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August 23, 2023

Mr. Josh Peters
On-Scene Coordinator
U.S. Environmental Protection Agency, Region 5
Superfund and Emergency Management Division
2565 Plymouth Road
Ann Arbor, MI 48105

**Subject: Data Validation Report
E Palestine Site - ER
EPA Contract No.: 68HE0519D0005
Task Order/Task Order Line Item No.: 68HE0520F0032/0001EB201
Document Tracking No. 2008**

Dear Mr. Peters:

Tetra Tech, Inc. (Tetra Tech) is submitting this data validation report for 95 air samples (including six field duplicate samples, four field blank samples, and three media blank samples) collected at the E Palestine site. The samples were collected on June 14, 16, and 17, 2023, and were analyzed for acrylates by Eurofins Analytics, LLC. The final laboratory data package was received on June 28, 2023.

Analytical data were evaluated in general accordance with the Tetra Tech *Quality Assurance Project Plan East Palestine Train Derailment Site East Palestine, Columbiana County, Ohio, Revision 3* (April 2023), the Tetra Tech *Quality Assurance Project Plan, Superfund Technical Assessment and Response Team (START V), EPA Region 5, Revision 4* (August 2022), the *National Functional Guidelines (NFG) for Organic Superfund Methods Data Review* (November 2020).

No rejection or qualification of results was required for these data packages. The results may be used as received from the laboratory.

If you have any questions regarding this data validation report, please contact me via the project manager.

Sincerely,

Digitally signed by Deb Kutsal
Date: 2023.08.24 10:34:08 -07'00'

Environmental Chemist

Enclosure

cc: Karl Schultz, Tetra Tech Program Manager
Dustin Grams, Tetra Tech Project Manager
Mayra ArroyoOrtiz, Tetra Tech Project Document Control Coordinator
TO-TOLIN File

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ATTACHMENT

**DATA VALIDATION REPORT
EUROFINS ANALYTICS, LLC REPORT NOS. B167-156, B167-158,
B170-086, AND B170-087**

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Site Name	E Palestine Site - ER	TO/TOLIN No.	68HE0520F0032/0001EB201
Document Tracking No.	2008a		
Laboratory Report No.	B167-156	Laboratory	Eurofins Analytics, LLC - Ashland, VA.
Analyses	n-Butyl Acrylate by NIOSH Method 1450M		
Samples and Matrix	29 air samples including one field blank, one media blank, and two field duplicate samples		
Collection Date(s)	06/14/2023		
Field Duplicate Pairs	EPD-PB-OD-01-061423-1/ EPD-PB-OD-011-061423-1 EPD-PB-WA-04-061423-1/ EPD-PB-WA-044-061423-1		
Field QC Blanks	EPD-PB-MB-01-061423-1 EPD-PB-FB-01-061423-1		

INTRODUCTION

This checklist summarizes the Stage 2A validation performed on the subject laboratory report, in accordance with the U.S. Environmental Protection Agency (EPA) *Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use* (January 2009). Analytical data were evaluated in general accordance with the Tetra Tech *Quality Assurance Project Plan East Palestine Train Derailment Site East Palestine, Columbiana County, Ohio, Revision 3* (April 2023), the Tetra Tech *Quality Assurance Project Plan, Superfund Technical Assessment and Response Team (START V), EPA Region 5, Revision 4* (August 2022), and the EPA *National Functional Guidelines (NFG) for Organic Superfund Methods Data Review* (November 2020).

OVERALL EVALUATION

No rejection or qualification of results was required for this data package. The results may be used as received from the laboratory.

