
BDT-2-N-15-10.0BPC
BDT-2-N-15-12.0BPC
BDT-2-N-15-14.0BPC**
BDT-2-N-15-2.0BPC
BDT-2-N-15-4.0BPC
BDT-2-N-15-6.0BPC
BDT-2-N-15-8.0BPC
BDT-2-N-15-6.0BPCMS
BDT-2-N-15-6.0BPCMSD

**Indicates sample underwent Stage 4 review

Introduction

This data review covers 17 soil samples and one water sample listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 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.

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
0255024-MB	9/12/10	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF	0.18 pg/g 0.84 pg/g 0.067 pg/g 0.056 pg/g 0.13 pg/g 0.12 pg/g 0.19 pg/g	All samples in SDG G0H270593

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

No field blanks were identified in this SDG.

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) were not within QC limits for several compounds, the 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. The percent recoveries (%R) were within the 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
BDT-2-N-20-12.0BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	33 (40-135) 30 (40-135) 31 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P

Sample	Internal Standards	%R (Limits)	Compound	Flag	A or P
BDT-2-N-20-14.0BPC**	¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-2,3,7,8-TCDF ¹³ C-1,2,3,7,8-PeCDF ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	36 (40-135) 36 (40-135) 21 (40-135) 14 (40-135) 15 (40-135) 30 (40-135) 33 (40-135) 20 (40-135) 11 (40-135)	All TCL compounds	J (all detects) UJ (all non-detects)	P
BDT-2-N-20-4.0BPC	¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	30 (40-135) 39 (40-135)	OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-2-N-20-8.0BPC	¹³ C-OCDD	30 (40-135)	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
BDT-2-N-20-12.0BPC_FD	¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	39 (40-135) 24 (40-135) 19 (40-135) 39 (40-135) 23 (40-135)	1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,7,8-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD OCDF 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	J (all detects) UJ (all non-detects)	P
BDT-2-N-15-10.0BPC	¹³ C-OCDD	35 (40-135)	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P
BDT-2-N-15-12.0BPC	¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	30 (40-135) 17 (40-135) 11 (40-135) 28 (40-135) 15 (40-135)	1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,7,8-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD OCDF 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	J (all detects) UJ (all non-detects)	P
BDT-2-N-15-14.0BPC**	¹³ C-1,2,3,4,6,7,8-HpCDF ¹³ C-1,2,3,4,6,7,8-HpCDD	38 (40-135) 34 (40-135)	1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF 1,2,3,4,6,7,8-HpCDD	J (all detects) UJ (all non-detects)	P

Sample	Internal Standards	%R (Limits)	Compound	Flag	A or P
BDT-2-N-15-2.0BPC	¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-OCDD ¹³ C-2,3,7,8-TCDF ¹³ C-1,2,3,7,8-PeCDF ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	22 (40-135) 31 (40-135) 35 (40-135) 36 (40-135) 20 (40-135) 27 (40-135) 34 (40-135) 36 (40-135)	2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,7,8-HxCDD OCDD OCDF 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	J (all detects) UJ (all non-detects)	P
BDT-2-N-15-4.0BPC	¹³ C-2,3,7,8-TCDD ¹³ C-1,2,3,7,8-PeCDD ¹³ C-1,2,3,6,7,8-HxCDD ¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-2,3,7,8-TCDF ¹³ C-1,2,3,7,8-PeCDF ¹³ C-1,2,3,6,7,8-HxCDF ¹³ C-1,2,3,4,6,7,8-HpCDF	17 (40-135) 21 (40-135) 18 (40-135) 19 (40-135) 13 (40-135) 15 (40-135) 19 (40-135) 21 (40-135) 17 (40-135)	All TCL compounds	J (all detects) UJ (all non-detects)	P
BDT-2-N-15-6.0BPC	¹³ C-1,2,3,4,6,7,8-HpCDD ¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	37 (40-135) 22 (40-135) 31 (40-135)	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P
BDT-2-N-15-8.0BPC	¹³ C-OCDD ¹³ C-1,2,3,4,6,7,8-HpCDF	33 (40-135) 39 (40-135)	OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P

