LABORATORY DATA CONSULTANTS, INC.
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ERM
2525 Natomas Park Drive, Suite 350
Sacramento, CA 95833
ATTN: Ms. Maria Barajas-Albalawi

August 6, 2008

SUBJECT: BRC Tronox Parcel G, Data Validation

Dear Ms. Barajas-Albalawi

Enclosed are the final validation reports for the fractions listed below. This SDG was received on July 14, 2008. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 19098:

SDG #	Fraction
F8F050256	Volatiles, Semivolatiles, Chlorinated Pesticides, Polychlorinated Biphenyls, Metals, Wet Chemistry, Gasoline Range Organics, Diesel Range Organics, Polynuclear Aromatic Hydrocarbons, Dioxins/Dibenzofurans

The data validation was performed under EPA Level III guidelines. The analyses were validated using the following documents, as applicable to each method:

- USEPA, Contract Laboratory Program National Functional Guidelines for Organic Data Review, October 1999
- USEPA, Contract Laboratory Program National Functional Guidelines for Inorganic Data Review, October 2004
- EPA SW 846, Third Edition, Test Methods for Evaluating Solid Waste, update 1, July 1992; update IIA, August 1993; update II, September 1994; update IIB, January 1995; update III, December 1996; update IIIA, April 1998; IIIB, November 2004; Update IV, February 2007

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

Sincerely,

ERauto

Erlinda T. Rauto
Operations Manager/Senior Chemist

80/20

LDC #19098 (ERM-Sacramento / BRC Tronox, Parcel G)

LDC	SDG#	DATE REC'D	(3) DATE DUE	VOA (8260B)		SVOA (8270C)		Pest. (8081A)		PCBs (8082)		Metals (SW846)		GRO (8015)		DRO (8015)		PAHs (8310)		Dioxins (8290)		Bromide Bromine Chlorate		Chloride Chlorine Fluoride		NO_3 NO_2 O-OP_4		SO_4 (300.0)		O&G (9071B)							
Matrix:	Water/Soil			W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S	W	S
A	F8F050256	07/14/08	08/04/08	1	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3						
Total	T/LR			1	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	3	0	0	0	0	0	43

Shaded cells indicate Level IV validation (all other cells are Level IIII validation). These sample counts do not include MS/MSD, and DUPs

LDC Report# 19098A1

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 4, 2008

LDC Report Date: July 23, 2008

Matrix: Soil/Water

Parameters: Volatiles

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

TSB-GJ-09-0'
TSB-GJ-09-0'-FD
TSB-GJ-08-0'
TB-4

Introduction

This data review covers 3 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 8260B for Volatiles.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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.

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.

A Indicates the finding is based upon technical validation criteria.

P Indicates the finding is related to a protocol/contractual deviation.

None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

Percent relative standard deviations (%RSD) were less than or equal to 15.0% for each individual compound and less than or equal to 30.0% for calibration check compounds (CCCs).

In the case where %RSD was greater than 15.0%, the laboratory used a calibration curve to evaluate the compound. All coefficients of determination (r^2) were greater than or equal to 0.990 .

For the purposes of technical evaluation, all compounds were evaluated against the 30.0% (%RSD) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria.

Average relative response factors (RRF) for all volatile target compounds and system performance check compounds (SPCCs) were within method and validation criteria with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
5/28/08 (MICALBRC)	Ethanol	0.00361 (≥0.05)	All water samples in SDG F8F050256	J (all detects) UJ (all non-detects)	A
5/28/08 (MICAL)	Acetonitrile 2-Butanone	0.00984 (≥0.05) 0.03111 (≥0.05)	All water samples in SDG F8F050256	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A
5/21/08 (GICALBRC)	Ethanol	0.00086 (≥0.05)	All soil samples in SDG F8F050256	J (all detects) UJ (all non-detects)	A

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

Percent differences (%D) between the initial calibration RRF and the continuing calibration RRF were within the method criteria of less than or equal to 20.0% for calibration check compounds (CCCs).

For the purposes of technical evaluation, all compounds were evaluated against the 25.0% (%D) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria with the following exceptions:

Date	Compound	%D	Associated Samples	Flag	A or P
6/9/08 (GCAL1940)	Acetonitrile	25.93241	All soil samples in SDG F8F050256	J+ (all detects)	A
6/10/08 (MCAL7269)	Dichlorodifluoromethane Bromomethane	25.94405 33.13188	All water samples in SDG F8F050256	J+ (all detects) J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 25.0% for all compounds with the following exceptions:

Date	Compound	%D	Associated Samples	Flag	A or P
5/23/08 (GICV1844)	Dichlorodifluoromethane Tetrachloroethene Nonanal	49.46918 34.40890 74.79276	All soil samples in SDG F8F050256	J+ (all detects) J+ (all detects) J+ (all detects)	A
5/28/08 (MICV7100)	Iodomethane Nonanal	28.47470 40.60652	All water samples in SDG F8F050256	J+ (all detects) J+ (all detects)	A

All of the continuing calibration RRF values were within method and validation criteria with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/9/08	Ethanol	0.00079 (≥0.05)	All soil samples in SDG F8F050256	J (all detects) UJ (all non-detects)	A
6/10/08	Acetonitrile 2-Butanone	0.00933 (≥0.05) 0.02516 (≥0.05)	All water samples in SDG F8F050256	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A

V. Blanks

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

Method Blank ID	Analysis Date	Compound TIC (RT in minutes)	Concentration	Associated Samples
F8F090000-367	6/9/08	Dichloromethane	1.1 ug/Kg	All soil samples in SDG F8F050256

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 TIC (RT in minutes)	Reported Concentration	Modified Final Concentration
TSB-GJ-08-0'	Dichloromethane	11 ug/Kg	11U ug/Kg

Sample TB-4 was identified as a trip blank. No volatile contaminants were found in this blank with the following exceptions:

Trip Blank ID	Sampling Date	Compound	Concentration	Associated Samples
TB-4	6/4/08	Dichloromethane Acetone Chloroform	0.29 ug/L 0.85 ug/L 0.11 ug/L	All soil samples in SDG F8F050256

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

VI. Surrogate Spikes

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

Sample	Surrogate	%R (Limits)	Compound	Flag	A or P
F8F160000-097	Bromofluorobenzene	124 (79-115)	All TCL compounds	J+ (all detects)	P

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

All internal standard areas and retention times were within QC limits.

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Compound Quantitation and CRQLs

Raw data were not reviewed for this SDG.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment of Data

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

XVI. Field Duplicates

Samples TSB-GJ-09-0' and TSB-GJ-09-0'-FD were identified as field duplicates. No volatiles were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flags	A or P
	TSB-GJ-09-0'	TSB-GJ-09-0'-FD				
Acetone	15	9.8	-	5.2 (≤21)	-	-
Dichloromethane	16	15	-	1.0 (≤5.2)	-	-

BRC Tronox Parcel G
Volatiles - Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Flag	A or P	Reason
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0' TB-4	Ethanol	J (all detects) UJ (all non-detects)	A	Initial calibration (RRF)
F8F050256	TB-4	Acetonitrile 2-Butanone	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A	Initial calibration (RRF)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Acetonitrile	J+ (all detects)	A	Continuing calibration (%D)
F8F050256	TB-4	Dichlorodifluoromethane Bromomethane	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Dichlorodifluoromethane Tetrachloroethene Nonanal	J+ (all detects) J+ (all detects) J+ (all detects)	A	Continuing calibration (ICV %D)
F8F050256	TB-4	Iodomethane Nonanal	J+ (all detects) J+ (all detects)	A	Continuing calibration (ICV %D)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Ethanol	J (all detects) UJ (all non-detects)	A	Continuing calibration (RRF)
F8F050256	TB-4	Acetonitrile 2-Butanone	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A	Continuing calibration (RRF)

BRC Tronox Parcel G
Volatiles - Laboratory Blank Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound TIC (RT in minutes)	Modified Final Concentration	A or P
F8F050256	TSB-GJ-08-0'	Dichloromethane	11U ug/Kg	A

BRC Tronox Parcel G
Volatiles - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: 19098A1
SDG #: F8F050256
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III

Date: 7/20/08
Page: 1 of 1
Reviewer:
2nd Reviewer:

METHOD: GC/MS Volatiles (EPA SW 846 Method 8260B)

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: 6/4/08
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	SW	% RSD, r^2 ≥ 0.990
IV.	Continuing calibration/ICV	SW	
V.	Blanks	SW	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	TSB-FJ-06-2-0'
VIII.	Laboratory control samples	SW	LCS/D
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	SW	D = 1 & 2
XVII.	Field blanks	SW	TB = 4

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

Validated Samples: soil + water

1 1	TSB-GJ-09-0'	11 1	F8F090000-367	21	8161367	31	
2 1	TSB-GJ-09-0'-FD	12 2	F8F130000-280	22	8165280	32	
3 1	TSB-GJ-08-0'	13 3	~~F8F050256-045~~	23	8168097	33	
4 2	3 = 2 ons TB-4 W	14	F8F160000-097	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	

TARGET COMPOUND WORKSHEET

METHOD: VOA (EPA SW 846 Method 8260B)

A. Chloromethane*	U. 1,1,2-Trichloroethane	OO. 2,2-Dichloropropane	III. n-Butylbenzene	CCCC.1-Chlorohexane
B. Bromomethane	V. Benzene	PP. Bromochloromethane	JJJ. 1,2-Dichlorobenzene	DDDD. Isopropyl alcohol
C. Vinyl choride**	W. trans-1,3-Dichloropropene	QQ. 1,1-Dichloropropene	KKK. 1,2,4-Trichlorobenzene	EEEE. Acetonitrile
D. Chloroethane	X. Bromoform*	RR. Dibromomethane	LLL. Hexachlorobutadiene	FFFF. Acrolein
E. Methylene chloride	Y. 4-Methyl-2-pentanone	SS. 1,3-Dichloropropane	MMM. Naphthalene	GGGG. Acrylonitrile
F. Acetone	Z. 2-Hexanone	TT. 1,2-Dibromoethane	NNN. 1,2,3-Trichlorobenzene	HHHH. 1,4-Dioxane
G. Carbon disulfide	AA. Tetrachloroethene	UU. 1,1,1,2-Tetrachloroethane	OOO. 1,3,5-Trichlorobenzene	IIII. Isobutyl alcohol
H. 1,1-Dichloroethene**	BB. 1,1,2,2-Tetrachloroethane*	VV. Isopropylbenzene	PPP. trans-1,2-Dichloroethene	JJJJ. Methacrylonitrile
I. 1,1-Dichloroethane*	CC. Toluene**	WW. Bromobenzene	QQQ. cis-1,2-Dichloroethene	KKKK. Propionitrile
J. 1,2-Dichloroethene, total	DD. Chlorobenzene*	XX. 1,2,3-Trichloropropane	RRR. m,p-Xylenes	LLLL. Ethyl ether
K. Chloroform**	EE. Ethylbenzene**	YY. n-Propylbenzene	SSS. o-Xylene	MMMM. Benzyl chloride
L. 1,2-Dichloroethane	FF. Styrene	ZZ. 2-Chlorotoluene	TTT. 1,1,2-Trichloro-1,2,2-trifluoroethane	NNNN.
M. 2-Butanone	GG. Xylenes, total	AAA. 1,3,5-Trimethylbenzene	UUU. 1,2-Dichlorotetrafluoroethane	OOOO.
N. 1,1,1-Trichloroethane	HH. Vinyl acetate	BBB. 4-Chlorotoluene	VVV. 4-Ethyltoluene	PPPP.
O. Carbon tetrachloride	II. 2-Chloroethylvinyl ether	CCC. tert-Butylbenzene	WWW. Ethanol	QQQQ.
P. Bromodichloromethane	JJ. Dichlorodifluoromethane	DDD. 1,2,4-Trimethylbenzene	XXX. Di-isopropyl ether	RRRR.
Q. 1,2-Dichloropropane**	KK. Trichlorofluoromethane	EEE. sec-Butylbenzene	YYY. tert-Butanol	SSSS.
R. cis-1,3-Dichloropropene	LL. Methyl-tert-butyl ether	FFF. 1,3-Dichlorobenzene	ZZZ. tert-Butyl alcohol	TTTT.
S. Trichloroethene	MM. 1,2-Dibromo-3-chloropropane	GGG. p-Isopropyltoluene	AAAA. Ethyl tert-butyl ether	UUUU.
T. Dibromochloromethane	NN. Methyl ethyl ketone	HHH. 1,4-Dichlorobenzene	BBBB. tert-Amyl methyl ether	VVVV.