Data completeness:

Within Criteria	Exceedance/Notes
Y	The results for the field blank and media blank were reported in units of micrograms (µg) while the other sample results were reported in units of µg, milligrams per cubic meter (mg/m ³), and parts per million (ppm) (volume) in the laboratory report and only in units of ppm in the laboratory electronic data deliverable (EDD). The site-specific QAPP specifies analysis of acrylates in air by Eurofins Analytics, LLC standard operating procedure (SOP) IHGC-001-v.22-3. The laboratory confirmed that NIOSH Method 1450M, which is mentioned in the laboratory deliverables, is equivalent to SOP IHGC-001-v.22-3; therefore, these method references may be used interchangeably

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Data completeness (continued):

Within Criteria	Exceedance/Notes
N	The extraction date and time information in the laboratory EDD do not match the laboratory report or is blank. During the data validation effort, the extraction times were removed from the validated EDD and the extraction dates for quality control samples were corrected to match the preparation log of the laboratory report.

Sample preservation, receipt, and holding times:

Within Criteria	Exceedance/Notes
Y	

Method blanks:

Within Criteria	Exceedance/Notes
Y	

Field blanks:

Within Criteria	Exceedance/Notes
Y	

Surrogates and labeled compounds:

Within Criteria	Exceedance/Notes
NA	

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

MS/MSDs:

Within Criteria	Exceedance/Notes
NA	

Laboratory duplicates:

Within Criteria	Exceedance/Notes
NA	

Field duplicates:

Within Criteria	Exceedance/Notes
Y	

LCSs/LCSDs:

Within Criteria	Exceedance/Notes
N	<p>The site-specific QAPP requires a laboratory reagent blank (LRB), laboratory media blank (LMB), laboratory control sample (LCS), and LCS duplicate (LCSD) to be analyzed per batch of 20 samples. However, the laboratory analyzed 29 field samples in one sample preparation batch consisting of one LRB, LMB, LCS, and LCSD, when the batch should have contained two LRBs, LMBs, LCSs, and LCSDs. The laboratory was contacted and directed to follow the QC sample frequencies specified in the site-specific QAPP. No qualifications were applied because the LCS/LCSD met the QAPP acceptance criteria, and the LCS/LCSD data from previous datasets for this project have met the site-specific QAPP acceptance criteria.</p> <p>The 4.0 % relative percent difference (RPD) in the Level II report does not match the 5.1% RPD in the Level IV data package. The correct RPD for the LCS and LCSD is 5.1%. No qualifications were applied because the 5.1% RPD met the site-specific QAPP 20% RPD limit.</p>

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Sample dilutions:

Within Criteria	Exceedance/Notes
NA	

Re-extraction and reanalysis:

Within Criteria	Exceedance/Notes
NA	

MDLs/RLs:

Within Criteria	Exceedance/Notes
Y	Method detection limits were not reported. Non-detect sample results are reported as less than the reporting limit in the laboratory report and at the reporting limit (flagged U) in the laboratory EDD and attached analytical results summary table.

Tentatively identified compounds:

Within Criteria	Exceedance/Notes
NA	

Other [None]:

Within Criteria	Exceedance/Notes
NA	

DATA VALIDATION CHECKLIST – STAGE 2A EPA REGION 5 START CONTRACT

Overall Qualifications:

See results summary pages attached for changes to the laboratory qualifiers based upon this validation. The following is a list of qualifiers and definitions that may be used for the validation of this data package:

J	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.
J+	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased high.
J-	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased low.
NJ	The analysis indicates the presence of an analyte that has been “tentatively identified” and the associated value is the approximate concentration of the analyte in the sample.
R	The sample result is rejected as unusable due to serious deficiencies in one or more quality control criteria. The analyte may or may not be present in the sample.
U	The analyte was analyzed for, but was not detected at or above the associated value (reporting limit).
UJ	The analyte was analyzed for, but was not detected at or above the associated value (reporting limit), which is considered approximate due to deficiencies in one or more quality control criteria.