X. Target Compound Identifications

All target compound identifications were within validation criteria for samples on which 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 PQLs were within validation criteria with the following exceptions:

Sample	Compound	Finding	Criteria	Flag	A or P
BDT-2-N-20-2.0BPC	2,3,7,8-TCDF 1,2,3,4,7,8-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)	P

All compounds reported below the PQL were qualified as follows:

Sample	Finding	Flag	A or P
All samples in SDG G0H270593	All compounds reported below the PQL.	J (all detects)	A

All compounds reported as EMPC were qualified as follows:

Sample	Compound	Flag	A or P
All samples in SDG G0H270593	All compounds reported by the lab 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 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 BDT-2-N-20-12.0BPC and BDT-2-N-20-12.0BPC_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
	BDT-2-N-20-12.0BPC	BDT-2-N-20-12.0BPC_FD				
2,3,7,8-TCDD	2.4	1.6	-	0.8 (≤ 0.55)	-	-

Compound	Concentration (pg/g)		RPD (Limits)	Difference (Limits)	Flags	A or P
	BDT-2-N-20-12.0BPC	BDT-2-N-20-12.0BPC_FD				
1,2,3,7,8-PeCDD	8.1	5.1	-	3 (≤ 2.7)	J (all detects)	A
1,2,3,4,7,8-HxCDD	4.9	3.3	-	1.6 (≤ 2.7)	-	-
1,2,3,6,7,8-HxCDD	10	7.8	-	2.2 (≤ 2.7)	-	-
1,2,3,7,8,9-HxCDD	13	7.7	-	5.3 (≤ 2.7)	J (all detects)	A
1,2,3,4,6,7,8-HpCDD	33	24	32 (≤ 50)	-	-	-
OCDD	38	31	20 (≤ 50)	-	-	-
2,3,7,8-TCDF	53	37	36 (≤ 50)	-	-	-
1,2,3,7,8-PeCDF	88	63	33 (≤ 50)	-	-	-
2,3,4,7,8-PeCDF	33	26	24 (≤ 50)	-	-	-
1,2,3,4,7,8-HxCDF	190	130	38 (≤ 50)	-	-	-
1,2,3,6,7,8-HxCDF	120	86	33 (≤ 50)	-	-	-
2,3,4,6,7,8-HxCDF	32	20	46 (≤ 50)	-	-	-
1,2,3,7,8,9-HxCDF	32	22	37 (≤ 50)	-	-	-
1,2,3,4,6,7,8-HpCDF	390	280	33 (≤ 50)	-	-	-
1,2,3,4,7,8,9-HpCDF	220	140	44 (≤ 50)	-	-	-
OCDF	960	690	33 (≤ 50)	-	-	-

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0H270593**

SDG	Sample	Compound	Flag	A or P	Reason
G0H270593	BDT-2-N-20-12.0BPC BDT-2-N-15-6.0BPC	1,2,3,4,6,7,8-HpCDD OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270593	BDT-2-N-20-14.0BPC** BDT-2-N-15-4.0BPC	All TCL compounds	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270593	BDT-2-N-20-4.0BPC BDT-2-N-15-8.0BPC	OCDD OCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270593	BDT-2-N-20-8.0BPC BDT-2-N-15-10.0BPC	OCDD OCDF	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270593	BDT-2-N-20-12.0BPC_FD BDT-2-N-15-12.0BPC	1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,7,8-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD OCDF 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	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270593	BDT-2-N-15-14.0BPC**	1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF 1,2,3,4,6,7,8-HpCDD	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)
G0H270593	BDT-2-N-15-2.0BPC	2,3,7,8-TCDD 1,2,3,7,8-PeCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,7,8-HxCDD OCDD OCDF 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	J (all detects) UJ (all non-detects)	P	Internal standards (%R) (i)

