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September 5, 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. 1963**

Dear Mr. Peters:

Tetra Tech, Inc. (Tetra Tech) is submitting this data validation report for thirty-nine air samples including three field duplicate samples and five field blank samples collected at the E Palestine site. The samples were collected on April 22-23, 2023, and were analyzed for acrylates by Eurofins Analytics, LLC in their Ashland, Virginia laboratory. The final revised laboratory data package was received on August 2, 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), and 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 feel free to contact me via the project manager.

Sincerely,

Deb Kutsal

Digitally signed by Deb Kutsal
Date: 2023.09.05 12:43:19
-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 B115-183 AND B115-
184**

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

Site Name	E Palestine Site - ER	TO/TOLIN No.	68HE0520F0032/0001EB201
Document Tracking No.	1963a		
Laboratory Report No.	B115-183	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	Seven air samples including one field blank		
Collection Date(s)	4/22/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-042223-1		

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>Samples EPD-ST-8H-UW-E-042223-1 and EPD-ST-8H-WA-04-042223-1 were not analyzed due to pump failures.</p> <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, milligram per cubic meter (mg/m³), and parts per million (ppm) (volume) in the laboratory report and only ppm in the electronic data deliverable (EDD).</p> <p>The laboratory report includes the following note: “The method reference, Rohm & Haas IH9805 is referenced in the AIHA certification as “IHGC-P029.” “Rohm & Haas IH9805” is cited in the laboratory EDD for the QC samples. The laboratory confirmed that these two citations refer to the same laboratory SOP; therefore, the method reference for QC samples was manually revised in the validated EDD to “IHGC-P029,” to match the method citation for field samples.</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 sample analysis time is reported as a default value of 00:00 hours for the LCSD in the analysis date field of the laboratory 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>

Sample preservation, receipt, and holding times:

Within Criteria	Exceedance/Notes
Y	

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

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	

Field duplicates:

Within Criteria	Exceedance/Notes
NA	

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

LCSs/LCSDs:

Within Criteria	Exceedance/Notes
N	The laboratory report and the EDD have one or more minor discrepancies in the LCS/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.

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	

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

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 ANALYTICAL RESULTS SUMMARY

EUROFINS ANALYTICS, LLC REPORT NO. B115-183

Sample_ID	Method	CAS#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-ST-FB-042223-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U		2.8 ug	2.8	U
EPD-ST-FB-042223-1	IHGC-P029	141-32-2	n-Butyl acrylate	1.3	U		1.3 ug	1.3	U
EPD-ST-8H-WA-03-042223-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U		0.014 ppm	0.014	U
EPD-ST-8H-WA-03-042223-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-DW-A-042223-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-DW-A-042223-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-05-042223-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-05-042223-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-06-042223-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-06-042223-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-02-042223-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U		0.016 ppm	0.016	U
EPD-ST-8H-WA-02-042223-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.011	U		0.011 ppm	0.011	U
EPD-ST-8H-WA-01-042223-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.018	U		0.018 ppm	0.018	U
EPD-ST-8H-WA-01-042223-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.012	U		0.012 ppm	0.012	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.	1963b		
Laboratory Report No.	B115-184	Laboratory	Eurofins Analytics, LLC, Ashland VA
Analyses	n-Butyl Acrylate by National Institute for Occupational Safety and Health (NIOSH) Method 1450M		
Samples and Matrix	Thirty-two air samples including four field blanks and three field duplicate samples		
Collection Date(s)	4/23/2023		
Field Duplicate Pairs	EPD-PB-CM-099-042323-2/EPD-PB-CM-09-042323-2 EPD-PB-OD-033-042323-2/EPD-PB-OD-03-042323-2 EPD-PB-WA-066-042323-2/EPD-PB-WA-06-042323-2		
Field QC Blanks	EPD-PB-FB-02-042323-2 EPD-PB-MB-02-042323-2 EPD-PB-MB-03-042323-2 EPD-PB-FB-03-042323-2		

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 results for the field blank were reported in units of micrograms (μg) while the other sample results were reported in units of μg, milligram per cubic meter (mg/m^3), and parts per million (ppm) (volume) in the laboratory report and only ppm in the electronic data deliverable (EDD).</p> <p>The sample analysis time is reported as a default value of 00:00 hours for the LCSD in the analysis date field of the laboratory 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, extraction times were deleted from the validated EDD and the extraction dates were corrected (as needed) to match those in the preparation log in the laboratory report.</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
Y	

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. 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:

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:

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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 ANALYTICAL RESULTS SUMMARY
EUROFINS ANALYTICS, LLC REPORT NO. B115-184

Sample_ID	Method	CAS#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-PB-BKBA-01-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-BKBA-02-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-06-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-07-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-08-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-09-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-099-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-10-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-11-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-12-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-14-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-DW-C-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-FB-02-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-FB-03-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-MB-02-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-MB-03-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-OD-01-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-02-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-03-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-033-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-04-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-05-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-06-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-07-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-UW-G-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-01-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-02-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-03-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-04-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-05-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-06-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-066-042323-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U