E PALESTINE SITE - ER AIR ANALYTICAL RESULTS SUMMARY
EUROFINS ANALYTICS, LLC REPORT NO. B167-156

Samp_No	Analytical_Method	CAS_No	Analyte	Lab_Result	Lab_Qual	MDL	RL	Units	VAL_Result	VAL_Qual
EPD-PB-BKBA-01-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-BKBA-02-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-06-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-07-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-08-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-09-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-10-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-11-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-12-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-14-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-DW-B-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.009	U		0.009	ppm	0.009	U
EPD-PB-FB-01-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		2	ug	2	U
EPD-PB-MB-01-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		2	ug	2	U
EPD-PB-OD-01-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-011-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-02-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-03-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-04-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-05-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-06-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-07-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-UW-F-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-01-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-02-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-03-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-04-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-044-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-05-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-06-061423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Site Name	E Palestine Site - ER	TO/TOLIN No.	68HE0520F0032/0001EB201
Document Tracking No.	2008b		
Laboratory Report No.	B167-158	Laboratory	Eurofins Analytics, LLC - Ashland, VA
Analyses	2-Ethylhexyl acrylate and n-butyl acrylate by laboratory standard operating procedure (SOP) IHGC-P029		
Samples and Matrix	Eight air samples including one field blank		
Collection Date(s)	06/14/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-061423-1		

INTRODUCTION

This checklist summarizes the Stage 2A validation performed on the subject laboratory report, in accordance with the U.S. Environmental Protection Agency (EPA) *Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use* (January 2009). Analytical data were evaluated in general accordance with the Tetra Tech *Quality Assurance Project Plan East Palestine Train Derailment Site East Palestine, Columbiana County, Ohio, Revision 3* (April 2023), the Tetra Tech *Quality Assurance Project Plan, Superfund Technical Assessment and Response Team (START V), EPA Region 5, Revision 4* (August 2022), and the EPA *National Functional Guidelines (NFG) for Organic Superfund Methods Data Review* (November 2020).

OVERALL EVALUATION

No rejection or qualification of results was required for this data package. The results may be used as received from the laboratory.

Data completeness:

Within Criteria	Exceedance/Notes
N	<p>The results for the field blank were reported in units of micrograms (µg) while the other sample results were reported in units of µg, milligrams per cubic meter (mg/m3), and parts per million (ppm) (volume) in the laboratory report and only in units of ppm in the laboratory electronic data deliverable (EDD).</p> <p>The receipt date and time in the laboratory EDD do not match the chain-of-custody (COC) form. During the data validation effort, the receipt date and time in the validated EDD were corrected to match the date and time on the COC form.</p>

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Sample preservation, receipt, and holding times:

Within Criteria	Exceedance/Notes
Y	

Method blanks:

Within Criteria	Exceedance/Notes
Y	

Field blanks:

Within Criteria	Exceedance/Notes
Y	

Surrogates and labeled compounds:

Within Criteria	Exceedance/Notes
NA	

MS/MSDs:

Within Criteria	Exceedance/Notes
NA	

Laboratory duplicates:

Within Criteria	Exceedance/Notes
NA	

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Field duplicates:

Within Criteria	Exceedance/Notes
NA	

LCSs/LCSDs:

Within Criteria	Exceedance/Notes
N	<p>The LCS results and/or recovery values provided in the Level IV data package do not match the Level II laboratory report or the EDD. The laboratory confirmed that the values in the Level II laboratory report are correct. The LCS results and/or recovery values in the EDD were manually revised to match those in the Level II laboratory report.</p> <p>The Level II laboratory report, EDD and Level IV data package have one or more minor discrepancies in the LCSD results (+/- 1 ug) and/or percent recoveries (+/- 1%) that were verified with the laboratory to be a significant figures issue. No qualifications were applied.</p>

Sample dilutions:

Within Criteria	Exceedance/Notes
NA	

Re-extraction and reanalysis:

Within Criteria	Exceedance/Notes
NA	

MDLs/RLs:

Within Criteria	Exceedance/Notes
Y	Method detection limits were not reported. Non-detect sample results are reported as less than the reporting limit in the laboratory report and at the reporting limit (flagged U) in the EDD and attached qualified data table.