SDG	Sample	Compound	Flag	A or P	Reason
G0H270593	BDT-2-N-20-2.0BPC	2,3,7,8-TCDF 1,2,3,4,7,8-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF	J (all detects)	P	Project Quantitation Limit (exceeded range) (e)
G0H270593	BDT-2-N-20-10.0BPC BDT-2-N-20-12.0BPC BDT-2-N-20-14.0BPC** BDT-2-N-20-2.0BPC BDT-2-N-20-4.0BPC BDT-2-N-20-6.0BPC BDT-2-N-20-8.0BPC BDT-2-N-20-12.0BPC_FD BDT-2-N-15-10.0BPC BDT-2-N-15-12.0BPC BDT-2-N-15-14.0BPC** BDT-2-N-15-2.0BPC BDT-2-N-15-4.0BPC BDT-2-N-15-6.0BPC BDT-2-N-15-8.0BPC	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
G0H270593	BDT-2-N-20-10.0BPC BDT-2-N-20-12.0BPC BDT-2-N-20-14.0BPC** BDT-2-N-20-2.0BPC BDT-2-N-20-4.0BPC BDT-2-N-20-6.0BPC BDT-2-N-20-8.0BPC BDT-2-N-20-12.0BPC_FD BDT-2-N-15-10.0BPC BDT-2-N-15-12.0BPC BDT-2-N-15-14.0BPC** BDT-2-N-15-2.0BPC BDT-2-N-15-4.0BPC BDT-2-N-15-6.0BPC BDT-2-N-15-8.0BPC	All compounds reported by the lab as estimated maximum possible concentration (EMPC)	JK (all detects)	A	Project Quantitation Limit (k)
G0H270593	BDT-2-N-20-12.0BPC BDT-2-N-20-12.0BPC_FD	1,2,3,7,8,9-HxCDD 1,2,3,7,8-PeCDD	J (all detects)	A	Field duplicates (Difference) (fd)

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG
G0H270593**

No Sample Data Qualified in this SDG

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG G0H270593.**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B/4

LDC #: 24132D21
 SDG #: G0H270593
 Laboratory: Test America

Date: 10/21/10
 Page: 1 of 1
 Reviewer: FJ
 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	Δ	Sampling dates: 8/25/10
II.	HRGC/HRMS Instrument performance check	Δ	
III.	Initial calibration	Δ	
IV.	Routine calibration 4CV	Δ	
V.	Blanks	Δ SW	
VI.	Matrix spike/Matrix spike duplicates	SW	
VII.	Laboratory control samples	A	LCS
VIII.	Regional quality assurance and quality control	N	
IX.	Internal standards	SW	
X.	Target compound identifications	Δ	Not reviewed for Stage 2B validation.
XI.	Compound quantitation and CRQLs	SW	Not reviewed for Stage 2B validation.
XII.	System performance	Δ	Not reviewed for Stage 2B validation.
XIII.	Overall assessment of data	Δ	
XIV.	Field duplicates	SW	D = 2 + 8
XV.	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	BDT-2-N-20-10.0BPC	11	BDT-2-N-15-14.0BPC**	21	0255024	31	
2	BDT-2-N-20-12.0BPC	12	BDT-2-N-15-2.0BPC	22		32	
3	BDT-2-N-20-14.0BPC**	13	BDT-2-N-15-4.0BPC	23		33	
4	BDT-2-N-20-2.0BPC	14	BDT-2-N-15-6.0BPC	24		34	
5	BDT-2-N-20-4.0BPC	15	BDT-2-N-15-8.0BPC	25		35	
6	BDT-2-N-20-6.0BPC	16	BDT-2-N-15-6.0BPCMS	26		36	
7	BDT-2-N-20-8.0BPC	17	BDT-2-N-15-6.0BPCMSD	27		37	
8	BDT-2-N-20-12.0BPC * FD	18		28		38	
9	BDT-2-N-15-10.0BPC	19		29		39	
10	BDT-2-N-15-12.0BPC	20		30		40	

Notes: _____

LDC #: 2413202
 SDG #: pc cover

VALIDATION FINDINGS CHECKLIST

Page: 1 of 2
 Reviewer: FP
 2nd Reviewer: W

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 $\leq 30\%$ 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?	/			

LDC #: 24132021
 SDG #: see cover

VALIDATION FINDINGS CHECKLIST

Page: 2 of 2
 Reviewer: A
 2nd Reviewer: W

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:

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".

X 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?

