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Date:	September 18, 2019
To:	Rob Ede Hahn and Associates Inc.
From:	Jeanne Peterson Project Manager, AQA
Subject:	Data Validation Gasco Mult 802 Decommissioning Apex Laboratories, LLC Work Order A9F0684

SUMMARY

Level II (i.e., EPA Stage 2A) data validation was performed on the data for one oil sample prepared and analyzed using approved procedures for methods SW846 8260C (VOCs), SW846 8270D (SVOCs), NWTPH-Gx (gasoline range organics [GRO]), NWTPH-Dx (diesel and oil), and SW846 6020A (metals by ICPMS). *Data were reported for all requested analytes with the exception of total cyanide. There were no total cyanide results in the data package*.

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, collectively), and the applicable methods.

In general, the data are valid as reported. No 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 sample included in this validation is listed below.

Sample ID	APEX Sample ID	Analysis	Matrix
2708-190619-OIL	A9F0684-01	VOCs, SVOCs, GRO, DRO, Total Metals	Oil

DATA QUALIFIERS (see following sections for detailed explanations)

Sample ID	Method	Analyte	Qualifier	Qualifier Code	Reason for Qualification
2708-190619-OIL	8260C	Bromomethane	UJ	10	Low laboratory control sample recovery

DISCUSSION

Sample Shipping/Receiving

All COC, analysis request, and sample receipt documentation was complete and correct with the following exception.

The sample receipt section of the COCs was not completed; the information was documented on the Cooler Receipt Form.

Extra analyses were requested by email dated 07/25/2019.

Holding Times and Preservation

The sample was properly preserved and analyzed within the prescribed holding times with the following exceptions.

Methods 8260C and NWTPH-Gx

The pH of the sample at the time of analysis was not included in the Level II data package. There were no preservation problems noted by the laboratory; therefore, it was assumed that the sample was properly preserved and no data were qualified.



<u>Blanks</u>

Methods 8260C, 8270D, NWTPH-Gx, NWTPH-Dx, EPA 335.4, OIA/D6888, and ASTM D4282

No target analytes were detected in the method blank. Field blanks were not collected with the sample in this work order.

Method 6020A

Manganese was detected in the method blank. The associated sample result was a detect >10X the method blank value and, therefore, was not qualified.

Surrogates

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

Methods 8270D and NWTPH-Dx

The surrogates were diluted out of samples 2708-190619-OIL and 2708-190619-OIL DUP. No sample results were qualified.

Laboratory Control Sample (LCS)/Laboratory Control Sample Duplicate (LCSD)

The LCS/LCSD analyses met laboratory QC acceptance criteria with the following exceptions.

Method 8260C

The LCS recoveries associated with batch 9061492 were > the upper acceptance limit for carbon disulfide; carbon tetrachloride; 1,1-dichloroethene; 2,2-dichloropropane; methylene chloride; and 1,1,1,2-tetrachloroethane. The associated sample results were non-detects and not affected by the high bias and, therefore, were not qualified based on professional judgment.

Method 8270D

The LCS recovery was > the upper acceptance limit for 3,3'-dichlorobenzidine. The associated sample result was a non-detect and not affected by the high bias and, therefore, was not qualified based on professional judgment.

Matrix Spike/Matrix Spike Duplicate (MS/MSD)

The MS/MSD analyses met laboratory QC acceptance criteria.



Method 8260C

It should be noted that the MS analyses were performed on non-project samples.

Methods 8270D, NWTPH-Gx, and NWTPH-Dx

An MS analysis was not performed with the sample in this work order; therefore, matrix-specific accuracy data were not available.

Laboratory Duplicate

The laboratory duplicate analyses (LCS/LCSD, MS/MSD, and/or sample/duplicate) were within laboratory QC acceptance criteria.

Methods 8260C and NWTPH-Gx

It should be noted that the laboratory duplicate analyses were performed on non-project samples.

Field Duplicate

A field duplicate was not collected with the sample in this data package.

Reporting Limits

All reporting limits (RLs) were properly reported. Sample 2708-190619-OIL was diluted 200000X for naphthalene and 10000X for all remaining VOC target analytes and GRO; 1000X for SVOCs; 100X for DRO, and 5X for metals. Reporting limits were adjusted accordingly.

Other QC

Method NWTPH-Dx

The laboratory noted that no fuel pattern was detected for sample 2708-190619-OIL. The diesel result represents carbon range C12 to C24. Because this could not be verified with a Level II data package, the sample results were not qualified by the validator; however, the end user of the results should be aware that the results were considered to be estimated.

No other specific issues that affect data quality were identified.