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Tentatively identified compounds:

Within Criteria	Exceedance/Notes
NA	

Other [None]:

Within Criteria	Exceedance/Notes
NA	

Overall Qualifications:

See results summary pages attached for changes to the laboratory qualifiers based upon this validation. The following is a list of qualifiers and definitions that may be used for the validation of this data package:

J	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.
J+	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased high.
J-	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased low.
NJ	The analysis indicates the presence of an analyte that has been “tentatively identified” and the associated value is the approximate concentration of the analyte in the sample.
R	The sample result is rejected as unusable due to serious deficiencies in one or more quality control criteria. The analyte may or may not be present in the sample.
U	The analyte was analyzed for, but was not detected at or above the associated value (reporting limit).
UJ	The analyte was analyzed for, but was not detected at or above the associated value (reporting limit), which is considered approximate due to deficiencies in one or more quality control criteria.

E. PALESTINE SITE - ER AIR ANALYTICAL RESULTS SUMMARY

EUROFINS ANALYTICS, LLC REPORT NO. B167-158

Sample_ID	Method	CAS_No	Analyte	Lab_Result	Lab_Qual	MDL	RL	Units	VAL_Result	VAL_Qual
EPD-ST-8H-DW-B-061423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.018	U		0.018	ppm	0.018	U
EPD-ST-8H-DW-B-061423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.012	U		0.012	ppm	0.012	U
EPD-ST-8H-UW-F-061423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015	ppm	0.015	U
EPD-ST-8H-UW-F-061423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01	ppm	0.01	U
EPD-ST-8H-WA-02-061423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U		0.014	ppm	0.014	U
EPD-ST-8H-WA-02-061423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01	ppm	0.01	U
EPD-ST-8H-WA-03-061423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U		0.014	ppm	0.014	U
EPD-ST-8H-WA-03-061423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01	ppm	0.01	U
EPD-ST-8H-WA-04-061423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.017	U		0.017	ppm	0.017	U
EPD-ST-8H-WA-04-061423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.011	U		0.011	ppm	0.011	U
EPD-ST-8H-WA-05-061423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015	ppm	0.015	U
EPD-ST-8H-WA-05-061423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01	ppm	0.01	U
EPD-ST-8H-WA-06-061423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015	ppm	0.015	U
EPD-ST-8H-WA-06-061423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01	ppm	0.01	U
EPD-ST-FB-061423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U		2.8	ug	2.8	U
EPD-ST-FB-061423-1	IHGC-P029	141-32-2	n-Butyl acrylate	1.3	U		1.3	ug	1.3	U

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Site Name	E Palestine Site - ER	TO/TOLIN No.	68HE0520F0032/0001EB201
Document Tracking No.	2008c		
Laboratory Report No.	B170-086	Laboratory	Eurofins Analytics, LLC - Ashland, VA
Analyses	n-Butyl Acrylate by NIOSH Method 1450M		
Samples and Matrix	29 air samples including one field blank sample, one media sample, and two field duplicate samples		
Collection Date(s)	06/16/2023		
Field Duplicate Pairs	EPD-PB-CM-14-061623-1/ EPD-PB-CM-144-061623-1 EPD-PB-OD-07-061623-1/ EPD-PB-OD-077-061623-1		
Field QC Blanks	EPD-PB-MB-01-061623-1 EPD-PB-FB-01-061623-1		

INTRODUCTION

This checklist summarizes the Stage 2A validation performed on the subject laboratory report, in accordance with the U.S. Environmental Protection Agency (EPA) *Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use* (January 2009). Analytical data were evaluated in general accordance with the Tetra Tech *Quality Assurance Project Plan East Palestine Train Derailment Site East Palestine, Columbiana County, Ohio, Revision 3* (April 2023), the Tetra Tech *Quality Assurance Project Plan, Superfund Technical Assessment and Response Team (START V), EPA Region 5, Revision 4* (August 2022), and the EPA *National Functional Guidelines (NFG) for Organic Superfund Methods Data Review* (November 2020).