(i)

#	Date	Lab ID/Reference	Internal Standard	% Recovery (Limit: 40-135%)	Qualifications
		16	I	38 (40-135)	no equal MS
		17	I	36 ()	no equal MSD
		2	H	33 (40-135)	J/W/P equal F
			I	30 ()	G, Q
			G	31 ()	O, P
		3	B	36 ()	QUAL AN TEL
			D	36 ()	
			F	21 ()	
			H	14 ()	
			I	15 ()	
			A	30 ()	
			C	33 ()	
			E	20 ()	
			G	11 ()	✓

Internal Standards	Check Standard Used	Recovery Standards	Check Standard Used
¹³ C-2,3,7,8-TCDF			
¹³ C-2,3,7,8-TCDD		¹³ C-1,2,3,4-TCDD	K
¹³ C-1,2,3,7,8-PeCDD		¹³ C-1,2,3,7,8,9-HxCDD	L
¹³ C-1,2,3,7,8-PeCDE			M
¹³ C-1,2,3,6,7,8-HxCDE			N
¹³ C-1,2,3,6,7,8-HxCDD			O
¹³ C-1,2,3,4,6,7,8-HpCDE			P
¹³ C-1,2,3,4,6,7,8-HpCDD			Q
¹³ C-OCDD			R
			T

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	compd's Sample ID	Finding	Associated Samples	Qualifications
			All compounds reported below PQL	All	J/A detects (sp)
			All compounds reported as EMPC	All	JK detects (k)
		H, K, G, P, Q	x'd cal Range	4	J/P det (c)

Comments: See sample calculation verification worksheet for recalculations

LDC#:24132D21

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Page: 1 of 1
 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?

(fd)

Compound	Concentration (pg/g)		%RSD ≤50	(pg/g) Difference	(pg/g) Limits	Qualifications (Parent Only)
	2	8				
A	2.4	1.6		0.8	≤0.55	
B	8.1	5.1		3	≤2.7	U/A dt
C	4.9	3.3		1.6	≤2.7	
D	10	7.8		2.2	≤2.7	
E	13	7.7		5.3	≤2.7	J/A dt
F	33	24	32			
G	38	31	20			
H	53	37	36			
I	88	63	33			
J	33	26	24			
K	190	130	38			
L	120	86	33			
M	32	20	46			
N	32	22	37			
O	390	280	33			
P	220	140	44			
Q	960	690	33			

LDC #: 24132021
 SDG #: see copy

VALIDATION FINDINGS WORKSHEET
Initial Calibration Calculation Verification

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA 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:

$RRF = (A_s)(C_{is}) / (A_{is})(C_s)$
 average RRF = sum of the RRFs/number of standards
 $\%RSD = 100 * (S/X)$
 A_s = Area of compound,
 C_s = 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)	Reported		Recalculated		Reported		Recalculated	
				Average RRF (initial)	%RSD	Average RRF (initial)	%RSD	RRF (CS)	%RSD	RRF (CS)	%RSD
1	1CAL DBS	9/18/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.02408	9.91493	1.02408	9.91493	1.14942	9.91493	1.14942	9.915
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	1.18998	4.16239	1.18998	4.16239	1.18451	4.16239	1.18451	4.162
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.16375	7.14786	1.16375	7.14786	1.23468	7.14786	1.23468	7.148
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.08281	6.58155	1.08281	6.58155	1.16859	6.58155	1.16859	6.582
2	1CAL DBMS	7/26/10	OCDF (¹³ C-OCDF)	1.54183	8.11137	1.54183	8.11137	1.64541	8.11137	1.64541	8.111
			2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.050	3.32	1.050	3.32	1.02	3.32	1.02	3.32
			2,3,7,8-TCDD (¹³C-2,3,7,8-TCDD)								
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)								
3			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)								
			OCDF (¹³ C-OCDF)								
			2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)								
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)								

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

LDC #: 24132021
 SDG #: see coms

VALIDATION FINDINGS WORKSHEET
Routine Calibration Results Verification

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA Method TO-9A)

