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Date: July 13, 2016

To: Rob Ede

Hahn and Associates Inc.

From: Jeanne Peterson

Sr. Data Validator, AQA

Subject: Data Validation

Siltronic RI - Doane Creek

Fremont Analytical Work Order # 1604081 (A6D0056)

SUMMARY

Level III data validation was performed on the data for four soil samples prepared and analyzed with approved procedures using the Method for the Determination of Volatile Petroleum Hydrocarbons (VPH) Fractions or the Method for the Determination of Extractable Petroleum Hydrocarbons (EPH) Fractions. The samples were submitted to Fremont Analytical (Fremont) for analysis. Data were reported for all requested analytes.

The analytical data were evaluated in accordance with the *USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review* (October 1999) and the *USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review* (February 1994) (NFG).

In general, most of the data are valid as reported. No sample data were rejected. Other qualifiers were applied to the data as specified in the Data Qualifiers section below.

See attached data validation spreadsheets for supporting documentation on the data review and validation.





SAMPLES

The samples included in this validation are listed below.

Sample ID	Fremont Laboratory ID	APEX Laboratory ID	Analysis
5237-160401-DC-EMB046G	1604081-001	A6D0056-05	VPH
5237-160401-DC-EMB046	1604081-002	A6D0056-06	ЕРН
5237-160401-NPD-EMB002G	1604081-003	A6D0056-07	VPH
5237-160401-NPD-EMB002	1604081-004	A6D0056-08	ЕРН

DATA QUALIFIERS (see following sections for detailed explanations)

Sample ID	Method	Analyte	Qualifier	Reason for Qualification
5237-160401-DC-EMB046G	VPH	Aromatic hydrocarbon (C12-C13)	UJ	Poor replicate precision
		Aliphatic hydrocarbon (C16-C21)	J	Low surrogate recovery
5237-160401-DC-EMB046	ЕРН	Aliphatic hydrocarbon (C8-C10) Aliphatic hydrocarbon (C10-C12) Aliphatic hydrocarbon (C12-C16) Aliphatic hydrocarbon (C21-C34)	UJ	Low surrogate recovery
		Aliphatic hydrocarbon (C16-C21)	J	Low surrogate recovery and poor replicate precision
5237-160401-NPD-EMB002	ЕРН	Aliphatic hydrocarbon (C8-C10) Aliphatic hydrocarbon (C10-C12) Aliphatic hydrocarbon (C12-C16) Aliphatic hydrocarbon (C21-C34)	UJ	Low surrogate recovery

DISCUSSION

Sample Shipping/Receiving

All COC, analysis request, and sample receipt documentation was complete and correct.





Holding Times and Preservation

The samples were properly preserved and analyzed within the prescribed holding times.

Calibration

All initial and continuing calibration acceptance criteria were met with the following exceptions.

Method VPH

The initial continuing calibration verification (ICV) and/or continuing calibration verification (CCV) percent differences (%Ds) were >20% with positive bias for aliphatic hydrocarbon (C5-C6), aliphatic hydrocarbon (C10-C12), aromatic hydrocarbon (C8-C10), aromatic hydrocarbon (C10-C12), and aromatic hydrocarbon (C12-C13). The associated sample results were non-detects and not affected by the high bias and, therefore, were not qualified based on professional judgment.

Blanks

No target analytes were detected in the method blanks.

Surrogates

All surrogate recoveries were within laboratory QC acceptance criteria with the following exceptions.

Method EPH

The 1-chlorooctadecane recoveries were < the lower acceptance limit but ≥10% for samples 5237-160401-DC-EMB046 and 5237-160401-NPD-EMB002. The associated sample results that were detects were **qualified J**, and the associated sample results that were non-detects were **qualified UJ**.

Laboratory Control Sample (LCS)

The LCS analysis met all laboratory acceptance criteria with the following exception.

Method VPH

The LCS recovery was > the upper acceptance limit for aromatic hydrocarbon (C10-C12). The associated sample results were non-detects and not affected by the high bias and, therefore, were not qualified based on professional judgment.





Matrix Spike (MS)/Matrix Spike Duplicate (MSD)

The MS/MSD analysis met all QC acceptance criteria with the following exceptions.

Method VPH

The MS/MSD recoveries were > the upper acceptance limit for aromatic hydrocarbon (C10-C12). The associated sample results were non-detects and not affected by the high bias and, therefore, were not qualified based on professional judgment.

The MSD recovery was > the upper acceptance limit for aromatic hydrocarbon (C12-C13). The associated sample results were non-detects and not affected by the high bias and, therefore, were not qualified based on professional judgment.

Laboratory Duplicate

The laboratory duplicate analysis met all QC acceptance criteria with the following exception.

Method VPH

The relative percent difference (RPD) between the MS and MSD results was > the acceptance limit for aromatic hydrocarbon (C12-C13). The aromatic hydrocarbon (C12-C13) result for parent sample 5237-160401-DC-EMB046G was a non-detect and, therefore, was **qualified UJ**. Because another duplicate sample was performed on a sample from another work order that was within acceptance criteria, no other sample data were qualified based on professional judgment.

Method EPH

The RPD between the sample and duplicate results was > the acceptance limit for aliphatic hydrocarbon (C16-C21). The aliphatic hydrocarbon (C16-C21) result for parent sample 5237-160401-NPD-EMB002 was a detect and, therefore, was **qualified J**. Because all other QC criteria were met for this analyte, no other sample data were qualified based on professional judgment.

Field Duplicate

A field duplicate was not collected with the samples in this work order.

Reporting Limits

All reporting limits were properly reported. The samples were not diluted.