OVERALL EVALUATION

No rejection or qualification of results was required for this data package. The results may be used as received from the laboratory.

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Data completeness:

Within Criteria	Exceedance/Notes
N	<p>The results for the field blank and media blank were reported in units of micrograms (µg) while the other sample results were reported in units of µg, milligrams per cubic meter (mg/m³), and parts per million (ppm) (volume) in the laboratory report and only in units of ppm in the laboratory electronic data deliverable (EDD).</p> <p>The site-specific QAPP specifies analysis of acrylates in air by Eurofins Analytics, LLC standard operating procedure (SOP) IHGC-001-v.22-3. The laboratory confirmed that NIOSH Method 1450M, which is mentioned in the laboratory deliverables, is equivalent to SOP IHGC-001-v.22-3; therefore, these method references may be used interchangeably.</p>

Sample preservation, receipt, and holding times:

Within Criteria	Exceedance/Notes
Y	

Method blanks:

Within Criteria	Exceedance/Notes
Y	

Field blanks:

Within Criteria	Exceedance/Notes
Y	

Surrogates and labeled compounds:

Within Criteria	Exceedance/Notes
NA	

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

MS/MSDs:

Within Criteria	Exceedance/Notes
NA	

Laboratory duplicates:

Within Criteria	Exceedance/Notes
NA	

Field duplicates:

Within Criteria	Exceedance/Notes
Y	

LCSs/LCSDs:

Within Criteria	Exceedance/Notes
N	The site-specific QAPP requires a laboratory reagent blank (LRB), laboratory media blank (LMB), laboratory control sample (LCS), and LCS duplicate (LCSD) to be analyzed per batch of 20 samples. However, the laboratory analyzed 29 field samples in one sample preparation batch consisting of one LRB, LMB, LCS, and LCSD, when the batch should have contained two LRBs, LMBs, LCSs, and LCSDs. The laboratory was contacted about the deviation from the site-specific QAPP and agreed that moving forward they would follow the quality control (QC) sample frequency requirements in the site-specific QAPP. No qualifications were applied based on professional judgment because the QC samples met the QAPP acceptance criteria and the QC samples from previous datasets for this project have met the QAPP acceptance criteria.

Sample dilutions:

Within Criteria	Exceedance/Notes
NA	

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Re-extraction and reanalysis:

Within Criteria	Exceedance/Notes
NA	

MDLs/RLs:

Within Criteria	Exceedance/Notes
Y	Method detection limits were not reported. Non-detect sample results are reported as less than the reporting limit in the laboratory report and at the reporting limit (flagged U) in the laboratory EDD and attached analytical results summary table.

Tentatively identified compounds:

Within Criteria	Exceedance/Notes
NA	

Other [None]:

Within Criteria	Exceedance/Notes
NA	

DATA VALIDATION CHECKLIST – STAGE 2A EPA REGION 5 START CONTRACT

Overall Qualifications:

See results summary pages attached for changes to the laboratory qualifiers based upon this validation. The following is a list of qualifiers and definitions that may be used for the validation of this data package:

J	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.
J+	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased high.
J-	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased low.
NJ	The analysis indicates the presence of an analyte that has been “tentatively identified” and the associated value is the approximate concentration of the analyte in the sample.
R	The sample result is rejected as unusable due to serious deficiencies in one or more quality control criteria. The analyte may or may not be present in the sample.
U	The analyte was analyzed for, but was not detected at or above the associated value (reporting limit).
UJ	The analyte was analyzed for, but was not detected at or above the associated value (reporting limit), which is considered approximate due to deficiencies in one or more quality control criteria.