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 = $100 \times (\text{ave. RRF} - \text{RRF}) / \text{ave. RRF}$ Where: ave. RRF = initial calibration average RRF
 RRF = $(A_x)(C_{is}) / (A_{is})(C_x)$ RRF = continuing calibration RRF
 A_x = Area of compound, A_{is} = Area of associated internal standard
 C_x = Concentration of compound, C_{is} = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Average RRF (Initial)	Reported		Recalculated	
					RRF (CC)	%D	RRF (CC)	%D
1	22-SE 6305	9/23/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.02108	1.07472	4.9	1.07472	4.9
	-31		2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)	1.18998	1.14248	4.0	1.14248	4.0
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)	1.16375	1.18872	2.1	1.18872	2.1
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)	1.08281	1.13257	4.6	1.13257	4.6
			OCDF (¹³ C-OCDF)	1.54183	1.64300	6.6	1.64300	6.6
2	24-SE 10305-9	9/24/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)		1.05382	2.9	1.05382	2.9
			2,3,7,8-TCDD (¹³ C-2,3,7,8-TCDD)		1.10906	6.8	1.10906	6.8
			1,2,3,6,7,8-HxCDD (¹³ C-1,2,3,6,7,8-HxCDD)		1.23635	6.2	1.23635	6.2
			1,2,3,4,6,7,8-HpCDD (¹³ C-1,2,4,6,7,8-HpCDD)		1.11504	3.0	1.11504	3.0
			OCDF (¹³ C-OCDF)		1.67440	8.6	1.67440	8.6
3	25-SE 10502	9/25/10	2,3,7,8-TCDF (¹³ C-2,3,7,8-TCDF)	1.056	1.12	5.8	1.12	5.8
	DB 225		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)	1.056	1.09	2.9	1.09	2.9
			OCDF (¹³ C-OCDF)					

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: 16 & 17

Compound	Spike Added		Sample Concentration (pg/g)	Spiked Sample Concentration		Matrix Spike Percent Recovery		Matrix Spike Duplicate Percent Recovery		Reported RPD		Recalculated RPD	
	MS	MSD		MS	MSD	Reported	Recalc.	Reported	Recalc.	RPD	RPD	RPD	RPD
	(pg/g)	(pg/g)		(pg/g)	(pg/g)								
2,3,7,8-TCDD	20.7	22.5	2.7	19.6	21.5	82	82	84	84	9.0	9.0	9.0	9.0
1,2,3,7,8-PeCDD	103	112	9.4	96.8	102	84	84	82	82	5.3	5.3	5.3	5.3
1,2,3,4,7,8-HxCDD	↓	↓	5.1	85.7	97.1	78	78	82	82	12	12	12	12
1,2,3,4,7,8,9-HpCDF	↓	↓	240	220	261	0	0	15	15	0	0	0	0
OCDF	207	225	1500	858	1080	0	0	0	0	0	0	0	0

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.

LDC #: 24132021
 SDG #: see copy

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

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 = $100 \cdot \text{LCS} - \text{LCS}_D \cdot 2 / (\text{LCS} + \text{LCS}_D)$ LCS = Laboratory control sample percent recovery LCS_D = Laboratory control sample duplicate percent recovery

LCS ID: 0255624-157

Compound	Spike Added (ppb)		Spiked Sample Concentration		LCS		LCS _D		Percent Recovery		Percent Recovery		RPD	
	LCS	LCS _D	LCS	LCS _D	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.	Reported	Recalc.
2,3,7,8-TCDD	20.0	NA	18.5	NA	92	92	92	92						
1,2,3,7,8-PeCDD	100		91.8		92	92	92	92						
1,2,3,4,7,8-HxCDD	100		85.1		85	85	85	85						
1,2,3,4,7,8,9-HpCDF	100		105		105	105	105	105						
OCDF	200		172		86	86	86	86	NA	NA				

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.