Hahn Data Validation Summary Worksheet

SDG#: A9F0684	Laboratory: Apex	Validator: Jeanne Peterson	Validation Date: 08/28/2019							
Site: Mult 802 Decommissioning	COC#: 1		Validation Level: 🛛 II 🗌 III							
Matrix: Oil	# of Samples: 1	Tracking docs present: See sample receip	ot and log-in documentation							
COCs present: Yes	COCs signed: Yes	COCs dated: Yes	Sample Container Integrity: OK							
Analyses: \Box VOCs \Box VOCs \Box PAHs \Box DRO \Box Pests \Box PCBs \Box Metals \Box Other: VPH/EPH										

	Requested Analyses Not Reported													
Client Sample ID	Lab Sample ID	Analysis	Comments											
2708-190619-OIL	A9F0684-01	Total cyanide	Analysis requested by email dated 07/25/2019; no data in data package											

	Hold Time/Preservation Outliers													
Client Sample ID	Lab Sample ID	Analysis	Pres.	Collection Date	Preparation Date	Analysis Date	Analysis <2X HT	Analysis ≥2X HT						
None														

Comments: Samples collected 06/20/2019

Temp and containers not completed on COC; documented on Cooler Receipt Form.

Extra analyses were requested by email dated 07/25/2019.

Hahn Level III GCMS Worksheet

SDG: A9F0684	Method: 82	260C	Matrix:	Oil	Lab Sample ID: A9F0684-01										
Seq/Batch #s:/906149	92, 9070494		1		I										
Tuning: 🗌 Pass 🗌 Fa	uil	TICs	Required?	Yes	🛛 No			(lab	limits)		(lab lim	its)			
			Calil	oration											
Analyte (outliers)		RF ≥0.05	RSD/r² ≤30% ≥0.990	ICV ¹ %D ±25%	CCV %D ±25%	Method Blank	5X (10X) Method Blank	LCS %R	MS %R	MSD %R	MS/ MSD RPD	LAB DUP RPD	ТВ		
9061492															
CS2						✓	NA	127	 ✓ 	NA	NA	✓	NA		
CCl4						✓	NA	126	✓	NA	NA	✓	NA		
1,1-DCE						~	NA	128	✓	NA	NA	✓	NA		
2,2-Dichloropropane						✓	NA NA	127	✓	NA		✓	NA		
						V	NA NA	121	v	NA NA	NA NA	 ✓ ✓ 	NA NA		
1,1,1,2-PCA 0070404 (nonhtholono on	(hy)					•	INA	121	•	INA	INA	•	INA		
None	lly)														
		•		Surroga	te Recov	verv Outliers	(method/lab	limits)		•		•			
Sample ID	DBFM	1,	4-DCB	Tol-d8	4	-BFB	Sample	ID	DBF	M	1,4-DCB	Т	ol-d8	4-BFB	
None															
				IS	Outliers	s (-50% to +1	00% of CCV	7)							
Sample ID	Area	RT	Area	RT	Ar	:ea F	RT	Area	RT	A	rea	RT	Area	RT	
NA															
Comments: HTs OK for r	inpreserved sa	mples pF	Lunknown												
9061492: MB, LCS, -01,	unknown Dup	, unknown	MS												

9070494: MB, LCS, -01 RE1, unknown Dup1, unknown Dup2, unknown MS

Sample -01 diluted 200000X for naphthalene and 10000X for all remaining target analytes

Hahn Level III GCMS Worksheet

SDG: A9F0684	Method:	Method: 8270D Matrix: Oil					ab Sample	IDs:	A9F0	684-01							
Seq/Batch #s:/906150)8					·											
Tuning: 🗌 Pass 🗌 Fa	uil]	ΓICs Req	juired?	Yes 🛛	No			(lab li	mits)		(le	ab limits)				
			Cal	libration			5X				LCC						
Analyte (outliers)		RF ≥0.05	$\begin{array}{ c c } \hline \textbf{RSD/r}^2 \\ \leq 30\% \end{array}$	2 ICV %D ±25%	CCV %D ±25%	Method Blank	(10X) Method Blank	L %	CS 6R	LCSD %R	D RPD	MS %R	MSD %R	MS/D RPD	Lab Dup RPD		
3,3'-Dichlorobenzidine						~	NA	2	85	NA	NA	NA	NA	NA	✓		
														<u> </u>			
	1				Surroga	te Recov	ery Outlie	rs (lał	b limit.	s)							
Sample ID	Nitrob	enzene-d	5	2-Fluoro	biphenyl	I	Phenol-d6		p-	Ferphenyl-	-d14	2-Fl	uorophen	ol	2,4,6-Tr	ibromop	henol
-01 1000X		DO		D	0		DO			DO			DO			DO	
Dup 1000X DO DO							DO			DO			DO			DO	
					IS Ou	tliers (-5	0% to +100)% of	CCV)								-
Sample ID	Acen-	d10	RT	Chry-d12	RT	Per	-d12	RT		Dibenz-d	14	RT	Area	RT		Area	RT
NA																	
F																	