* = System performance check compounds (SPCC) for RRF ; ** = Calibration check compounds (CCC) for %RSD.

LDC #: 19078A1
SDG #: pw cover

VALIDATION FINDINGS WORKSHEET
Initial Calibration

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

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

Y N N/A Did the laboratory perform a 5 point calibration prior to sample analysis?
Y N N/A Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's?
Y N N/A Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation?_____
Y N N/A Did the initial calibration meet the acceptance criteria?
Y N N/A Were all %RSDs and RRFs within the validation criteria of ≤30 %RSD and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %RSD (Limit: <30.0%)	Finding RRF (Limit: >0.05)	Associated Samples	Qualifications
	~~5/28/08~~	MICAL	~~Dodomethane~~				
	5/28/08	MICAL BRC	WWW		0.00361	F8F130000-280, +All water	J/UJ/A
	5/28/08	MICAL	EEEE		0.00984	F8F130000-280,	J/UJ/A
			M		0.03111	All water	↓
	5/21/08	GICAL BRC	WWW		0.00086	F8F090000-367, All soils	J/UJ/A

LDC #: 190984A1
SDG #: all covers

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

Y N N/A Was a continuing calibration standard analyzed at least once every 12 hours for each instrument?
Y N N/A Were percent differences (%D) and relative response factors (RRF) within method criteria for all CCC's and SPCC's ?
Y N N/A Were all %D and RRFs within the validation criteria of ≤25 %D and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %D (Limit: <25.0%)	Finding RRF (Limit: >0.05)	Associated Samples	Qualifications
	~~5/23/08~~	~~GICV~~					✓
+	5/23/08	GICV1844	JJ	49.46918		F8F090000-367,	J+/A det
+			AA	34.40890		+ All Soils	↓
+			Nonanal	74.79276		↓	↓
+	5/28/08	MICV7100	Iodomethane	28.47470		F8F130000-280,	J+/A det
+			Nonanal	40.60652		+ All water	↓
+	6/9/08	GCAL1940	EEEE	25.93241		F8F090000-367,	J+/A det
						+ All Soils	
	6/9/08	GCAL1941BRC	WWWW		0.00079	↓	J/UJ/A
+	6/10/08	MCAL7269	JJ	25.94405		F8F130000-280,	J+/A det
+			B	33.13188		+ All water	↓
			EEEE		0.00933	↓	J/UJ/A
			M		0.02516	↓	↓

LDC #: 17078A1
SDG #: all cases

VALIDATION FINDINGS WORKSHEET
Blanks

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

Y N N/A Was a method blank associated with every sample in this SDG?
Y N N/A Was a method blank analyzed at least once every 12 hours for each matrix and concentration?
Y N N/A Was there contamination in the method blanks? If yes, please see the qualifications below.

Blank analysis date: 6/9/08
Conc. units: ug/kg
Associated Samples: All soils

Compound	Blank ID	Sample Identification								
	F8F090000 -367		3							
~~Methylene chloride~~ Dichlorodifluoromethane	1.1		11/4							
~~Acetone~~										
CRQL										

Blank analysis date:
Conc. units:
Associated Samples:

Compound	Blank ID	Sample Identification								
Methylene chloride										
Acetone										
CRQL										

All results were qualified using the criteria stated below except those circled.

Note: Common contaminants such as Methylene chloride, Acetone, 2-Butanone, Carbon disulfide and TICs that were detected in samples within ten times the associated method blank concentration were qualified as not detected, "U". Other contaminants within five times the method blank concentration were also qualified as not detected, "U".

LDC #: 19098A1
SDG #: pe cover

VALIDATION FINDINGS WORKSHEET
Field Blanks

Reviewer: M
2nd Reviewer: R

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

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

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

Field blank type: (circle one) Field Blank / Rinsate / Trip Blank / Other: TB Associated Samples: All soils 7&10X

Compound	Blank ID 4	Blank ID	Sample Identification							
Sampling Date	6/4/08									
Dichloromethane (Methylene chloride)	0.29									
Acetone	0.85									
Chloroform	0.11									
CRQL										

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

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

Compound	Blank ID	Blank ID	Sample Identification							
Sampling Date										
Methylene chloride										
Acetone										
Chloroform										
CRQL										

CIRCLED RESULTS WERE NOT QUALIFIED. ALL RESULTS NOT CIRCLED WERE QUALIFIED BY THE FOLLOWING STATEMENT:
Common contaminants such as Methylene chloride, Acetone, 2-Butanone and Carbon disulfide that were detected in samples within ten times the associated field blank concentration were qualified as not detected, "U". Other contaminants within five times the field blank concentration were also qualified as not detected, "U".

LDC #: 19098A1
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Surrogate Spikes

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

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

Y (N) N/A Were all surrogate %R within QC limits?

Y (N) N/A If the percent recovery (%R) for one or more surrogates was out of QC limits, was a reanalysis performed to confirm samples with %R out of outside of criteria?

#	Date	Sample ID	Surrogate	%Recovery (Limits)	Qualifications
		F8F160000-097	BFB	124 (79-115)	J+/Pdet
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

	QC Limits (Soil)	QC Limits (Water)
SMC1 (TOL) = Toluene-d8	81-117	88-110
SMC2 (BFB) = Bromofluorobenzene	74-121	86-115
SMC3 (DCE) = 1,2-Dichloroethane-d4	80-120	80-120
SMC4 (DFM) = Dibromofluoromethane	80-120	86-118

LDC #: 14098A1
SDG #: Lee cones

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Page: 1 of 1
Reviewer: 5
2nd Reviewer: 8

METHOD : GC/MS VOA (EPA SW 846 Method 8260B)

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

Y N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.

Y N N/A Was a MS/MSD analyzed every 20 samples of each matrix?

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		TSB-FJ-06-20	F	156 (30-150)	( )	( )	none	NO QUAL
		MS/D	Y	( )	151 (34-150)	( )		
			EEEE	( )	( )	24 (20)		
			HH	( )	( )	48 (20)		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

	Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)
H.	1,1-Dichloroethene	59-172%	≤ 22%	61-145%	≤ 14%
S.	Trichloroethene	62-137%	≤ 24%	71-120%	≤ 14%
V.	Benzene	66-142%	≤ 21%	76-127%	≤ 11%
CC	Toluene	59-139%	≤ 21%	76-125%	≤ 13%
DD	Chlorobenzene	60-133%	≤ 21%	75-130%	≤ 13%

LDC #: 17078A1
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Laboratory Control Samples (LCS)

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

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

(Y) N N/A Was a LCS required?
Y (N) N/A Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?

#	Date	LCS/LCSD ID	Compound	LCS %R (Limits)	LCSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
		8165280-LCSD	N	120 (78-117)	( )	( )	F8F130000-280	no QUAL LCSD in
			O	125 (74-124)	( )	( )	4	↓
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
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				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

LDC #: 19098A1
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

METHOD: GC/MS VOA (EPA SW 846 Method 8260B)

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

Compound	Concentration (ug/kg)		RPD
	1	2	
F	15	9.8	5.2 ≤ 21 Difference
Dichloromethane	16	15	1.0 ≤ 5.2

Compound	Concentration ( )		RPD

Compound	Concentration ( )		RPD

Compound	Concentration ( )		RPD

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 4, 2008

LDC Report Date: July 23, 2008

Matrix: Soil

Parameters: Semivolatiles

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-GJ-09-0'
TSB-GJ-09-0'-FD
TSB-GJ-08-0'

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8270C for Semivolatiles.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

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.

A Indicates the finding is based upon technical validation criteria.

P Indicates the finding is related to a protocol/contractual deviation.

None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/MS Instrument Performance Check

Instrument performance was checked at 12 hour intervals.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

Percent relative standard deviations (%RSD) were less than or equal to 15.0% for each individual compound and less than or equal to 30.0% for calibration check compounds (CCCs).

In the case where %RSD was greater than 15.0%, the laboratory used a calibration curve to evaluate the compound. All coefficients of determination (r^2) were greater than or equal to 0.990 .

For the purposes of technical evaluation, all compounds were evaluated against the 30.0% (%RSD) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria.

Average relative response factors (RRF) for all semivolatile target compounds and system performance check compounds (SPCCs) were greater than or equal to 0.05 as required with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/4/08	Phthalic acid	0.02848 (≥0.05)	All samples in SDG F8F050256	J (all detects) UJ (all non-detects)	A

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

Percent differences (%D) between the initial calibration RRF and the continuing calibration RRF were within the method criteria of less than or equal to 20.0% for calibration check compounds (CCCs).

For the purposes of technical evaluation, all compounds were evaluated against the 25.0% (%D) National Functional Guideline criteria. Unless noted above, all compounds were within the validation criteria with the following exceptions:

Date	Compound	%D	Associated Samples	Flag	A or P
6/12/08	Phthalic acid n-(Hydroxymethyl)phthalimide	58.34506 46.18722	All samples in SDG F8F050256	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A

The percent difference (%D) of the second source calibration standard were less than or equal to 25.0% for all compounds.

All of the continuing calibration RRF values were within method and validation criteria with the following exceptions:

Date	Compound	RRF (Limits)	Associated Samples	Flag	A or P
6/12/08	Phthalic acid	0.01186 (≥0.05)	All samples in SDG F8F050256	J (all detects) UJ (all non-detects)	A

V. Blanks

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

Sample "RINSATE 1" (from SDG F8F050256) was identified as a rinsate. No semivolatile contaminants were found in this blank.

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

All internal standard areas and retention times were within QC limits with the following exceptions:

Sample	Internal Standards	Area (Limits)	Compound	Flag	A or P
TSB-GJ-09-0'	Perylene-d12	106970 (270174-1080696)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	A
TSB-GJ-08-0'	Perylene-d12	265070 (270174-1080696)	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	A

XI. Target Compound Identifications

Raw data were not reviewed for this SDG.

XII. Compound Quantitation and CRQLs

Raw data were not reviewed for this SDG.

XIII. Tentatively Identified Compounds (TICs)

Raw data were not reviewed for this SDG.

XIV. System Performance

Raw data were not reviewed for this SDG.

XV. Overall Assessment of Data

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

XVI. Field Duplicates

Samples TSB-GJ-09-0' and TSB-GJ-09-0'-FD were identified as field duplicates. No semivolatiles were detected in any of the samples.