Ions Monitored for HRGC/HRMS Analysis of PCDDs/PCDFs

Descriptor	Accurate mass ^(b)	Ion ID	Elemental Composition	Analyte	Descriptor	Accurate Mass ^(b)	Ion ID	Elemental Composition	Analyte		
1	303.9016	M	C ₁₂ H ₄ ³⁵ Cl ₄ O	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 Cl ₁₀	TCDF		409.7788	M+4	C ₁₂ H ³⁵ Cl ₅ ³⁷ Cl ₂ O	HpCDF		
	315.9419	M	¹³ C ₁₂ H ₄ ³⁵ Cl ₄ O	TCDF (S)		417.8250	M	¹³ C ₁₂ H ³⁵ Cl ₄ 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 ³⁵ Cl ₅ ³⁷ ClO	HpCDF		
	319.8965	M	C ₁₂ H ₄ ³⁵ Cl ₄ O ₂	TCDD		423.7767	M+2	C ₁₂ H ³⁵ Cl ₆ ³⁷ ClO ₂	HpCDD		
	321.8936	M+2	C ₁₂ H ₃ ³⁵ Cl ₃ ³⁷ ClO ₂	TCDD		425.7737	M+2	C ₁₂ H ³⁵ Cl ₅ ³⁷ ClO ₂	HpCDD		
	331.9368	M	¹³ C ₁₂ H ₃ ³⁵ Cl ₃ O ₂	TCDD (S)		435.8169	M+4	¹³ C ₁₂ H ³⁵ Cl ₅ 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+2	¹³ C ₁₂ H ³⁵ Cl ₆ ³⁷ ClO ₂	HpCDD (S)		
	375.8364	M+2	C ₉ H ₃ ³⁵ Cl ₃ ³⁷ ClO	HxCDF		479.7165	M+4	C ₁₂ H ³⁵ Cl ₅ ³⁷ Cl ₂ O ₂	HpCDD (S)		
	[354.9792]	LOCK	C ₉ F ₁₃	PFK		[430.9728]	LOCK	C ₉ F ₁₇	NCDPE		
										PFK	
	2	339.8597	M+2	C ₁₂ H ₉ ³⁵ Cl ₄ ³⁷ ClO		PeCDF	5	441.7428	M+2	C ₁₂ ³⁵ Cl ₇ ³⁷ ClO	OCDF
		341.8567	M+4	C ₁₂ H ₉ 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 ₉ ³⁵ Cl ₄ ³⁷ ClO	PeCDF (S)	457.7377	M+2		C ₁₂ ³⁵ Cl ₅ ³⁷ ClO ₂	OCDD		
353.8970		M+4	¹³ C ₁₂ H ₉ 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 ₉ 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 ₉ 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 ₉ ³⁵ Cl ₄ ³⁷ ClO ₂	PeCDD (S)	513.6775	M+4		C ₁₂ ³⁵ Cl ₅ ³⁷ Cl ₂ O	DCDPE		
369.8919		M+4	¹³ C ₁₂ H ₉ 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 ₉ ³⁵ Cl ₃ ³⁷ ClO	HxCDF							
[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 ₃ ³⁷ Cl ₂ O	OCDF							
	[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 Additional Sampling,
Henderson, Nevada

Collection Date: August 27, 2010

LDC Report Date: October 22, 2010

Matrix: Water

Parameters: Dioxins/Dibenzofurans

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0H310577

Sample Identification

EB-08272010

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.

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
0251243-MB	9/8/10	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF	3.7 pg/L 39 pg/L 4.2 pg/L	All samples in SDG G0H310577

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-08272010	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF	3.9 pg/L 22 pg/L 3.0 pg/L	3.9U pg/L 22U pg/L 3.0U pg/L

Sample EB-08272010 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-08272010	8/27/10	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 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF	1.5 pg/L 3.9 pg/L 22 pg/L 2.7 pg/L 2.0 pg/L 1.7 pg/L 3.0 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 with the following exceptions:

LCS ID	Compound	%R (Limits)	Associated Samples	Flag	A or P
0251243-LCS	2,3,4,6,7,8-HxCDF	138 (80-137)	All samples in SDG G0H310577	J+ (all detects)	P

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 G0H310577	All compounds reported below the PQL.	J (all detects)	A

All compounds reported as EMPC were qualified as follows:

Sample	Compound	Flag	A or P
All samples in SDG G0H310577	All compounds reported by the lab 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 Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0H310577**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
G0H310577	EB-08272010	2,3,4,6,7,8-HxCDF	J+ (all detects)	P	Laboratory control samples (%R) (l)
G0H310577	EB-08272010	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
G0H310577	EB-08272010	All compounds reported by the lab as estimated maximum possible concentration (EMPC)	JK (all detects)	A	Project Quantitation Limit (k)