E. PALESTINE SITE - ER AIR ANALYICAL RESULTS SUMMARY

EUROFINS ANALYTICS, LLC REPORT NO. B170-086

Sample_ID	Method	CAS_No	Analyte	Lab_Result	Lab_Qual	MDL	RL	Units	VAL_Result	VAL_Qual
EPD-PB-BKBA-01-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-BKBA-02-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-06-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-07-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-08-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-09-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-10-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-11-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-12-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-14-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-144-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-DW-B-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-FB-01-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		2	ug	2	U
EPD-PB-MB-01-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		2	ug	2	U
EPD-PB-OD-01-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-02-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-03-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-04-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-05-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-06-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-07-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-077-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-UW-F-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-01-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-02-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-03-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-04-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-05-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-06-061623-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Site Name	E Palestine Site - ER	TO/TOLIN No.	68HE0520F0032/0001EB201
Document Tracking No.	2008d		
Laboratory Report No.	B170-087	Laboratory	Eurofins Analytics, LLC - Ashland, VA
Analyses	n-Butyl acrylate by NIOSH Method 1450M		
Samples and Matrix	29 air samples including one field blank, one media blank, and two field duplicate samples		
Collection Date(s)	06/17/2023		
Field Duplicate Pairs	EPD-PB-BKBA-02-061723-1/ EPD-PB-BKBA-022-061723-1 EPD-PB-12-02-061723-1/ EPD-PB-BKBA-122-061723-1		
Field QC Blanks	EPD-PB-MB-01-061723-1 EPD-PB-FB-01-061723-1		

INTRODUCTION

This checklist summarizes the Stage 2A validation performed on the subject laboratory report, in accordance with the U.S. Environmental Protection Agency (EPA) *Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use* (January 2009). Analytical data were evaluated in general accordance with the Tetra Tech *Quality Assurance Project Plan East Palestine Train Derailment Site East Palestine, Columbiana County, Ohio, Revision 3* (April 2023), the Tetra Tech *Quality Assurance Project Plan, Superfund Technical Assessment and Response Team (START V), EPA Region 5, Revision 4* (August 2022), and the EPA *National Functional Guidelines (NFG) for Organic Superfund Methods Data Review* (November 2020).

OVERALL EVALUATION

No rejection or qualification of results was required for this data package. The results may be used as reported by the laboratory.

Data completeness:

Within Criteria	Exceedance/Notes
Y	The results for the field blank and media blank were reported in units of micrograms (µg) while the other sample results were reported in units of µg, milligrams per cubic meter (mg/m ³), and parts per million (ppm) (volume) in the laboratory report and only in units of ppm in the laboratory electronic data deliverable (EDD). The site-specific QAPP specifies analysis of acrylates in air by Eurofins Analytics, LLC standard operating procedure (SOP) IHGC-001-v.22-3. The laboratory confirmed that NIOSH Method 1450M, which is mentioned in the laboratory deliverables, is equivalent to SOP IHGC-001-v.22-3; therefore, these method references may be used interchangeably.

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Data completeness (continued):

Within Criteria	Exceedance/Notes
N	The time in the Date_Received field of the laboratory EDD did not match the chain-of-custody (COC) form. During the data validation effort, it was corrected in the validated EDD to match the date on the COC form. Sample EPD-PB-CM-08-061723-1 listed on the COC form was analyzed and the result reported in the Level II laboratory report and Level IV data package, but the result for this sample was missing from the original laboratory EDD. The laboratory was contacted, and they provided a revised laboratory EDD.

