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Date:	September 19, 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 # 1604080 (A6D0013)

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
5237-160331-NDP-SED002G	1604080-001	A6D0013-03	VPH
5237-160331-NDP-SED002	1604080-002	A6D0013-04	EPH
5237-160331-NDP-SED004G	1604080-003	A6D0013-09	VPH
5237-160331-NDP-SED004	1604080-004	A6D0013-10	EPH

DATA QUALIFIERS (see following sections for detailed explanations)

Sample ID	Method	Analyte	Qualifier	Reason for Qualification
5237-160331-NDP-SED002	EPH	Aliphatic hydrocarbon (C8-C10) Aliphatic hydrocarbon (C10-C12) Aliphatic hydrocarbon (C12-C16) Aliphatic hydrocarbon (C16-C21) Aliphatic hydrocarbon (C21-C34) Aromatic hydrocarbon (C8-C10) Aromatic hydrocarbon (C10-C12) Aromatic hydrocarbon (C12-C16) Aromatic hydrocarbon (C16-C21)	UJ	Low surrogate recovery
		Aromatic hydrocarbon (C21-C34)	J	Low surrogate recovery
5237-160331-NDP-SED004	EPH	Aliphatic hydrocarbon (C8-C10) Aliphatic hydrocarbon (C10-C12) Aliphatic hydrocarbon (C12-C16) Aliphatic hydrocarbon (C16-C21) Aliphatic hydrocarbon (C21-C34)	J	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.

<u>Blanks</u>

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 and o-terphenyl recoveries were < the lower acceptance limit but $\geq 10\%$ for sample 5237-160331-NDP-SED002. The associated sample results that were detects were **qualified J**, and the associated sample results that were non-detects were **qualified UJ**.

The 1-chlorooctadecane recovery was < the lower acceptance limit but $\geq 10\%$ for sample 5237-160331-NDP-SED004. The associated sample results were detects and, therefore, were **qualified J**.

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). Because the parent sample was from another work order and the duplicate sample performed on a sample from another work order was within acceptance criteria, no 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). Because the parent sample was from another work order and all other QC criteria were met, no 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: Fremont	Validator: Jeanne Peterson	Validation Date: 06/13/2016		
Site: Siltronic - Doane Creek	COC#: NA		Validation Level: 🗌 II 🛛 🖾 III		
Matrix: Soil	# of Samples: 4	Tracking docs present: See sample receipt and	log-in documentation		
COCs present: Yes	COCs signed: Yes	COCs dated: Yes	Sample Container Integrity: OK		
Analyses: VOCs SVOCs PAHs Other: VPH, EPH	GRO DRO Pests	PCBs Metals Gen Chem C	vanide		

		Requested Analys	ses Not Reported
Client Sample ID	Lab Sample ID	Analysis	Comments
None			

	Hold Time/Preservation Outliers											
Client Sample ID	Lab Sample ID	Analysis	Pres.	Collection Date	Preparation Date	Analysis Date	Analysis <3X HT	Analysis ≥3X HT				
None												

Comments: Samples collected 3/31.

Cooler temps OK.

Hahn Level III VPH Worksheet

SDG: 1604080	Matrix: Soil	Lab Sample IDs: 1604080-001, -003
Mathad/Datah #: VDU	/12/20	

Method/Batch #: VPH/13429

		Lab	-established co	ontrol limits may	be used in pl	ace of these:	1	r		1	1	r	1
Analyte (outliers)		RSD/r ≤20%/ ≥0.99	Calibration	on CCV %D ±20%	Method Blank	5X Blank	LCS %R 70-130%	LCSD %R 70-130%	LCSD/ LCSD RPD ≤25%	MS %R 70-130%	MSD % 70-130%	MS/D RPD ≤25%	
Aliphatic hydrocarbon (C5	-C6)	✓	149	✓	✓	NA	✓	NA	NA	✓	✓	~	
Aliphatic hydrocarbon (C1	0-C12)	✓	122	✓	✓	NA	✓	NA	NA	~	~	~	
Aromatic hydrocarbon (C8	-C10)	\checkmark	123	✓	✓	NA	✓	NA	NA	~	~	~	
Aromatic hydrocarbon (C1	0-C12)	✓	127	171/127	✓	NA	149	NA	NA	204	226	~	
Aromatic hydrocarbon (C1	2-C13)	~	✓	150	✓	NA	✓	NA	NA	✓	153	30	
	-		Surroga	te Outliers (t	50-140% or l	laboratory-es	stablished c	control limit	s)				
Sample ID Surrogate %R Sample				ID	Surrogate	%R		Sample I	D	Surrog	ate	%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	

		L	ab-established co	•	be used in pl	lace of these:	70-130%	70-	-130%	<i>≤25%</i>	%		
(outliers) $\leq 20\%$		RSD/r ≤20%/ ≥0.99	,	on Daily RT Windows	Method Blank	5X Blank	LCS %R	MS %R	MSD %R	MS/D RPD	Lab Dup RPD		
Aliphatic Hydrocarbon (C16-C21)	\checkmark	~	NA	\checkmark	NA	\checkmark	NA	NA	NA	47.4		
											<u> </u>		+-
			Surroga	te Outliers ((50-140% or	laboratory-es	tablished c	ontrol limi	ts)				
Sample ID	Surro	ogate			ID	Surrogate	%R		Sample ID		Surrogate		%R
1604081-004ADUP	1-ClO	D	53.6										
-002	1-ClO	D	44.8										
	o-Terp	h	44.8										
-004	1-ClO	D	63.7										
				10.0	(1. (5.00	(· · · 1000 ((CCU)						
Sample ID	Area	RT	Area	IS Ou RT	Area	$\frac{6 \text{ to } +100\% \text{ c}}{\text{RT}}$	of CCV) Area	Б	RT	Area	RT	Area	RT
	Area	K1	Агеа		Area	KI	Area	F	N1	Alta	N1	Arta	
NA													

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.