Other QC

No other specific issues that affect data quality were identified.

Hahn Data Validation Summary Worksheet

SDG#: 1604080_A6D0013		Laboratory: Free	mont	Valid	lator: Jeanne	Peterson		Validation I	Date: 06/13/2010	6
Site: Siltronic - Doane Creek		COC#: NA		•				Validation I	level: II	⊠ III
Matrix: Soil		# of Samples: 4		Tracl	king docs pres	sent: See sa	ample receipt and	log-in docume	ntation	
COCs present: Yes		COCs signed: Y	es	COC	s dated: Yes			Sample Cont	ainer Integrity:	OK
Analyses: ☐ VOCs ☐ SVOCs ☐ I ☐ Other: VPH, EPH	PAHs [] GRO □ DRO	O Pests [] PCB	s 🗌 Metals	s 🗌 Go	en Chem 🔲 C	yanide		
			Requested	Analys	ses Not Repo	orted				
Client Sample ID	La	b Sample ID	Analysis				Cor	nments		
None										
			Hold Time	/Droso	rvation Out	lions				
Client Sample ID	Lab	Sample ID	Analysis	Pres	Col	llection	Preparation	Analysis	Analysis	Analysis
None						Date	Date	Date	<3X HT	≥3X HT
Trone										
Commental Comments called 12	1/21				I		1			I
Comments: Samples collected 3	0/31.									
Cooler temps OK.										

Hahn Level III VPH Worksheet

SDG: 1604080 Matrix: Soil Lab Sample IDs: 1604080-001, -003

Method/Batch #: VPH/13429

Lab-established control limits may be used in place of these:

		Calibratio	n		-		- 60-	LCSD/	3.50	2.500	3.50/5	
Analyte (outliers)	RSD/r ≤20%/ ≥0.99	ICV %D ±20%	CCV %D ±20%	Method Blank	5X Blank	LCS %R 70-130%	LCSD %R 70-130%	LCSD RPD ≤25%	MS %R 70-130%	MSD % 70-130%	MS/D RPD ≤25%	
Aliphatic hydrocarbon (C5-C6)	✓	149	✓	✓	NA	✓	NA	NA	✓	✓	✓	
Aliphatic hydrocarbon (C10-C12)	✓	122	✓	✓	NA	✓	NA	NA	✓	✓	✓	
Aromatic hydrocarbon (C8-C10)	✓	123	✓	✓	NA	✓	NA	NA	✓	✓	✓	
Aromatic hydrocarbon (C10-C12)	✓	127	171/127	✓	NA	149	NA	NA	204	226	✓	
Aromatic hydrocarbon (C12-C13)	✓	✓	150	✓	NA	✓	NA	NA	✓	153	30	

Surrogate Outliers (60-140% or laboratory-established control limits)

Sample ID	Surrogate	%R	Sample ID	Surrogate	%R	Sample ID	Surrogate	%R
None								

Comments: HTs out. MB, LCS, 1604081-001AMS/MSD, 1604078-003ADUP

NOTE: ICV had detects, but run log shows cleanout runs in after the CCV and LCS prior to the method blank and samples. The method blank had no detects; therefore, the ICV detects were not applicable.

Hahn Level III EPH Worksheet

SDG: 1604080	Matrix: Soil	Lab Sample IDs: 1604080-002, -004
Method/Batch #: EPH/	13403	

			Calibratio	n									
Analyte (outliers)		RSD/r ≤20%/ ≥0.99	ICV/CCV %D ±20%	Daily RT Windows	Method Blank	5X Blank	LCS %R	MS %R	MSD %R	MS/D RPD	Lab Dup RPD		
Aliphatic Hydrocarbon (C	C16-C21)	✓	✓	NA	✓	NA	✓	NA	NA	NA	47.4		
													<u> </u>
											_		
			Surrogat	te Outliers (60-140% or i	laboratory-es	tablished co	ontrol limi	its)				
Sample ID	Surrog	ate	Surrogat	te Outliers (laboratory-es Surrogate	tablished co	ontrol limi	sts) Sample	ID	Sur	rogate	%R
-	Surrog	ate				-		ontrol limi		ID	Sur	rogate	%R
1604081-004ADUP		ate	%R			-		ontrol limi		ID	Sur	rogate	%R
1604081-004ADUP	1-ClOD	ate	%R 53.6			-		ontrol limi		ID	Sur	rogate	%R
1604081-004ADUP -002	1-ClOD 1-ClOD	ate	%R 53.6 44.8			-		ontrol limi		ID	Sur	rogate	%R
1604081-004ADUP -002	1-ClOD 1-ClOD o-Terph	ate	%R 53.6 44.8 44.8			-		ontrol limi		ID	Sur	rogate	%R
604081-004ADUP 002	1-ClOD 1-ClOD o-Terph	ate	%R 53.6 44.8 44.8	Sample	e ID	Surrogate	%R	ontrol limi		ID	Sur	rogate	%R
1604081-004ADUP -002	1-ClOD 1-ClOD o-Terph	ate	%R 53.6 44.8 44.8	Sample	e ID	-	%R	ontrol limi		ID	Sur	rogate	%R
Sample ID 1604081-004ADUP -002 -004 Sample ID	1-ClOD 1-ClOD o-Terph	ate	%R 53.6 44.8 44.8	Sample	e ID	Surrogate	%R			ID Area	Sur	rogate	%R

Comments: HT OK. MB, LCS, 1604081-004ADUP.

NOTE: ICV had detects, but run log shows ICV was run much earlier in the day than the samples, and the method blank extracted with and run right before the samples had no detects; therefore, the ICV detects were not applied to the sample results.