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0H310577**

SDG	Sample	Compound	Modified Final Concentration	A or P	Code
G0H310577	EB-08272010	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF	3.9U pg/L 22U pg/L 3.0U pg/L	A	bl

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG G0H310577**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson

VALIDATION COMPLETENESS WORKSHEET

Stage 2B

LDC #: 24132E21

SDG #: G0H310577

Laboratory: Test America

Date: 10/19/10

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	Δ	Sampling dates: 8/27/10
II.	HRGC/HRMS Instrument performance check	Δ	
III.	Initial calibration	Δ	
IV.	Routine calibration/ CV	Δ	
V.	Blanks	SW	
VI.	Matrix spike/Matrix spike duplicates	N	SC sample
VII.	Laboratory control samples	SW	US
VIII.	Regional quality assurance and quality control	N	
IX.	Internal standards	Δ	
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	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:

WAW

1	EB-08272010	11	0251243 - 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 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 Additional Sampling,
Henderson, Nevada

Collection Date: August 30, 2010

LDC Report Date: October 22, 2010

Matrix: Water

Parameters: Dioxins/Dibenzofurans

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G01010538

Sample Identification
EB-08302010

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.

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
0251243-MB	9/8/10	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF	3.7 pg/L 39 pg/L 4.2 pg/L	All samples in SDG G01010538

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-08302010	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF	2.3 pg/L 27 pg/L 5.2 pg/L	2.3U pg/L 27U pg/L 5.2U pg/L

Sample EB-08302010 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-08302010	8/30/10	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	2.3 pg/L 27 pg/L 2.1 pg/L 1.7 pg/L 1.2 pg/L 5.2 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 with the following exceptions:

LCS ID	Compound	%R (Limits)	Associated Samples	Flag	A or P
0251243-LCS	2,3,4,6,7,8-HxCDF	138 (80-137)	All samples in SDG G0I010538	J+ (all detects)	P

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 G0I010538	All compounds reported below the PQL.	J (all detects)	A

All compounds reported as EMPC were qualified as follows:

Sample	Compound	Flag	A or P
All samples in SDG G0I010538	All compounds reported by the lab 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 Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0I010538**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
G0I010538	EB-08302010	2,3,4,6,7,8-HxCDF	J+ (all detects)	P	Laboratory control samples (%R) (l)
G0I010538	EB-08302010	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
G0I010538	EB-08302010	All compounds reported by the lab as estimated maximum possible concentration (EMPC)	JK (all detects)	A	Project Quantitation Limit (k)

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0I010538**

SDG	Sample	Compound	Modified Final Concentration	A or P	Code
G0I010538	EB-08302010	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF	2.3U pg/L 27U pg/L 5.2U pg/L	A	bl

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG G0I010538**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
 Stage 2B

LDC #: 24132F21
 SDG #: G0I010538
 Laboratory: Test America

Date: 10/19/10
 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	Δ	Sampling dates: <u>8/30/10</u>
II.	HRGC/HRMS Instrument performance check	Δ	
III.	Initial calibration	Δ	
IV.	Routine calibration/ LCV	A	
V.	Blanks	SW	
VI.	Matrix spike/Matrix spike duplicates	N	<u>QC sample</u>
VII.	Laboratory control samples	SW	<u>LCs</u>
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	Δ	
XIV.	Field duplicates	N	
XV.	Field blanks	SW	<u>EB = 1</u>

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:
water

1	EB-08302010	11	<u>0251243-MB</u>	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 Additional Sampling,
Henderson, Nevada

Collection Date: September 1, 2010

LDC Report Date: October 28, 2010

Matrix: Water

Parameters: Dioxins/Dibenzofurans

Validation Level: Stage 2B

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): G0I030656

Sample Identification
EB-09012010

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.