BRC Tronox Parcel G
Semivolatiles - Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Flag	A or P	Reason
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Phthalic acid	J (all detects) UJ (all non-detects)	A	Initial calibration (RRF)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Phthalic acid n-(Hydroxymethyl)phthalimide	J- (all detects) UJ (all non-detects) J- (all detects) UJ (all non-detects)	A	Continuing calibration (%D)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Phthalic acid	J- (all detects) UJ (all non-detects)	A	Continuing calibration (RRF)
F8F050256	TSB-GJ-09-0' TSB-GJ-08-0'	Di-n-octylphthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	J (all detects) UJ (all non-detects)	A	Internal standards (area)

BRC Tronox Parcel G
Semivolatiles - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Semivolatiles - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: 19098A2
SDG #: F8F050256
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III

Date: 7/20/08
Page: 1 of 1
Reviewer:
2nd Reviewer:

METHOD: GC/MS Semivolatiles (EPA SW 846 Method 8270C)

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: 6/4/08
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	SW	% RSD, r^2 ≥ 0.990
IV.	Continuing calibration/ICV	SW	ICV ≤ 25
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	SW	TRX-HR-04-01 MS/D
VIII.	Laboratory control samples	A	LCS
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	SW	
XI.	Target compound identification	N	
XII.	Compound quantitation/CRQLs	N	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	N	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	ND	D = 1 + 2
XVII.	Field blanks	ND	R = Rinsate 1 SDG # F8F050256

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

Validated Samples:

SOIL

1	TSB-GJ-09-0'	11	F8F060000-173	21	8158173	31	KPG6W1AA
2	TSB-GJ-09-0'-FD	12		22		32	
3	TSB-GJ-08-0'	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	

VALIDATION FINDINGS WORKSHEET

PRY

METHOD: GC/MS BNA (EPA SW 846 Method 8270C)

A. Phenol**	P. Bis(2-chloroethoxy)methane	EE. 2,6-Dinitrotoluene	TT. Pentachlorophenol**	III. Benzo(a)pyrene**
B. Bis (2-chloroethyl) ether	Q. 2,4-Dichlorophenol**	FF. 3-Nitroaniline	UU. Phenanthrene	JJJ. Indeno(1,2,3-cd)pyrene
C. 2-Chlorophenol	R. 1,2,4-Trichlorobenzene	GG. Acenaphthene**	VV. Anthracene	KKK. Dibenz(a,h)anthracene
D. 1,3-Dichlorobenzene	S. Naphthalene	HH. 2,4-Dinitrophenol*	WW. Carbazole	LLL. Benzo(g,h,i)perylene
E. 1,4-Dichlorobenzene**	T. 4-Chloroaniline	II. 4-Nitrophenol*	XX. Di-n-butylphthalate	MMM. Bis(2-Chloroisopropyl)ether
F. 1,2-Dichlorobenzene	U. Hexachlorobutadiene**	JJ. Dibenzofuran	YY. Fluoranthene**	NNN. Aniline
G. 2-Methylphenol	V. 4-Chloro-3-methylphenol**	KK. 2,4-Dinitrotoluene	ZZ. Pyrene	OOO. N-Nitrosodimethylamine
H. 2,2'-Oxybis(1-chloropropane)	W. 2-Methylnaphthalene	LL. Diethylphthalate	AAA. Butylbenzylphthalate	PPP. Benzoic Acid
I. 4-Methylphenol	X. Hexachlorocyclopentadiene*	MM. 4-Chlorophenyl-phenyl ether	BBB. 3,3'-Dichlorobenzidine	QQQ. Benzyl alcohol
J. N-Nitroso-di-n-propylamine*	Y. 2,4,6-Trichlorophenol**	NN. Fluorene	CCC. Benzo(a)anthracene	RRR. Pyridine
K. Hexachloroethane	Z. 2,4,5-Trichlorophenol	OO. 4-Nitroaniline	DDD. Chrysene	SSS. Benzidine
L. Nitrobenzene	AA. 2-Chloronaphthalene	PP. 4,6-Dinitro-2-methylphenol	EEE. Bis(2-ethylhexyl)phthalate	TTT.
M. Isophorone	BB. 2-Nitroaniline	QQ. N-Nitrosodiphenylamine (1)**	FFF. Di-n-octylphthalate**	UUU
N. 2-Nitrophenol**	CC. Dimethylphthalate	RR. 4-Bromophenyl-phenylether	GGG. Benzo(b)fluoranthene	VVV.
O. 2,4-Dimethylphenol	DD. Acenaphthylene	SS. Hexachlorobenzene	HHH. Benzo(k)fluoranthene	WWW.

Notes:* = System performance check compound (SPCC) for RRF; ** = Calibration check compound (CCC) for %RSD.

LDC #: 19098A2

SDG #: see cover

METHOD: GC/MS BNA (EPA SW 846 Method 8270)

VALIDATION FINDINGS WORKSHEET

Initial Calibration

Reviewer: [initials]

2nd Reviewer: [initials]

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

Y N N/A Did the laboratory conduct an acceptable 5 point calibration prior to sample analysis?

Y N N/A Were percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCC's and SPCC's?

Y N N/A Was a curve fit used for evaluation? If yes, what was the acceptance criteria used for evaluation?__________

Y N N/A Did the initial calibration meet the acceptance criteria?

Y N N/A Were all %RSDs and RRFs within the validation criteria of ≤30 %RSD and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %RSD (Limit: ≤30.0%)	Finding RRF (Limit: ≥0.05)	Associated Samples	Qualifications
		~~KICAL~~					
	6/4/08	KICALSPEC	Phthalic Acid		0.02848	All + B/K	J/UJ/A

LDC #: 19098A2
SDG #: Pre cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Page: 1 of 1
Reviewer: B
2nd Reviewer: Q

METHOD: GC/MS BNA (EPA SW 846 Method 8270)

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

Y N N/A Was a continuing calibration standard analyzed at least once every 12 hours of sample analysis for each instrument?
Y N N/A Were percent differences (%D) and relative response factors (RRF) within method criteria for all CCC's and SPCC's ?
Y N N/A Were all %D and RRFs within the validation criteria of ≤25 %D and ≥0.05 RRF ?

#	Date	Standard ID	Compound	Finding %D (Limit: ≤25.0%)	Finding RRF (Limit: ≥0.05)	Associated Samples	Qualifications
	6/12/08	ECAL5872	Phthalic Acid		0.01186	All + BLK	J/UJ/A
—			↓	58.34506		↓	J-/UJ/A
—			N(Hydroxymethyl) phthalimide	46.18722			↓

CONCAL.2S

LDC #: 19098A2
SDG #: pc cores

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: GC/MS BNA (EPA SW 846 Method 8270)

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

Y N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.

Y N N/A Was a MS/MSD analyzed every 20 samples of each matrix?

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

#	Date	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	6/13	TRX-HR-04-0' MS/D	AAA	23 (45-104)	17 (45-104)	32 (30)	none	no qual
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
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				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		
				( )	( )	( )		

	Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)		Compound	QC Limits (Soil)	RPD (Soil)	QC Limits (Water)	RPD (Water)
A.	Phenol	26-90%	≤ 35%	12-110%	≤ 42%	GG.	Acenaphthene	31-137%	≤ 19%	46-118%	≤ 31%
C.	2-Chlorophenol	25-102%	≤ 50%	27-123%	≤ 40%	II.	4-Nitrophenol	11-114%	≤ 50%	10-80%	≤ 50%
E.	1,4-Dichlorobenzene	28-104%	≤ 27%	36-97%	≤ 28%	KK.	2,4-Dinitrotoluene	28-89%	≤ 47%	24-96%	≤ 38%
J.	N-Nitroso-di-n-propylamine	41-126%	≤ 38%	41-116%	≤ 38%	TT.	Pentachlorophenol	17-109%	≤ 47%	9-103%	≤ 50%
R.	1,2,4-Trichlorobenzene	38-107%	≤ 23%	39-98%	≤ 28%	ZZ.	Pyrene	35-142%	≤ 36%	26-127%	≤ 31%
V.	4-Chloro-3-methylphenol	26-103%	≤ 33%	23-97%	≤ 42%						

LDC #: 19098A2
SDG #: fc cover

VALIDATION FINDINGS WORKSHEET
Internal Standards

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

METHOD: GC/MS BNA (EPA SW 846 Method 8270)

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

Y N N/A Were all internal standard area counts within -50 to +100 of the associated calibration standard?

Y N N/A Were the retention times of the internal standards within +/- 30 seconds of the retention times of the associated calibration standard?

#	Date	Sample ID	Internal Standard	Area (Limits)	RT (Limits)	Qualifications
		1	PRY	106970 (270174-1080696)		J/UJ/P QUAL
		3	PRY	265070 (↓)		J/UJ/P QUAL

* QC limits are advisory

IS1 (DCB) = 1,4-Dichlorobenzene-d4
IS2 (NPT) = Naphthalene-d8
IS3 (ANT) = Acenaphthene-d10
IS4 (PHN) = Phenanthrene-d10
IS5 (CRY) = Chrysene-d12
IS6 (PRY) = Perylene-d12

LDC Report# 19098A3a

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 4, 2008

LDC Report Date: July 22, 2008

Matrix: Soil

Parameters: Chlorinated Pesticides

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-GJ-09-0'
TSB-GJ-09-0'-FD
TSB-GJ-08-0'

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8081A for Chlorinated Pesticides.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

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.

A Indicates the finding is based upon technical validation criteria.

P Indicates the finding is related to a protocol/contractual deviation.

None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/ECD Instrument Performance Check

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

III. Initial Calibration

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

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

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 15.0% QC limits with the following exceptions:

Date	Standard	Channel	Compound	%D	Associated Samples	Flag	A or P
6/13/08	KCAL892	A	gamma-BHC	15.4	TSB-GJ-08-0'	J+ (all detects)	A
			Endosulfan I	15.6	F8F060000-174	J+ (all detects)	
			Dieldrin	15.7		J+ (all detects)	
			4,4'-DDD	16.9		J+ (all detects)	
			Endosulfan II	16.2		J+ (all detects)	
			Methoxychlor	15.1		J+ (all detects)	
			Endosulfan sulfate	17.1		J+ (all detects)	
			Endrin ketone	16.4		J+ (all detects)	
6/13/08	KCAL943	A	alpha-BHC	17.0	TSB-GJ-09-0'	J+ (all detects)	A
			gamma-BHC	20.5	TSB-GJ-09-0'-FD	J+ (all detects)	
			delta-BHC	20.0		J+ (all detects)	
			Heptachlor	18.7		J+ (all detects)	
			Aldrin	15.1		J+ (all detects)	
			Heptachlor epoxide	19.5		J+ (all detects)	
			gamma-Chlordane	17.8		J+ (all detects)	
			Endosulfan I	22.1		J+ (all detects)	
			4,4'-DDE	15.7		J+ (all detects)	
			Dieldrin	18.3		J+ (all detects)	
			Endrin	15.3		J+ (all detects)	
			4,4'-DDD	18.5		J+ (all detects)	
			Endosulfan II	17.8		J+ (all detects)	

Date	Standard	Channel	Compound	%D	Associated Samples	Flag	A or P
6/30/08	KCAL943	B	gamma-BHC	16.7	TSB-GJ-09-0'	J+ (all detects)	A
			delta-BHC	17.9	TSB-GJ-09-0'-FD	J+ (all detects)	
			Endosulfan I	18.3		J+ (all detects)	
			Dieldrin	15.4		J+ (all detects)	
			4,4'-DDD	19.5		J+ (all detects)	

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

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

V. Blanks

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

Sample "RINSATE 1" (from SDG F8F050256) was identified as a rinsate. No chlorinated pesticide contaminants were found in this blank.