Sample preservation, receipt, and holding times:

Within Criteria	Exceedance/Notes
Y	

Method blanks:

Within Criteria	Exceedance/Notes
Y	

Field blanks:

Within Criteria	Exceedance/Notes
Y	

Surrogates and labeled compounds:

Within Criteria	Exceedance/Notes
NA	

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

MS/MSDs:

Within Criteria	Exceedance/Notes
NA	

Laboratory duplicates:

Within Criteria	Exceedance/Notes
NA	

Field duplicates:

Within Criteria	Exceedance/Notes
Y	

LCSs/LCSDs:

Within Criteria	Exceedance/Notes
N	<p>The site-specific QAPP requires a laboratory reagent blank (LRB), laboratory media blank (LMB), laboratory control sample (LCS), and LCS duplicate (LCSD) to be analyzed per batch of 20 samples. However, the laboratory analyzed 29 field samples in one sample preparation batch consisting of one LRB, LMB, LCS, and LCSD, when the batch should have contained two LRBs, LMBs, LCSs, and LCSDs. The laboratory was contacted about the deviation from the site-specific QAPP and agreed that moving forward they would follow the quality control (QC) sample frequency requirements in the site-specific QAPP. No qualifications were applied based on professional judgment because the QC samples met the QAPP acceptance criteria and the QC samples from previous datasets for this project have met the QAPP acceptance criteria.</p> <p>The Level II laboratory report and Level IV data package had one discrepancy in the LCS/LCSD relative percent difference (+/- 1%) that was verified with the laboratory to be a significant figures issue. No qualifications were applied.</p>

**DATA VALIDATION CHECKLIST – STAGE 2A
EPA REGION 5 START CONTRACT**

Sample dilutions:

Within Criteria	Exceedance/Notes
NA	

Re-extraction and reanalysis:

Within Criteria	Exceedance/Notes
NA	

MDLs/RLs:

Within Criteria	Exceedance/Notes
N	Method detection limits were not reported. Non-detect sample results are reported as less than the reporting limit in the laboratory report and at the reporting limit (flagged U) in the laboratory EDD and attached analytical results summary table. The laboratory incorrectly used 720 liters (L) as the sample volume for sample EPD-PB-CM-08-061723-1. The laboratory was contacted, and they provided a revised Level II report, level IV data package, and laboratory EDD which corrected the sample volume to 42 L and the reporting limits for this sample.

Tentatively identified compounds:

Within Criteria	Exceedance/Notes
NA	

Other [None]:

Within Criteria	Exceedance/Notes
NA	

DATA VALIDATION CHECKLIST – STAGE 2A EPA REGION 5 START CONTRACT

Overall Qualifications:

See results summary pages attached for changes to the laboratory qualifiers based upon this validation. The following is a list of qualifiers and definitions that may be used for the validation of this data package:

J	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.
J+	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased high.
J-	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased low.
NJ	The analysis indicates the presence of an analyte that has been “tentatively identified” and the associated value is the approximate concentration of the analyte in the sample.
R	The sample result is rejected as unusable due to serious deficiencies in one or more quality control criteria. The analyte may or may not be present in the sample.
U	The analyte was analyzed for, but was not detected at or above the associated value (reporting limit).
UJ	The analyte was analyzed for, but was not detected at or above the associated value (reporting limit), which is considered approximate due to deficiencies in one or more quality control criteria.

E. PALESTINE SITE - ER AIR ANALYTICAL RESULTS SUMMARY
EUROFINS ANALYTICS, LLC REPORT NO. B170-087

Samp_no	Method	CAS_NO	Analyte	Lab_Result	Lab_Qual	MDL	RL	Units	VAL_Result	VAL_Qual
EPD-PB-BKBA-01-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-BKBA-02-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-BKBA-022-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-06-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-07-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-08-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-09-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-10-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-11-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-12-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-122-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-CM-14-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-DW-B-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.009	U		0.009	ppm	0.009	U
EPD-PB-FB-01-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		2	ug	2	U
EPD-PB-MB-01-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		2	ug	2	U
EPD-PB-OD-01-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-02-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-03-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-04-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-05-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-06-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-OD-07-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-UW-F-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-01-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-02-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-03-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-04-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-05-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U
EPD-PB-WA-06-061723-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091	ppm	0.0091	U