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
0251243-MB	9/8/10	1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,4,6,7,8-HpCDF	3.7 pg/L 39 pg/L 4.2 pg/L	All samples in SDG G01030656

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-09012010	OCDD	170 pg/L	170U pg/L

Sample EB-09012010 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-09012010	9/1/10	2,3,7,8-TCDD	8.0 pg/L	No associated samples in this SDG
		1,2,3,7,8-PeCDD	30 pg/L	
		1,2,3,4,7,8-HxCDD	17 pg/L	
		1,2,3,6,7,8-HxCDD	41 pg/L	
		1,2,3,7,8,9-HxCDD	35 pg/L	
		1,2,3,4,6,7,8-HpCDD	140 pg/L	
		OCDD	170 pg/L	
		2,3,7,8-TCDF	250 pg/L	
		1,2,3,7,8-PeCDF	470 pg/L	
		2,3,4,7,8-PeCDF	240 pg/L	
		1,2,3,4,7,8-HxCDF	940 pg/L	
		1,2,3,6,7,8-HxCDF	730 pg/L	
		2,3,4,6,7,8-HxCDF	180 pg/L	
		1,2,3,7,8,9-HxCDF	140 pg/L	
		1,2,3,4,6,7,8-HpCDF	2600 pg/L	
		1,2,3,4,7,8,9-HpCDF	960 pg/L	
		OCDF	5400 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 with the following exceptions:

LCS ID	Compound	%R (Limits)	Associated Samples	Flag	A or P
0251243-LCS	2,3,4,6,7,8-HxCDF	138 (80-137)	All samples in SDG G01030656	J+ (all detects)	P

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 G01030656	All compounds reported below the PQL.	J (all detects)	A

All compounds reported as EMPC were qualified as follows:

Sample	Compound	Flag	A or P
All samples in SDG G01030656	All compounds reported by the lab 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 Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Data Qualification Summary - SDG G0I030656**

SDG	Sample	Compound	Flag	A or P	Reason (Code)
G0I030656	EB-09012010	2,3,4,6,7,8-HxCDF	J+ (all detects)	P	Laboratory control samples (%R) (l)
G0I030656	EB-09012010	All compounds reported below the PQL.	J (all detects)	A	Project Quantitation Limit (sp)
G0I030656	EB-09012010	All compounds reported by the lab as estimated maximum possible concentration (EMPC)	JK (all detects)	A	Project Quantitation Limit (k)

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG G0I030656**

SDG	Sample	Compound	Modified Final Concentration	A or P	Code
G0I030656	EB-09012010	OCDD	170U pg/L	A	bl

**Tronox LLC Facility, PCS Additional Sampling, Henderson, Nevada
Dioxins/Dibenzofurans - Equipment Blank Data Qualification Summary - SDG G0I030656**

No Sample Data Qualified in this SDG

Tronox Northgate Henderson
VALIDATION COMPLETENESS WORKSHEET
 Stage 2B

LDC #: 24132G21
 SDG #: G01020656
 Laboratory: Test America

Date: 10/19/10
 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	Δ	Sampling dates: <u>9/1/10</u>
II.	HRGC/HRMS Instrument performance check	Δ	
III.	Initial calibration	Δ	
IV.	Routine calibration/ BL	Δ	
V.	Blanks	SW	
VI.	Matrix spike/Matrix spike duplicates	N	<u>QC sample</u>
VII.	Laboratory control samples	SW	<u>LC</u>
VIII.	Regional quality assurance and quality control	N	
IX.	Internal standards	Δ	
X.	Target compound identifications	N	
XI.	Compound quantitation and CRQLs	SW	
XII.	System performance	N	
XIII.	Overall assessment of data	Δ	
XIV.	Field duplicates	N	
XV.	Field blanks	SW	

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:
water

1	EB-09012010	11	<u>6251243-MB</u>	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:

LDC #: 24132 G2/

VALIDATION FINDINGS WORKSHEET

Field Blanks

Page: 1 of 1
Reviewer: EB
2nd Reviewer: LD

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

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

Blank units: 24132 Associated sample units: NA

Sampling date: 9/11/10

Field blank type: (circle one) Field Blank / Rinsate / Other: EB Associated Samples: A11

Compound	Blank ID	Sample Identification
A	40*	
B	30	
C	17	
D	41	
E	35	
F	140	
G	170	
H	250	
I	470	
J	240	
K	940	
L	730	
M	180	
N	140	
O	2600	
P	960	
Q	5400	
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".