VI. Surrogate Spikes

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for several samples. Since these samples were diluted out, no data were qualified.

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Pesticide Cleanup Checks

a. Florisil Cartridge Check

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

b. GPC Calibration

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

XI. Target Compound Identification

Raw data were not reviewed for this SDG.

XII. Compound Quantitation and Reported CRQLs

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

Samples TSB-GJ-09-0' and TSB-GJ-09-0'-FD were identified as field duplicates. No chlorinated pesticides were detected in any of the samples with the following exceptions:

Compound	Concentration (ug/Kg)		RPD (Limits)	Difference (Limits)	Flag	A or P
	TSB-GJ-09-0'	TSB-GJ-09-0'-FD				
beta-BHC	45	41	-	4.0 (≤8.8)	-	-
4,4'-DDE	16	14	-	2.0 (≤8.8)	-	-
4,4'-DDT	17	14	-	3.0 (≤8.8)	-	-

BRC Tronox Parcel G
Chlorinated Pesticides - Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Flag	A or P	Reason
F8F050256	TSB-GJ-08-0'	gamma-BHC Endosulfan I Dieldrin 4,4'-DDD Endosulfan II Methoxychlor Endosulfan sulfate Endrin ketone	J+ (all detects) J+ (all detects) J+ (all detects) J+ (all detects) J+ (all detects) J+ (all detects) J+ (all detects) J+ (all detects)	A	Continuing calibration (%D)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD	alpha-BHC gamma-BHC delta-BHC Heptachlor Aldrin Heptachlor epoxide gamma-Chlordane Endosulfan I 4,4'-DDE Dieldrin Endrin 4,4'-DDD Endosulfan II	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) J+ (all detects) J+ (all detects) J+ (all detects) J+ (all detects)	A	Continuing calibration (%D)

BRC Tronox Parcel G
Chlorinated Pesticides - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Chlorinated Pesticides - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: 19098A3a
SDG #: F8F050256
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III

Date: 7/21/08
Page: 1 of 1
Reviewer:
2nd Reviewer:

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

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/4/08
II.	GC/ECD Instrument Performance Check	A	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	SW	
V.	Blanks	A	
VI.	Surrogate spikes	SW	
VII.	Matrix spike/Matrix spike duplicates	SW	TRX-HR-04-0'
VIII.	Laboratory control samples	A	LCS
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	SW	D = 1 + 2
XV.	Field blanks	ND	R = Rinsate / SDG# F8F050256

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

Validated Samples:

SOIL

1 +	TSB-GJ-09-0'	11	87	21		31	
2 +	TSB-GJ-09-0'-FD	12		22		32	
3 +	TSB-GJ-08-0'	13		23		33	
4	F8F060000-174	14	8158174	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	

VALIDATION FINDINGS WORKSHEET

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

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

Notes:

LDC #: 19098A3g
SDG #: all cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

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

METHOD: V GC __ HPLC

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
What type of continuing calibration calculation was performed? __%D or __RPD
Y N N/A Were continuing calibration standards analyzed at the required frequencies?
Y N N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ≤15.0%?
Level IV Only
Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ 15.0)	RT (limit)	Associated Samples	Qualifications
+	6/13/08	KCAL892	ch A	D	15.4	( )	F8F060000-174,	J+/A det
+				H	15.6	( )	3	
+				I	15.7	( )		
+				M	16.9	( )		
+				L	16.2	( )		
+				P	15.1	( )		
+				N	17.1	( )		
				Q	16.4	( )		
						( )		
	6/13/08	KCAL943	ch A	A	17.0	( )	1, 2	
				D	20.5	( )		
				C	20.0	( )		
				E	18.7	( )		
				F	15.1	( )		
				G	19.5	( )		
				T	17.8	( )		
				H	22.1	( )		
				J	15.7	( )		
				I	18.3	( )		
				K	15.3	( )		
				M	18.5	( )		
				L	17.8	( )		

LDC #: 19098 A3a
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: ✓ GC ___ HPLC

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
What type of continuing calibration calculation was performed? ___%D or ___RPD
(Y) N N/A — Were continuing calibration standards analyzed at the required frequencies?
Y (N) N/A — Did the continuing calibration standards meet the %D / RPD validation criteria of ≤15.0%?
Level IV Only
Y N (N/A) — Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ 15.0)	RT (limit)	Associated Samples	Qualifications
	6/30/08	KeAL943	ch B	D	16.7	( )	1, 2	J+/A det
				C	17.9	( )	↓	↓
				H	18.3	( )		
				I	15.4	( )		
				M	19.5	( )		
						( )		
						( )		
						( )		
						( )		
						( )		
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LDC #: 19098A3c
SDG #: pw cover

VALIDATION FINDINDS WORKSHEET
Surrogate Recovery

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

METHOD: GC __ HPLC

Are surrogates required by the method? Yes____ or No____.

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

Y (N) N/A Were surrogates spiked into all samples and blanks?

Y N (N/A) Did all surrogate recoveries (%R) meet the QC limits?

#	Sample ID	Detector/ Column	Surrogate Compound	%R (Limits)	Qualifications
	1, 2 (5X)	not specified	Y	DO (55-115)	no qual
			0	DO (63-117)	↓
				( )	
	3 (40X)	↓	↓	↓ ( )	no qual
				↓ ( )	↓
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	

	Surrogate Compound		Surrogate Compound		Surrogate Compound		Surrogate Compound		
A	Chlorobenzene (CBZ)	G	Octacosane	M	Benzo(e)Pyrene	S	1-Chloro-3-Nitrobenzene	Y	Tetrachloro-m- xylene
B	4-Bromofluorobenzene (BFB)	H	Ortho-Terphenyl	N	Terphenyl-D14	T	3,4-Dinitrotoluene		
C	a,a,a-Trifluorotoluene	I	Fluorobenzene (FBZ)	O	Decachlorobiphenyl (DCB)	U	Tripentyltin		
D	Bromochlorobenene	J	n-Triacontane	P	1-methylnaphthalene	V	Tri-n-propyltin		
E	1,4-Dichlorobutane	K	Hexacosane	Q	Dichlorophenyl Acetic Acid (DCAA)	W	Tributyl Phosphate		
F	1,4-Difluorobenzene (DFB)	L	Bromobenzene	R	4-Nitrophenol	X	Triphenyl Phosphate		

LDC #: 19098A3c
SDG #: ______

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: A
2nd Reviewer: 2

METHOD: ✓ GC __ HPLC

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

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

#	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	TRX-HR-04-0	several	compounds'	%R +)	%RPD ( )	none	no qual
	MS/D	did	not meet	criteria)	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
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			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		

LDC #: 19098A39
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

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

METHOD: ~~GC~~ HPLC

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

Compound	Concentration (ug/kg)		%RPD Limit Difference	Qualification Parent only / All Samples
	1	2		
B	45	41	4.0 ≤ 8.8	
J	16	14	2.0 ≤ 8.8	
O	17	14	3.0 ≤ 8.8	

Compound	Concentration ( )		%RPD Limit _____	Qualification Parent only / All Samples

FLDUPNew.wpd

LDC Report# 19098A3b

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 4, 2008

LDC Report Date: July 22, 2008

Matrix: Soil

Parameters: Polychlorinated Biphenyls

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-GJ-09-0'
TSB-GJ-09-0'-FD
TSB-GJ-08-0'

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8082 for Polychlorinated Biphenyls.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

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.

A Indicates the finding is based upon technical validation criteria.

P Indicates the finding is related to a protocol/contractual deviation.

None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. GC/ECD Instrument Performance Check

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

III. Initial Calibration

Initial calibration of multicomponent compounds was performed for the primary (quantitation) column as required by the method.

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

IV. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 15.0% QC limits.

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

V. Blanks

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

No field blanks were identified in this SDG.

VI. Surrogate Spikes

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

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

VIII. Laboratory Control Samples (LCS)

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

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Pesticide Cleanup Checks

a. Florisil Cartridge Check

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

b. GPC Calibration

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

XI. Target Compound Identification

Raw data were not reviewed for this SDG.

XII. Compound Quantitation and Reported CRQLs

Raw data were not reviewed for this SDG.

XIII. Overall Assessment of Data

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

XIV. Field Duplicates

Samples TSB-GJ-09-0' and TSB-GJ-09-0'-FD were identified as field duplicates. No polychlorinated biphenyls were detected in any of the samples.

BRC Tronox Parcel G
Polychlorinated Biphenyls - Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Polychlorinated Biphenyls - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Polychlorinated Biphenyls - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: 19098A3b
SDG #: F8F050256
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III

Date: 7/20/08
Page: 1 of 1
Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: GC Polychlorinated Biphenyls (EPA SW 846 Method 8082)

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: 6/4/08
II.	GC/ECD Instrument Performance Check	NA	
III.	Initial calibration	A	
IV.	Continuing calibration/ICV	A	ICV ≤ 15
V.	Blanks	A	
VI.	Surrogate spikes	A	
VII.	Matrix spike/Matrix spike duplicates	SW	TSB-FR-02-02-0'
VIII.	Laboratory control samples	A	LCS
IX.	Regional quality assurance and quality control	N	
Xa.	Florisil cartridge check	N	
Xb.	GPC Calibration	N	
XI.	Target compound identification	N	
XII.	Compound quantitation and reported CRQLs	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	ND	D = 1+2
XV.	Field blanks	N	

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

Validated Samples: SOIL SOIL

1	TSB-GJ-09-0'	11		21		31	
2	TSB-GJ-09-0'-FD	12		22		32	
3	TSB-GJ-08-0'	13		23		33	
4		14		24		34	
5	F8F090000-208	15	8/6/2008	25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

LDC #: 19098A3b
SDG #: pre cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: FT
2nd Reviewer: [illegible]

METHOD: ___ GC ___ HPLC

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

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

#	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	TSB-FR-02-02-OMS/D	BB	457 (39-150)	410 (39-150)	( )	ND	no Qual
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		

LDC Report# 19098A4

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 4, 2008

LDC Report Date: July 28, 2008

Matrix: Soil

Parameters: Metals

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-GJ-09-0'
TSB-GJ-09-0'-FD
TSB-GJ-08-0'

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Methods 6010B, 6020, and 7000 for Metals. The metals analyzed were Aluminum, Antimony, Arsenic, Barium, Beryllium, Boron, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Lithium, Magnesium, Manganese, Molybdenum, Mercury, Nickel, Niobium, Palladium, Phosphorus, Platinum, Potassium, Selenium, Silicon, Silver, Sodium, Strontium, Sulfur, Thallium, Tin, Titanium, Tungsten, Uranium, Vanadium, Zinc, and Zirconium.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004) as there are no current guidelines for the methods stated above.

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

Blanks are summarized in Section III.

Field duplicates are summarized in Section XIII.

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.

A Indicates the finding is based upon technical validation criteria.

P Indicates the finding is related to a protocol/contractual deviation.

None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

An initial calibration was performed.

The frequency and analysis criteria of the initial calibration verification (ICV) and continuing calibration verification (CCV) were met.

