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September 18, 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. 1961**

Dear Mr. Peters:

Tetra Tech, Inc. (Tetra Tech) is submitting this data validation report for 18 air samples including 2 field blank samples were collected at the E Palestine site. The samples were collected on April 13-14, 2023, and were analyzed for acrylates by Eurofins Analytics, LLC. The final revised laboratory data package was received on August 28, 2023.

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

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

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

Sincerely,

**Deb Kutsal** Digitally signed by Deb Kutsal  
Date: 2023.09.18 09:41:48  
-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. B107-121 AND  
B107-122**

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

Site Name	E Palestine Site - ER	TO/TOLIN No.	68HE0520F0032/0001EB201
Document Tracking No.	1961a		
Laboratory Report No.	B107-121	Laboratory	Eurofins Analytics, LLC - Ashland VA
Analyses	2-Ethylhexyl acrylate and n-butyl acrylate by standard operating procedure (SOP) IHGC-P029		
Samples and Matrix	Nine air samples including one field blank		
Collection Date(s)	04/13/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-041323-2		

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

**Data completeness:**

Within Criteria	Exceedance/Notes
N	<p>The chain-of-custody (COC) form was revised to correct the sample names for all non-field blank samples. The laboratory report cites the correct sample names and only the revised COC form is included in the report.</p> <p>Rohm &amp; Haas IH9805 is cited in the AIHA certification as “IHGC-P029” and may be cited by the abbreviation “Rohm &amp; Haas IH9805” or “IHGC-P029” interchangeably throughout the laboratory report.</p> <p>The sample analysis time was reported as a default value of 12 AM or 00:00 hours for the LCSD in the analysis date field of the laboratory electronic data deliverable (EDD). Since the sample analysis time for the LCSD is not required for the validated EDD; the value was not manually revised.</p> <p>The results for the field blanks were reported in units of micrograms (µg) while the other sample results were reported in units of µg, milligram per cubic meter (mg/m<sup>3</sup>), and parts per million (ppm) (volume) in the laboratory report and only ppm in the electronic data deliverable (EDD).</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	

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

**Surrogates and labeled compounds:**

Within Criteria	Exceedance/Notes
NA	

**MS/MSDs:**

Within Criteria	Exceedance/Notes
NA	

**Laboratory duplicates:**

Within Criteria	Exceedance/Notes
NA	

**Field duplicates:**

Within Criteria	Exceedance/Notes
NA	

**LCSs/LCSDs:**

Within Criteria	Exceedance/Notes
Y	

**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. Nondetect sample results are reported as less than the reporting limit in the laboratory report and at the reporting limit (flagged U) in the validated EDD and attached analytical results summary.

**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.
NF	The tentatively identified compound was manually searched for but was not found in the sample.

E PALESTINE SITE - ER AIR ANALYTICAL RESULTS SUMMARY  
EUROFINS ANALYTICS, LLC REPORT NO. B107-121

Samp_no	Analytical_Method	CAS_NO	Analyte	Lab_Result	Lab_Qual	RL	Units	Val_Results	Val_Qual
EPD-ST-FB-041323-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U		2.8 ug	2.8	U
EPD-ST-FB-041323-2	IHGC-P029	141-32-2	n-Butyl acrylate	1.3	U		1.3 ug	1.3	U
EPD-ST-8H-WA-03-041323-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-03-041323-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-05-041323-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U		0.014 ppm	0.014	U
EPD-ST-8H-WA-05-041323-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-UW-G-041323-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U		0.016 ppm	0.016	U
EPD-ST-8H-UW-G-041323-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.011	U		0.011 ppm	0.011	U
EPD-ST-8H-WA-06-041323-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-06-041323-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-02-041323-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-02-041323-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-01-041323-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U		0.014 ppm	0.014	U
EPD-ST-8H-WA-01-041323-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.009	U		0.009 ppm	0.009	U
EPD-ST-8H-WA-04-041323-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-04-041323-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-DW-C-041323-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-DW-C-041323-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	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.	1961b	Laboratory	Eurofins Analytics, LLC - Ashland, VA
Laboratory Report No.	B107-122	Analyses	
		2-Ethylhexyl acrylate and n-butyl acrylate by laboratory standard operating procedure (SOP) IHGC-P029	
Samples and Matrix	Nine air samples including one field blank		
Collection Date(s)	04/13/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-041423-1		

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

**Data completeness:**

Within Criteria	Exceedance/Notes
N	<p>Rohm &amp; Haas IH9805 is cited in the AIHA certification as “IHGC-P029” and may be cited by the abbreviation “Rohm &amp; Haas IH9805” or “IHGC-P029” interchangeably throughout the laboratory report.</p> <p>The sample analysis time was reported as a default value of 12 AM or 00:00 hours for the LCSD in the analysis date field of the laboratory electronic data deliverable (EDD). Since the sample analysis time for the LCSD is not required for the validated EDD, this value was not manually revised.</p> <p>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 deleted from the validated EDD and the extraction date was corrected (as needed) to match those in the preparation log in the laboratory report.</p> <p>A unique sample for LCSD was not provided in the laboratory EDD. Unique sample IDs are needed to avoid overwriting other QC sample data when validated EDDs are uploaded to the Scribe database. The LCSD ID in the Samp_No and Lab_Samp_No fields of the validated EDD were manually revised to match those in the laboratory report.</p> <p>The results for the field blanks were reported in units of micrograms (µg) while the other sample results were reported in units of µg, milligram per cubic meter (mg/m<sup>3</sup>), and parts per million (ppm) (volume) in the laboratory report and only ppm in the laboratory EDD.</p>

**Sample preservation, receipt, and holding times:**

Within Criteria	Exceedance/Notes
Y	

**Method blanks:**

Within Criteria	Exceedance/Notes
Y	

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

**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	

**Field duplicates:**

Within Criteria	Exceedance/Notes
NA	

**LCSs/LCSDs:**

Within Criteria	Exceedance/Notes
Y	

**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 validated EDD and attached analytical results summary.

**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:

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E PALESTINE SITE - ER AIR ANALYTICAL RESULTS SUMMARY  
EUROFINS ANALYTICS, LLC REPORT NO. B107-122

Samp_no	Method	CAS_NO	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-ST-8H-DW-C-041423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.013	U	0.013	ppm	0.013	U
EPD-ST-8H-DW-C-041423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.009	U	0.009	ppm	0.009	U
EPD-ST-8H-WA-04-041423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U	0.016	ppm	0.016	U
EPD-ST-8H-WA-04-041423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.011	U	0.011	ppm	0.011	U
EPD-ST-8H-WA-01-041423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-01-041423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-02-041423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U	0.014	ppm	0.014	U
EPD-ST-8H-WA-02-041423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-06-041423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U	0.016	ppm	0.016	U
EPD-ST-8H-WA-06-041423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.011	U	0.011	ppm	0.011	U
EPD-ST-8H-WA-05-041423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.013	U	0.013	ppm	0.013	U
EPD-ST-8H-WA-05-041423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.009	U	0.009	ppm	0.009	U
EPD-ST-8H-UW-G-041423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U	0.014	ppm	0.014	U
EPD-ST-8H-UW-G-041423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.009	U	0.009	ppm	0.009	U
EPD-ST-8H-WA-03-041423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U	0.014	ppm	0.014	U
EPD-ST-8H-WA-03-041423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-FB-041423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U	2.8	ug	2.8	U
EPD-ST-FB-041423-1	IHGC-P029	141-32-2	n-Butyl acrylate	1.3	U	1.3	ug	1.3	U