Comments: HTs OK. DO = Diluted out

MB, LCS, -01, A9F0684-01 Dup

Sample -01 diluted 1000X for all target compounds

Hahn Level III NWTPH-GX Worksheet

SDG: A9F0684	M	fatrix: (Oil	Lab	Sample II	Ds: A9F068	4-01								
Seq./Batch #s:/90	61492	,		L. L.											
Tuning: 🛛 Pass	🗌 Fa	il								(lab limits	t) (lab lin	ıits)			
				Cali	bration									L	b
Analyte (outliers)))	r ² ≥0.990 ±20%		10	ICV/CCV %DRT Windows		Met Bla	hod nk	5X Blank	LCS %R	MS %R	MSD %R	MS RP	S/D La PD Du RP	b p1 D
GRO							~	<i>'</i>	NA	\checkmark	NA	NA	N	A 44	#
								(5.0.1	500()						
	i		i			Surrogate	Outliers	5 (50-1	50%)						
Sample ID		Surrog	gate	%R	Sar	nple ID	Sur	rogate	%R	Sample ID		ple ID S		rrogate	%R
None															
		-			IS	S Outliers (-50% to -	+100%	of CCV)		1				
Area	RT		Area	RT	RT Area RT		RT	T Area		RT	Area		RT Area		RT
NA															

Comments: HTs OK for unpreserved samples. pH unknown MB, LCS, -01, unknown Dup #Parent and/or dup sample conc <5*RL and abs diff <RL; OK Sample -01 diluted 10000X

Hahn Level III NWTPH-DX Worksheet

SDG: A9F0684	Matrix: Oil	Lab Sample IDs: A9F0684-01
Seq./Batch #s:/90706	524	

							(lab limits)	(lab limi	ts)			
			Calibration				LCS					
Analyte (outliers)	2	r ² 20.990 ±20%	ICV/CCV %D ±15%	iCV/CCVRT%D±15%		5X Blank	LCS/ LCSD %R	MS %R	MSD %R	MS/D RPD	LCSD %R	LAB RPD
None								NA	NA	NA	NA	
				Surrogate O	utliers (50-	150%)						
Sample ID	Surrogate	ogate %R		nple ID	Surrogat	e %R		Sample I	D	Surroga	ite	%R
-01 (100X)	o-Terphenyl	DO										
Dup (100X)	o-Terphenyl	DO										

Comments: HTs OK. DO = Diluted out MB, LCS, -01, A9F0684-01 Dup Sample -01 diluted 100X Sample -01: F17 No fuel pattern was detected. The diesel result represents carbon range C12 to C24.

Hahn Level III Metals Worksheet

SDG: A9F068	4				Matrix:	Oil		Lab	Lab Sample IDs: A9F0684-01									
Method: 6020)A		Seq/B	Batch #:	/9061	422		·										
ICPMS Mass Cal	l: 🗌 P	ass	Fail 🛛 🛛	NA IC	PMS %I	RSD:	Pass [] Fail 🛛	NA		(80-	-120%)		(75-125%	<i>。</i>)			
		(90)-110%)	Calil	bration	1			ICS		10X		Dun			MS/		Ser.
Analyte (outliers)	r	ICV	CCV ¹	CRI	ICB	CCB ug/L	5X CCB	$\begin{vmatrix} ICS \\ $	AB %R ¹ ±40%	MB ug/L	MB ug/L	LCS %R	$\begin{array}{c c} \mathbf{B} \mathbf{a} \mathbf{p} \\ \mathbf{RPD} \\ \leq 20\% \end{array}$	MS %R	MSD %R	MSD RPD ≤40%	PS %R	Dil. %D ≤10%
None															NA	NA	NA	NA
			<i>(</i> 1	<0.10 . 00							10.0 /		(C 1 1	10504				
	S Outli	iers	(Samples	60-125%	ccv/c	CB 80-120	/%) (D T	150 0/ D	COM		IS Outli	ers	(Samples 6	0-125%; C	$\frac{CV/CCB}{D}$	80-120%)		50.0/ D
Sample ID	L16 %	or s	C45 %K	Ge/4	%K	Rh103 %	OK II	0159 %K		CRID	L16 %	oR SC2	15 %K	Ge/4 %		1103 %R		59 %K
									INA									
ll									1								<u>I</u>	

Comments: HTs OK.

MB, LCS, -01, A9F0684-01 Dup, A9F0684-01 MS

*Parent sample conc >4X spike amount

#Parent sample <RL and dup >RL; abs diff <RL; OK

Sample -01 diluted 5X

¹CRI limits 70-130% (50-150% for Sb, Pb, Tl)