III. Blanks

Method blanks were reviewed for each matrix as applicable. No contaminant concentrations were found in the initial, continuing and preparation blanks with the following exceptions:

Method Blank ID	Analyte	Maximum Concentration	Associated Samples
PB (prep blank)	Barium	0.20 mg/Kg	All samples in SDG F8F050256
ICB/CCB	Antimony Arsenic Cadmium Tungsten Vanadium	2.7 ug/L 1.0 ug/L 0.2 ug/L 1.9 ug/L 3.0 ug/L	All samples in SDG F8F050256

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	Analyte	Reported Concentration	Modified Final Concentration
TSB-GJ-09-0'	Cadmium	0.098 mg/Kg	0.10U mg/Kg

No field blanks were identified in this SDG.

IV. ICP Interference Check Sample (ICS) Analysis

The frequency of analysis was met.

The criteria for analysis were met.

V. Matrix Spike Analysis

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were within QC limits with the following exceptions:

Spike ID (Associated Samples)	Analyte	MS (%R) (Limits)	MSD (%R) (Limits)	RPD (Limits)	Flag	A or P
TRX-HR-04-0' (All samples in SDG F8F050256)	Sulfur	72.8 (75-125)	-	-	J- (all detects) UJ (all non-detects)	A
	Antimony	47.7 (75-125)	56.6 (75-125)	-		
	Barium	70.6 (75-125)	-	-		
	Chromium	72.0 (75-125)	-	-		
	Cobalt	72.4 (75-125)	-	-		
	Copper	70.4 (75-125)	-	-		
	Nickel	69.3 (75-125)	50.7 (75-125)	-		
	Niobium	44.1 (75-125)	-	-		
	Potassium	59.5 (75-125)	-	-		
	Selenium	74.5 (75-125)	-	-		
	Tungsten	63.7 (75-125)	-	-		
	Vanadium	70.8 (75-125)	-	-		
	Zirconium	52.8 (75-125)	66.6 (75-125)	-		
TRX-HR-04-0' (All samples in SDG F8F050256)	Magnesium	43.2 (75-125)	144.7 (75-125)	-	J (all detects) UJ (all non-detects)	A
	Zinc	53.0 (75-125)	131.6 (75-125)	-	J (all detects) UJ (all non-detects)	
TRX-HR-04-0' (All samples in SDG F8F050256)	Silicon	221.9 (75-125)	336.9 (75-125)	-	J+ (all detects)	A
	Phosphorus	-	128.2 (75-125)	-	J+ (all detects)	
TRX-HR-04-0' (All samples in SDG F8F050256)	Strontium	20.7	-	-	J- (all detects) R (all non-detects)	A

VI. Duplicate Sample Analysis

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable.

VII. Laboratory Control Samples (LCS)

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

VIII. Internal Standards (ICP-MS)

Raw data were not reviewed for this SDG.

IX. Furnace Atomic Absorption QC

Graphite furnace atomic absorption was not utilized in this SDG.

X. ICP Serial Dilution

ICP serial dilution analysis was performed by the laboratory. The analysis criteria were met with the following exceptions:

Diluted Sample	Analyte	%D (Limits)	Associated Samples	Flag	A or P
TRX-HR-04-0'L	Iron Strontium	14.3 (≤10) 11.4 (≤10)	All samples in SDG F8F050256	J (all detects) J (all detects)	A

XI. Sample Result Verification

Raw data were not reviewed for this SDG.

XII. Overall Assessment of Data

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

XIII. Field Duplicates

Samples TSB-GJ-09-0' and TSB-GJ-09-0'-FD were identified as field duplicates. No metals were detected in any of the samples with the following exceptions:

Analyte	Concentration (mg/Kg)		RPD (Limits)	Difference (Limits)	Flag	A or P
	TSB-GJ-09-0'	TSB-GJ-09-0'-FD				
Aluminum	6680	7890	17 (≤50)	-	-	-
Arsenic	3.2	3.3	-	0.1 (≤2.1)	-	-
Barium	230	211	9 (≤50)	-	-	-
Beryllium	0.46	0.55	-	0.09 (≤0.21)	-	-
Boron	8	10.3	-	2.3 (≤20.7)	-	-
Cadmium	0.098	0.11	-	0.012 (≤0.10)	-	-
Calcium	47500	42400	11 (≤50)	-	-	-
Chromium	8.1	10.3	24 (≤50)	-	-	-
Cobalt	7.9	6.9	14 (≤50)	-	-	-

Analyte	Concentration (mg/Kg)		RPD (Limits)	Difference (Limits)	Flag	A or P
	TSB-GJ-09-0'	TSB-GJ-09-0'-FD				
Copper	14	15.3	9 (≤50)	-	-	-
Iron	10800	12200	12 (≤50)	-	-	-
Lead	12.3	10.9	12 (≤50)	-	-	-
Magnesium	11300	13400	17 (≤50)	-	-	-
Manganese	603	447	30 (≤50)	-	-	-
Molybdenum	0.77	0.98	-	0.21 (≤1.0)	-	-
Nickel	13.6	15	10 (≤50)	-	-	-
Palladium	0.6	0.57	-	0.03 (≤0.21)	-	-
Phosphorus	908	868	5 (≤50)	-	-	-
Potassium	1520	1840	19 (≤50)	-	-	-
Silicon	133	158	-	25 (≤51.7)	-	-
Silver	0.14	0.18	-	0.04 (≤0.18)	-	-
Sodium	1810	1720	5 (≤50)	-	-	-
Strontium	287	267	7 (≤50)	-	-	-
Tin	0.43	0.49	-	0.06 (≤0.41)	-	-
Titanium	436	505	15 (≤50)	-	-	-
Uranium	1.5	1.4	7 (≤50)	-	-	-
Vanadium	33.6	37.2	10 (≤50)	-	-	-
Zinc	33.5	35.8	7 (≤50)	-	-	-
Zirconium	18.1	22.2	-	4.1 (≤20.7)	-	-
Lithium	24	20.4	-	3.6 (≤51.7)	-	-

Analyte	Concentration (mg/Kg)		RPD (Limits)	Difference (Limits)	Flag	A or P
	TSB-GJ-09-0'	TSB-GJ-09-0'-FD				
Sulfur	1740	1410	-	330 (≤1030)	-	-

BRC Tronox Parcel G
Metals - Data Qualification Summary - SDG F8F050256

SDG	Sample	Analyte	Flag	A or P	Reason
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Sulfur Antimony Barium Chromium Cobalt Copper Nickel Niobium Potassium Selenium Tungsten Vanadium Zirconium	J- (all detects) UJ (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Magnesium Zinc	J (all detects) UJ (all non-detects) J (all detects) UJ (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Silicon Phosphorus	J+ (all detects) J+ (all detects)	A	Matrix spike/Matrix spike duplicates (%R)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Strontium	J- (all detects) R (all non-detects)	A	Matrix spike/Matrix spike duplicates (%R)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Iron Strontium	J (all detects) J (all detects)	A	ICP serial dilution (%D)

BRC Tronox Parcel G
Metals - Laboratory Blank Data Qualification Summary - SDG F8F050256

SDG	Sample	Analyte	Modified Final Concentration	A or P
F8F050256	TSB-GJ-09-0'	Cadmium	0.10U mg/Kg	A

BRC Tronox Parcel G
Metals - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: 19098A4
SDG #: F8F050256
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III

Date: 7/27/08
Page: 1 of 1
Reviewer: vm
2nd Reviewer: [illegible]

METHOD: Metals (EPA SW 846 Method 6020/6010B/7000)

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: 6/4/08
II.	Calibration	A ~~SW~~	
III.	Blanks	SW	
IV.	ICP Interference Check Sample (ICS) Analysis	A	
V.	Matrix Spike Analysis	SW	3 MS/MSD
VI.	Duplicate Sample Analysis	N	
VII.	Laboratory Control Samples (LCS)	A	LCS
VIII.	Internal Standard (ICP-MS)	N	Mt reviewed
IX.	Furnace Atomic Absorption QC	N	Mt utilized
X.	ICP Serial Dilution	SW	
XI.	Sample Result Verification	N	
XII.	Overall Assessment of Data	A	
XIII.	Field Duplicates	SW	(1,2)
XIV.	Field Blanks	N	

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

Validated Samples: Soil

1	TSB-GJ-09-0'	11		21		31	
2	TSB-GJ-09-0'-FD	12		22		32	
3	TSB-GJ-08-0'	13		23		33	
4	PB	14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 19078A4

SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Element Reference

Page: 1 of 1

Reviewer: [illegible]

2nd reviewer: [illegible]

All circled elements are applicable to each sample.

Sample ID	Matrix	Target Analyte List (TAL)
1-3	Soil	Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, ___
1-3	Soil	Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___
		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Li, S, Zr, ___

Analysis Method

Method		Elements
ICP		Li, S, ___
ICP-MS		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si ___
ICP-MS		Nb, Pd, P, Pt, Sn, Sr, Ti, W, U, Zr, ___
GFAA		Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Tl, V, Zn, Mo, B, Si, CN⁻

Comments: Mercury by CVAA if performed

Nb: Niobium, Pd: Palladium, P: Phosphorus, Pt: Platinum, S: Sulfur, W: Tungsten, U: Uranium, Zr: Zirconium

LDC #: 19098A4
SDG #: See Cover
METHOD: Trace Metals (EPA SW 846 Method 6010/6020/7000)
Sample Concentration units, unless otherwise noted: mg/Kg

VALIDATION FINDINGS WORKSHEET
PB/ICB/CCB QUALIFIED SAMPLES
Soil preparation factor applied: _____
Associated Samples: All

Reviewer: _____
2nd Reviewer: _____

					Sample Identification									
Analyte	Maximum PB[a] (mg/Kg)	Maximum PB[a] (ug/l)	Maximum ICB/CCB[a] (ug/l)	Blank Action Limit	1									
Sb			2.7	0.54										
As			1.0											
Ba	0.20													
Cd			0.2		0.098 / 0.10									
W			1.9											
V			3.0											

Samples with analyte concentrations within five times the associated ICB, CCB or PB concentration are listed above with the identifications from the Validation Completeness Worksheet. These sample results were qualified as not detected, "U".
Note : a - The listed analyte concentration is the highest ICB, CCB, or PB detected in the analysis of each element.

LDC #: 19098A4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: MM
2nd Reviewer: [illegible]

METHOD: Trace metals (EPA SW 846 Method 6010/7000)

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

(Y) N N/A Was a matrix spike analyzed for each matrix in this SDG?

Y (N) N/A Were matrix spike percent recoveries (%R) within the control limits of 75-125? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.

Y (N) N/A Were all duplicate sample relative percent differences (RPD) ≤ 20% for water samples and ≤35% for soil samples?

LEVEL IV ONLY:

Y N (N/A) Were recalculated results acceptable? See Level IV Recalculation Worksheet for recalculations.

#	MS/MSD ID	Matrix	Analyte	MS %Recovery	MSD %Recovery	RPD (Limits)	Associated Samples	Qualifications
1	TRX-HR-04-0'	Soil	S	72.8			All	J-/UJ/A
			Sb	47.7	56.6			
			Ba	70.6				
			Cr	72.0				
			Co	72.4				
			Cu	70.4				
			Mg	43.2	144.7			J/UJ/A
			Ni	69.3	50.7			J-/UJ/A
			Nb	44.1				
			K	59.5				
			Se	74.5				
			Si	221.9	336.9			J+ Lt/A
			Sr	20.7				J-/R/A
			W	63.7				J-/UJ/A
			V	70.8				
			Zn	53.0	131.6			J/UJ/A
			Zr	52.8	66.6			J-/UJ/A
			P		128.2			J+ Lt/A

Comments: Al, Ca, Fe, Mn, Na, Ti, >4X

LDC #: 19098A4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: MM
2nd Reviewer: [signature]

METHOD: Trace metals (EPA SW 846 Method 6010/7000)

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

(Y) N N/A Was a matrix spike analyzed for each matrix in this SDG?

Y (N) N/A Were matrix spike percent recoveries (%R) within the control limits of 75-125? If the sample concentration exceeded the spike concentration by a factor of 4 or more, no action was taken.

Y (N) N/A Were all duplicate sample relative percent differences (RPD) ≤ 20% for water samples and ≤35% for soil samples?

LEVEL IV ONLY:

Y N (N/A) Were recalculated results acceptable? See Level IV Recalculation Worksheet for recalculations.

#	MS/MSD ID	Matrix	Analyte	MS %Recovery	MSD %Recovery	RPD (Limits) 5xp	Associated Samples	Qualifications
2	TRX-HR-04-0	Soil	Li			22.4	All	No qual (LCS/Dup)
			Al			21.9		
			Cr			24.7		
			Co			24.8		
			Fe			23.7		
			Mg			22.4		
			Mn			42.4		
			K			21.2		
			Sr			25.2		
			Ti			26.8		
			V			20.3		
			Zn			34.3		
			Si			24.8		

Comments:

LDC #: 19098A4
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
ICP Serial Dilution

Reviewer: ✓
2nd Reviewer: ✓

METHOD: Trace Metals (EPA SW 846 Method 6010/6020/7000)

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

(Y) N N/A   If analyte concentrations were > 50X the MDL (ICP) ,or >100X the MDL (ICP/MS), was a serial dilution analyzed?
Y (N) N/A   Were ICP serial dilution percent differences (%D) ≤10%?
Y (N) N/A   Is there evidence of negative interference? If yes, professional judgement will be used to qualify the data.

LEVEL IV ONLY:
Y N (N/A)   Were recalculated results acceptable? See Level IV Recalculation Worksheet for recalculations.

#	Date	Diluted Sample ID	Matrix	Analyte	%D (Limits)	Associated Samples	Qualifications
1		TRX-HR-04-01	Soil	Fe	14.3	All	J det/A
				Sr	11.4	↓	↓

Comments:

LDC#: 19098A4
SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: Metals (EPA Method 6010B/6020/7000)

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

Compound	Concentration (mg/kg) 1	Concentration (mg/kg) 2	(≤50) RPD	(mg/Kg) Difference	(mg/Kg) Limits	Qualifications (Parent Only)
Aluminum	6680	7890	17			
Arsenic	3.2	3.3		0.1	(≤2.1)	
Barium	230	211	9			
Beryllium	0.46	0.55		0.09	(≤0.21)	
Boron	8.0	10.3		2.3	(≤20.7)	
Cadmium	0.098	0.11		0.012	(≤0.10)	
Calcium	47500	42400	11			
Chromium	8.1	10.3	24			
Cobalt	7.9	6.9	14			
Copper	14.0	15.3	9			
Iron	10800	12200	12			
Lead	12.3	10.9	12			
Magnesium	11300	13400	17			
Manganese	603	447	30			
Molybdenum	0.77	0.98		0.21	(≤1.0)	
Nickel	13.6	15.0	10			
Palladium	0.60	0.57		0.03	(≤0.21)	
Phosphorus	908	868	5			
Potassium	1520	1840	19			

LDC#: 17809A4
SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer: V
2nd Reviewer: V

METHOD: Metals (EPA Method 6010B/6020/7000)

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

Compound	Concentration (mg/kg) 1	Concentration (mg/kg) 2	(≤50) RPD	(mg/Kg) Difference	(mg/Kg) Limits	Qualifications (Parent Only)
Silicon	133	158		25	(≤51.7)	
Silver	0.14	0.18		0.04	(≤0.18)	
Sodium	1810	1720	5	~~0.06~~	~~≤ 0.12~~	
Strontium	287	267	7			
Tin	0.43	0.49		0.06	(≤0.41)	
Titanium	436	505	15			
Uranium	1.5	1.4	7			
Vanadium	33.6	37.2	10			
Zinc	33.5	35.8	7			
Zirconium	18.1	22.2		4.1	(≤20.7)	
Lithium	24.0	20.4		3.6	(≤51.7	
Sulfur	1740	1410		330	(≤1030)	

LDC Report# 19098A6

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 4, 2008

LDC Report Date: July 28, 2008

Matrix: Soil

Parameters: Wet Chemistry

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-GJ-09-0'
TSB-GJ-09-0'-FD
TSB-GJ-08-0'

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA Method 300.0 for Bromide, Bromine, Chlorate, Chloride, Chorine, Fluoride, Nitrate as Nitrogen, Nitrite as Nitrogen, Orthophosphate as Phosphorus, and Sulfate and EPA SW846 Method 9071B for Oil and Grease.

The review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (October 2004) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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.

A Indicates the finding is based upon technical validation criteria.

P Indicates the finding is related to a protocol/contractual deviation.

None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

All criteria for the initial calibration of each method were met.

b. Calibration Verification

Calibration verification frequency and analysis criteria were met for each method when applicable with the following exceptions:

Sample	Analyte	Finding	Criteria	Flag	A or P
All samples in SDG F8F050256	Chlorate	Continuing calibration was not performed for these compounds.	Continuing calibration must be performed for each compound.	J (all detects) UJ (all non-detects)	P

III. Blanks

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

No field blanks were identified in this SDG.

IV. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) samples were reviewed for each matrix as applicable. Percent recoveries (%R) were within QC limits.

V. Duplicates

Duplicate (DUP) sample analyses were reviewed for each matrix as applicable. Results were within QC limits.

VI. Laboratory Control Samples

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

VII. Sample Result Verification

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples TSB-GJ-09-0' and TSB-GJ-09-0'-FD were identified as field duplicates. No contaminant concentrations were detected in any of the samples with the following exceptions:

Analyte	Concentration (mg/Kg)		RPD (Limits)	Difference (Limits)	Flag	A or P
	TSB-GJ-09-0'	TSB-GJ-09-0'-FD				
Bromide	8.5	5.1	-	3.4 (≤2.6)	J (all detects)	A
Bromine	17.1	10.1	-	7 (≤5.2)	J (all detects)	A
Chlorate	253	185	31 (≤50)	-	-	-
Chloride	7960	5740	32 (≤50)	-	-	-
Chlorine	15900	10900	37 (≤50)	-	-	-
Fluoride	0.43	0.57	-	0.14 (≤1.0)	-	-
Nitrate as N	156	102	42 (≤50)	-	-	-
Sulfate	3310	2160	42 (≤50)	-	-	-

BRC Tronox Parcel G
Wet Chemistry - Data Qualification Summary - SDG F8F050256

SDG	Sample	Analyte	Flag	A or P	Reason
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Chlorate	J (all detects) UJ (all non-detects)	P	Calibration
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD	Bromide Bromine	J (all detects) J (all detects)	A	Field duplicates (RPD)

BRC Tronox Parcel G
Wet Chemistry - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Wet Chemistry - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: 19098A6 **VALIDATION COMPLETENESS WORKSHEET** Date: 7/31/08
SDG #: F8F050256 Level III Page: 1 of 1
Laboratory: Test America Reviewer: W
2nd Reviewer: [illegible]

METHOD: (Analyte) Bromide, Bromine, Chlorate, Chloride, Chorine, Fluoride, Nitrate, Nitrite, Orthophosphate-P, Sulfate (EPA Method 300.0), O & G (EPA SW846 Method 9071B)

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: 6/4/08
IIa.	Initial calibration	A	
IIb.	Calibration verification	SW	
III.	Blanks	A	
IV	Matrix Spike/Matrix Spike Duplicates	A	3 MS/Dup
V	Duplicates	A	
VI.	Laboratory control samples	A	LCS
VII.	Sample result verification	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	SW	(1,2)
X	Field blanks	N	

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

Validated Samples: Soil

1	TSB-GJ-09-0'	11		21		31	
2	TSB-GJ-09-0'-FD	12		22		32	
3	TSB-GJ-08-0'	13		23		33	
4		14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

LDC #: 19098A6
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Sample Specific Analysis Reference

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

All circled methods are applicable to each sample.

Sample ID	Matrix	Parameter
1-3	soil	Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH
		Br Bromine Cl Chlorine F NO_3 NO_2 SO_4 O-PO_4 Chlorate ClO_4 O+G/TPH

Comments:

LDC #: 19098A6
SDG #: See cover

VALIDATION FINDINGS WORKSHEET
Calibration

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: Inorganics, EPA Method See cover

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

Y N N/A Were all instruments calibrated daily, each set-up time, and were the proper number of standards used?
Y N N/A Were all initial and continuing calibration verification percent recoveries (%R) within the control limits of 90-110% ?
Y N N/A Are all correlation coefficients ≥0.995 ?

LEVEL IV/D ONLY:

Y N N/A Were recalculated results acceptable? See Level IV Initial and Continuing Calibration Recaluculation Worksheet for recalulations.
Y N N/A Was a balance check conducted prior to the TDS analysis.?
Y N N/A Was the titrant normality checked?

#	Date	Calibration ID	Analyte	%R	Associated Samples	Qualifications
1	6/17/08	No ccvs	ClO_2 (chlorite)		All	UJ/UJ/P

Comments:

LDC#: 19098A6
SDG#: See Cover

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Reviewer:
2nd Reviewer:

Inorganics, Method: See Cover

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

Analyte	Concentration (mg/Kg)		RPD (≤50)	Difference	Limits	Qualification (Parent only)
	1	2				
Bromide	8.5	5.1		3.4	(≤2.6)	J det / A
Bromine	17.1	10.1		7	(≤5.2)	J det / A
Chlorate	253	185	31			
Chloride	7960	5740	32			
Chlorine	15900	10900	37			
Fluoride	0.43	0.57		0.14	(≤1.0)	
Nitrate as N	156	102	42			
Sulfate	3310	2160	42			

V:\FIELD DUPLICATES\FD_inorganic\19098A6.wpd

LDC Report# 19098A7

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 4, 2008

LDC Report Date: July 22, 2008

Matrix: Soil

Parameters: Gasoline Range Organics

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-GJ-09-0'
TSB-GJ-09-0'-FD
TSB-GJ-08-0'

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Gasoline Range Organics.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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.

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.

A Indicates the finding is based upon technical validation criteria.

P Indicates the finding is related to a protocol/contractual deviation.

None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed as required by the method.

The percent relative standard deviations (%RSD) of calibration factors for compounds were less than 20.0% .

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 15.0% QC limits.

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

III. Blanks

Method blanks were reviewed for each matrix as applicable. No gasoline range organic contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were within QC limits.

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Compound Quantitation and CRQLs

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples TSB-GJ-09-0' and TSB-GJ-09-0'-FD were identified as field duplicates. No gasoline range organics were detected in any of the samples.

BRC Tronox Parcel G
Gasoline Range Organics - Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Gasoline Range Organics - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Gasoline Range Organics - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: 19098A7
SDG #: F8F050256
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III

Date: 7/20/08
Page: 1 of 1
Reviewer:
2nd Reviewer:

METHOD: GC Gasoline Range Organics (EPA SW846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/4/08
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	A	ICV ≤ 15
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	A	TSB-FR-02-02-0'
IVc.	Laboratory control samples	A	LCS/D
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D = 1 & 2
X.	Field blanks	N	

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

Validated Samples: SOIL

1	TSB-GJ-09-0'	11		21		31	
2	TSB-GJ-09-0'-FD	12		22		32	
3	TSB-GJ-08-0'	13		23		33	
4		14		24		34	
5	F8F120000-169	15	8164169	25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes:

LDC Report# 19098A8

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 4, 2008

LDC Report Date: July 22, 2008

Matrix: Soil

Parameters: Diesel Range Organics

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-GJ-09-0'
TSB-GJ-09-0'-FD
TSB-GJ-08-0'

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8015B for Diesel Range Organics.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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.

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.

A Indicates the finding is based upon technical validation criteria.

P Indicates the finding is related to a protocol/contractual deviation.

None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed as required by the method.

The percent relative standard deviations (%RSD) of calibration factors for compounds were less than 20.0% .

b. Calibration Verification

Calibration verification was performed at required frequencies. The percent differences (%D) of amounts in continuing standard mixtures were within the 15.0% QC limits.

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds.

III. Blanks

Method blanks were reviewed for each matrix as applicable. No diesel range organic contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

Surrogates were added to all samples and blanks as required by the method. Surrogate recoveries (%R) were not within QC limits for samples TSB-GJ-09-0' and TSB-GJ-08-0'. Since these samples were diluted out, no data were qualified.

b. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Compound Quantitation and CRQLs

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples TSB-GJ-09-0' and TSB-GJ-09-0'-FD were identified as field duplicates. No diesel range organics were detected in any of the samples.

BRC Tronox Parcel G
Diesel Range Organics - Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Diesel Range Organics - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Diesel Range Organics - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: 19098A8 **VALIDATION COMPLETENESS WORKSHEET** Date: 7/20/08
SDG #: F8F050256 Level III Page: 1 of 1
Laboratory: Test America Reviewer: M
2nd Reviewer: Q

METHOD: GC Diesel Range Organics (EPA SW846 Method 8015B)

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

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: 6/4/08
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	A	ICV ≤ 15
III.	Blanks	A	
IVa.	Surrogate recovery	SW	
IVb.	Matrix spike/Matrix spike duplicates	SW	
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	NP	D = 1+2
X.	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:

1	TSB-GJ-09-0'	11		21		31	
2	TSB-GJ-09-0'-FD	12		22		32	
3	TSB-GJ-08-0' 10X	13		23		33	
4		14	8161207	24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 19098A3
SDG #: w cover

VALIDATION FINDINDS WORKSHEET
Surrogate Recovery

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

METHOD: V **GC** __ **HPLC**

Are surrogates required by the method? Yes____ or No____.

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

Y N N/A Were surrogates spiked into all samples and blanks?

Y N N/A Did all surrogate recoveries (%R) meet the QC limits?

#	Sample ID	Detector/ Column	Surrogate Compound	%R (Limits)	Qualifications
	1, 3	not specified	H	DO (73-150)	no qual 10x DL
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
				( )	
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				( )	
				( )	
				( )	
				( )	
				( )	

	Surrogate Compound		Surrogate Compound		Surrogate Compound		Surrogate Compound		
A	Chlorobenzene (CBZ)	G	Octacosane	M	Benzo(e)Pyrene	S	1-Chloro-3-Nitrobenzene	Y	Tetrachloro-m- xylene
B	4-Bromofluorobenzene (BFB)	H	Ortho-Terphenyl	N	Terphenyl-D14	T	3,4-Dinitrotoluene		
C	a,a,a-Trifluorotoluene	I	Fluorobenzene (FBZ)	O	Decachlorobiphenyl (DCB)	U	Tripentyltin		
D	Bromochlorobenene	J	n-Triacontane	P	1-methylnaphthalene	V	Tri-n-propyltin		
E	1,4-Dichlorobutane	K	Hexacosane	Q	Dichlorophenyl Acetic Acid (DCAA)	W	Tributyl Phosphate		
F	1,4-Difluorobenzene (DFB)	L	Bromobenzene	R	4-Nitrophenol	X	Triphenyl Phosphate		

LDC #: 19098A8
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

Reviewer: B
2nd Reviewer: e

METHOD: ✓ GC ___ HPLC

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

(Y) N N/A Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG?

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

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

#	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	TSB-FR-02-02	DRO	116 (55-104)	111 (55-104)	( )	none	no qual
	-0'MS/D		( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
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			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 4, 2008

LDC Report Date: July 22, 2008

Matrix: Soil

Parameters: Polynuclear Aromatic Hydrocarbons

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-GJ-09-0'
TSB-GJ-09-0'-FD
TSB-GJ-08-0'

Introduction

This data review covers 3 soil samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA SW 846 Method 8310 for Polynuclear Aromatic Hydrocarbons.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section III.

Field duplicates are summarized in Section IX.

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.

A Indicates the finding is based upon technical validation criteria.

P Indicates the finding is related to a protocol/contractual deviation.

None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. Calibration

a. Initial Calibration

Initial calibration of compounds was performed as required by the method.

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

b. Calibration Verification

Calibration verification was performed at required frequencies.

The percent differences (%D) of calibration factors in continuing standard mixtures were within the 15.0% QC limits with the following exceptions:

Date	Detector	Compound	%D	Associated Samples	Flag	A or P
6/11/08	Not specified	Benzo(a)anthracene Benzo(k)fluoranthene	15.5 15.2	All samples in SDG F8F050256	J+ (all detects) J+ (all detects)	A

The percent differences (%D) of the second source calibration standard were less than or equal to 15.0% for all compounds with the following exceptions:

Date	Detector	Compound	%D	Associated Samples	Flag	A or P
6/4/08	Not specified	Benzo(k)fluoranthene	16.6	All samples in SDG F8F050256	J+ (all detects)	A

III. Blanks

Method blanks were reviewed for each matrix as applicable. No polynuclear aromatic hydrocarbon contaminants were found in the method blanks.

No field blanks were identified in this SDG.

IV. Accuracy and Precision Data

a. Surrogate Recovery

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

b. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were not within QC limits. Since there were no associated samples, no data were qualified.

c. Laboratory Control Samples

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

V. Target Compound Identification

Raw data were not reviewed for this SDG.

VI. Compound Quantitation and CRQLs

Raw data were not reviewed for this SDG.

VII. System Performance

Raw data were not reviewed for this SDG.

VIII. Overall Assessment of Data

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

IX. Field Duplicates

Samples TSB-GJ-09-0' and TSB-GJ-09-0'-FD were identified as field duplicates. No polynuclear aromatic hydrocarbons were detected in any of the samples.

BRC Tronox Parcel G
Polynuclear Aromatic Hydrocarbons - Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Flag	A or P	Reason
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Benzo(a)anthracene Benzo(k)fluoranthene	J+ (all detects) J+ (all detects)	A	Continuing calibration (%D)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	Benzo(k)fluoranthene	J+ (all detects)	A	Continuing calibration (ICV %D)

BRC Tronox Parcel G
Polynuclear Aromatic Hydrocarbons - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Polynuclear Aromatic Hydrocarbons - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: 19098A9
SDG #: F8F050256
Laboratory: Test America

VALIDATION COMPLETENESS WORKSHEET
Level III

Date: 7/20/08
Page: 1 of 1
Reviewer: F
2nd Reviewer: [illegible]

METHOD: GC Polynuclear Aromatic Hydrocarbons (EPA SW 846 Method 8310)

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: 6/4/08
IIa.	Initial calibration	A	
IIb.	Calibration verification/ICV	SW	ICV ≤ 15
III.	Blanks	A	
IVa.	Surrogate recovery	A	
IVb.	Matrix spike/Matrix spike duplicates	SW	TSB-PR-02-02-0 MS/D
IVc.	Laboratory control samples	A	LCS
V.	Target compound identification	N	
VI.	Compound Quantitation and CRQLs	N	
VII.	System Performance	N	
VIII.	Overall assessment of data	A	
IX.	Field duplicates	ND	D = 1 & 2
X.	Field blanks	N	

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

Validated Samples: SOIL

1	TSB-GJ-09-0'	11	F8F090000-209	21	8/6/209	31	
2	TSB-GJ-09-0'-FD	12		22		32	
3	TSB-GJ-08-0'	13		23		33	
4	~~F8F090000-208~~	14	8T6208	24		34	
5		15	~~8~~	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: ____GC ____HPLC

8310	8330	8151	8141	8141(Con't)	8021B
A. Acenaphthene	A. HMX	A. 2,4-D	A. Dichlorvos	V. Fensulfothion	V. Benzene
B. Acenaphthylene	B. RDX	B. 2,4-DB	B. Mevinphos	W. Bolstar	CC. Toluene
C. Anthracene	C. 1,3,5-Trinitrobenzene	C. 2,4,5-T	C. Demeton-O	X. EPN	EE. Ethyl Benzene
D. Benzo(a)anthracene	D. 1,3-Dinitrobenzene	D. 2,4,5-TP	D. Demeton-S	Y. Azinphos-methyl	SSS. O-Xylene
E. Benzo(a)pyrene	E. Tetryl	E. Dinoseb	E. Ethoprop	Z. Coumaphos	RRR. MP-Xylene
F. Benzo(b)fluoranthene	F. Nitrobenzene	F. Dichlorprop	F. Naled	AA. Parathion	GG. Total Xylene
G. Benzo(g,h,i)perylene	G. 2.4.6-Trinitrotoluene	G. Dicamba	G. Sulfotep	BB. Trichloronate	
H. Benzo(k)fluoranthene	H. 4-Amino-2,6-dinitrotoluene	H. Dalapon	H. Phorate	CC. Trichlorinate	
I. Chrysene	I. 2-Amino-4,6-dinitrotoluene	I. MCPP	I. Dimethoate	DD. Trifluralin	
J. Dibenz(a,h)anthracene	J. 2,4-Dinitrotolune	J. MCPA	J. Diazinon	EE. Def	
K. Fluoranthene	K. 2,6-Dinitrotoluene	K. Pentachlorophenol	K. Disulfoton	FF. Prowl	
L. Fluorene	L. 2-Nitrotoluene	L.. 2,4,5-TP (silvex)	L. Parathion-methyl	GG. Ethion	
M. Indeno(1,2,3-cd)pyrene	M. 3-Nitrotoluene	M. Silvex	M. Ronnel	HH. Tetrachlorvinphos	
N. Naphthalene	N. 4-Nitrotoluene		N. Malathion	II. Sulprofos	
O. Phenanthrene	O.		O. Chlorpyrifos		
P. Pyrene	P.		P. Fenthion		
Q.	Q		Q. Parathion-ethyl		
R.			R. Trichloronate		
S.			S. Merphos		
			T. Stirofos		
			U. Tokuthion		

Notes:_____

LDC #: 19098A9
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Continuing Calibration

Reviewer: [illegible]
2nd Reviewer: [illegible]

METHOD: ✓ GC ___ HPLC

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".
What type of continuing calibration calculation was performed? ___%D or ___RPD

(Y) N N/A Were continuing calibration standards analyzed at the required frequencies?
Y (N) N/A Did the continuing calibration standards meet the %D / RPD validation criteria of ≤15.0%?

Level IV Only

Y N (N/A) Were the retention times for all calibrated compounds within their respective acceptance windows?

#	Date	Standard ID	Detector/ Column	Compound	%D / RPD (Limit ≤ 15.0)	RT (limit)	Associated Samples	Qualifications
+	6/4/08	QICV768	not specified	H	16.6	( )	All + B/K	J+/Adet
						( )		
						( )		
						( )		
+	6/11/08	QCAL837	↓	D	15.5	( )	~~F8F09000-209~~	J+/Adet
+				H	15.2	( )	All + Blank	↓
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		
						( )		

LDC #: 19098A9
SDG #: see cover

VALIDATION FINDINGS WORKSHEET
Matrix Spike/Matrix Spike Duplicates

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

METHOD: ✓ GC ___ HPLC

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

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

#	MS/MSD ID	Compound	MS %R (Limits)	MSD %R (Limits)	RPD (Limits)	Associated Samples	Qualifications
	TSB-FR-02-02 +	several	compounds	failed %R	+ % RPD)	none	no QUAL
	O'MS/D		( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
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			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		
			( )	( )	( )		

Laboratory Data Consultants, Inc.
Data Validation Report

Project/Site Name: BRC Tronox Parcel G

Collection Date: June 4, 2008

LDC Report Date: July 23, 2008

Matrix: Soil

Parameters: Dioxins/Dibenzofurans

Validation Level: EPA Level III

Laboratory: TestAmerica, Inc.

Sample Delivery Group (SDG): F8F050256

Sample Identification

TSB-GJ-09-0'
TSB-GJ-09-0'-FD
TSB-GJ-08-0'

Introduction

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

This review follows USEPA Contract Laboratory Program National Functional Guidelines for Polychlorinated Dioxins/Dibenzofurans Data Review (September 2005) as there are no current guidelines for the method stated above.

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

Blank results are summarized in Section V.

Field duplicates are summarized in Section XIV.

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.

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.

A Indicates the finding is based upon technical validation criteria.

P Indicates the finding is related to a protocol/contractual deviation.

None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

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

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at the required daily frequency.

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

III. Initial Calibration

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

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

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

IV. Routine Calibration (Continuing)

Routine calibration was performed at the required frequencies.

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

Date	Compound	%D	Associated Samples	Affected Compound	Flag	A or P
7/3/08	^{13}C-2,3,7,8-TCDF	57.3	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	2,3,7,8-TCDF	J (all detects) UJ (all non-detects)	P

The percent differences (%D) of the second source calibration standard were less than or equal to 25.0% for all 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.

No field blanks were identified 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. 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
TSB-GJ-09-0'	^{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-1,2,3,7,8-PeCDF ^{13}C-1,2,3,4,7,8-HxCDF ^{13}C-1,2,3,4,6,7,8-HpCDF	33 (40-135) 35 (40-135) 26 (40-135) 16 (40-135) 36 (40-135) 35 (40-135) 25 (40-135)	1,2,3,7,8-PeCDD 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF	J (all detects) UJ (all non-detects)	P

X. Target Compound Identifications

Raw data were not reviewed for this SDG.

XI. Compound Quantitation and CRQLs

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 the report if data has been qualified.

XIV. Field Duplicates

Samples TSB-GJ-09-0' and TSB-GJ-09-0'-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)	Flag	A or P
	TSB-GJ-09-0'	TSB-GJ-09-0'-FD				
OCDD	31	10	102 (≤50)	-	J (all detects)	A
2,3,7,8-TCDF	4.0	2.6	42 (≤50)	-	-	-
1,2,3,7,8-PeCDF	2.9	1.8U	-	1.1 (≤1.8)	-	-
2,3,4,7,8-PeCDF	2.5	1.2U	-	1.3 (≤1.2)	J (all detects) UJ (all non-detects)	A
1,2,3,4,7,8-HxCDF	5.0	2.5U	-	2.5 (≤2.5)	-	-
1,2,3,6,7,8-HxCDF	2.7	1.4U	-	1.3 (≤1.4)	-	-
1,2,3,4,6,7,8-HpCDF	7.7	2.5U	-	5.2 (≤2.5)	J (all detects) UJ (all non-detects)	A
1,2,3,4,7,8,9-HpCDF	2.8	1.2U	-	1.6 (≤1.2)	J (all detects) UJ (all non-detects)	A
OCDF	19	4.1U	-	14.9 (≤4.1)	J (all detects) UJ (all non-detects)	A

BRC Tronox Parcel G
Dioxins/Dibenzofurans - Data Qualification Summary - SDG F8F050256

SDG	Sample	Compound	Flag	A or P	Reason
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD TSB-GJ-08-0'	2,3,7,8-TCDF	J (all detects) UJ (all non-detects)	P	Routine calibration (%D)
F8F050256	TSB-GJ-09-0'	1,2,3,7,8-PeCDD 1,2,3,4,7,8-HxCDD 1,2,3,6,7,8-HxCDD 1,2,3,7,8,9-HxCDD 1,2,3,4,6,7,8-HpCDD OCDD 1,2,3,7,8-PeCDF 2,3,4,7,8-PeCDF 1,2,3,4,7,8-HxCDF 1,2,3,6,7,8-HxCDF 2,3,4,6,7,8-HxCDF 1,2,3,7,8,9-HxCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF	J (all detects) UJ (all non-detects)	P	Internal standards (%R)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD	OCDD	J (all detects)	A	Field duplicates (RPD)
F8F050256	TSB-GJ-09-0' TSB-GJ-09-0'-FD	2,3,4,7,8-PeCDF 1,2,3,4,6,7,8-HpCDF 1,2,3,4,7,8,9-HpCDF OCDF	J (all detects) UJ (all non-detects)	A	Field duplicates (Difference)

BRC Tronox Parcel G
Dioxins/Dibenzofurans - Laboratory Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

BRC Tronox Parcel G
Dioxins/Dibenzofurans - Field Blank Data Qualification Summary - SDG F8F050256

No Sample Data Qualified in this SDG

LDC #: 19098A21 **VALIDATION COMPLETENESS WORKSHEET** Date: 7/19/08
SDG #: F8F050256 Level III Page: 1 of 1
Laboratory: Test America Reviewer: [illegible]
2nd Reviewer: [illegible]

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: 6/4/08
II.	GC/MS Instrument performance check	A	
III.	Initial calibration	A	
IV.	Routine calibration ~~ICV~~ CCV	SW/A	
V.	Blanks	A	
VI.	Matrix spike/Matrix spike duplicates	N	client specified
VII.	Laboratory control samples	A	LCS
VIII.	Regional quality assurance and quality control	N	
IX.	Internal standards	SW	
X.	Target compound identifications	N	
XI.	Compound quantitation and CRQLs	N	
XII.	System performance	N	
XIII.	Overall assessment of data	A	
XIV.	Field duplicates	SW	D = 1+2
XV.	Field blanks	N	

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

Validated Samples: soil

1	TSB-GJ-09-0'	11	816542C	21		31	
2	TSB-GJ-09-0'-FD	12		22		32	
3	TSB-GJ-08-0'	13		23		33	
4		14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

Notes: _____

LDC #: 19098A21
SDG #: F8F050256

VALIDATION FINDINGS WORKSHEET
Routine Calibration

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

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 Was a routine calibration was performed at the beginning and end of each 12 hour period?
Y (N) N/A Were all percent differences (%D) of RRFs ≤ 20% for unlabeled compounds and ≤ 30% for labeled?
(Y) N N/A Did all routine calibration standards meet the Ion Abundance Ratio criteria?

#	Date	Standard ID	Compound	Finding %D (Limit: ≤30.0%)	Finding Ion Abundance Ratio	Associated Samples	Qualifications
	7/3/08	02JL08B1D2520 (-ending)	^{13}C-2,3,7,8-TCDF	57.3		All, NB	J/UJ/P (H) (# from DB225)

PCDDs	Selected Ions (m/z)	Ion Abundance Ratio
Tetra-	M/M+2	0.65-0.89
Penta-	M+2/M+4	1.32-1.78
Hexa-	M+2/M+4	1.05-1.43
Hexa-^{13}C-HxCDF (IS) only	M/M+2	0.43-0.59
Hepta-^{13}C-HpCDF (IS) only	M/M+2	0.37-0.51
Hepta-	M+2/M+4	0.88-1.20
Octa-	M+2/M+4	0.76-1.02

PCDFs	Selected Ions (m/z)	Ion Abundance Ratio
Tetra-	M/M+2	0.65-0.89
Penta-	M+2/M+4	1.32-1.78
Hexa-	M+2/M+4	1.05-1.43
Hexa-^{13}C-HxCDF (IS) only	M/M+2	0.43-0.59
Hepta-^{13}C-HpCDF (IS) only	M/M+2	0.37-0.51
Hepta-	M+2/M+4	0.88-1.20
Octa-	M+2/M+4	0.76-1.02

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 #: 19098A2 (B)
SDG #: F8F050256

VALIDATION FINDINGS WORKSHEET
Internal Standards

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

METHOD: HRGC/HRMS Dioxins/Dibenzofurans (EPA SW 846 Method 8290)
Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

Y (N) N/A Are all internal standard recoveries were within the 40-135% criteria?
Y N (N/A) Was the S/N ratio all internal standard peaks ≥ 10?

#	Date	Lab ID/Reference	Internal Standard	% Recovery (Limit: 40-135%)	Qualifications
		1	~~B~~	( )	
			D	33 (40-135)	J/UJ/P (B-G, 1-Q)
			F	35 ( )	
			H	26 ( )	
			I	16 ( )	
			~~A~~	( )	
			C	36 ( )	
			E	35 ( )	
			G	25 ( )	
				( )	
				( )	
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	Internal Standards	Check Standard Used		Internal Standards	Check Standard Used
A.	^{13}C-2,3,7,8-TCDF		I.	^{13}C-OCDD	
B.	^{13}C-2,3,7,8-TCDD		K.	^{13}C-1,2,3,4-TCDD	
C.	^{13}C-1,2,3,7,8-PeCDF		L.	^{13}C-1,2,3,7,8,9-HxCDD	
D.	^{13}C-1,2,3,7,8-PeCDD		M		
E.	^{13}C-1,2,3,4,7,8-HxCDF		N.		
F.	^{13}C-1,2,3,6,7,8-HxCDD		O.		
G.	^{13}C-1,2,3,4,6,7,8-HpCDF		P.		
H.	^{13}C-1,2,3,4,6,7,8-HpCDD				

LDC #: 19098A21
SDG #: F8F050251

VALIDATION FINDINGS WORKSHEET
Field Duplicates

Page: 1 of 1
Reviewer: MG
2nd reviewer:

METHOD: GC/MS BNA (EPA SW 846 Method 8270)

Y N N/A Were field duplicate pairs identified in this SDG?
Y N N/A Were target compounds identified in the field duplicate pairs?

Compound	Concentration (µg/L)		RPD ≤ 50
	1	2	
G	31	10	102 (≤50) J det /A
H	4.0	2.6	42 ↓ -
I	2.9	1.8U	1.1 (≤1.8) -
J	2.5	1.2U	1.3 (≤1.2) J/UJ/A
K	5.0	2.5U	2.5 (≤2.5) -

Compound	Concentration ( )		RPD
L	2.7	1.4U	1.3 (≤1.4) -
O	7.7	2.5U	5.2 (≤2.5) J/UJ/A
P	2.8	1.2U	1.6 (≤1.2) ↓
Q	19	4.1U	14.9 (≤4.1) ↓

Compound	Concentration ( )		RPD

Compound	Concentration ( )		RPD