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October 2, 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. 2066**

Dear Mr. Peters:

Tetra Tech, Inc. (Tetra Tech) is submitting this data validation report for 102 air samples (including eight field duplicate samples, six field blank samples, and five media blanks) collected at the E Palestine site. The samples were collected on April 29 and 30, 2023, and were analyzed for acrylates by Eurofins Analytics, LLC's laboratory in Ashland VA. The final laboratory data package was received on August 16, 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 qualification or rejection of results was required for these data packages.

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

Sincerely,

**Tom  
Hahne**  
Digitally signed  
by Tom Hahne  
Date: 2023.10.02  
11:53:27 -05'00'

Quality Reviewer

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

**ATTACHMENT**

**DATA VALIDATION REPORT  
EUROFINS ANALYTICS, LLC REPORT NOS.  
B122-164, B122-165, B122-167 AND B122-169**

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

Site Name	E Palestine Site - ER	TO/TOLIN No.	68HE0520F0032/0001EB201
Document Tracking No.	2066a		
Laboratory Report No.	B122-164	Laboratory	Eurofins Analytics, LLC – Ashland, VA
Analyses	n-Butyl acrylate by NIOSH Method 1450M		
Samples and Matrix	Thirty-Two air samples including two field blanks, two media blanks, and three field duplicate pairs		
Collection Date(s)	04/30/2023		
Field Duplicate Pairs	EPD-PB-CM-11-043023-2/EPD-PB-CM-111-043023-2 EPD-PB-WA-02-043023-2/EPD-PB-WA-022-043023-2 EPD-PB-WA-06-043023-2/EPD-PB-WA-066-043023-2		
Field QC Blanks	EPD-PB-FB-02-043023-2, EPD-PB-FB-03-043023-2, EPD-PB-MB-02-043023-2, and EPD-PB-MB-03-043023-2		

**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 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 and media blank were reported in units of micrograms (µg) while the other field 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> <p>To facilitate sample reporting, large sample delivery groups may be logged by the laboratory separately by individual pages of the chain of custody form. The ratio of field QC samples (field blanks, media blanks, field duplicates) to non-QC field samples is monitored independent of this validation and therefore the ratio of field QC samples to non-QC field samples was not verified during this validation. No qualifications were applied because all field sample results were nondetect.</p> <p>Note, the following fields in the laboratory EDD may be formatted as date only or as date/time: Date_Collected, Date_Received, Date_Extracted, and Date_Analyzed. The time value was not required to be provided in the EDD. If no time value was provided, then the entered value may appear as date only or with a default time value of 0:00, 00:00, or similar.</p>

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

Within Criteria	Exceedance/Notes
Y	

**Method blanks:**

Within Criteria	Exceedance/Notes
N	<p>Nondetect results for laboratory method blank LMB IHG230502C and laboratory reagent blank LRB IHG230502C were reported as "0" in the laboratory EDD rather than at the reporting limit (RL). The laboratory was contacted on August 28, 2023, and agreed to report nondetect laboratory method blank and LRB results at the RL in future laboratory EDDs. No qualifications were applied.</p>

**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
Y	

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

**LCSs/LCSDs:**

Within Criteria	Exceedance/Notes
N	<p>The site-specific QAPP requires a laboratory reagent blank (LRB), laboratory media blank, laboratory control sample (LCS), and LCS duplicate (LCSD) to be analyzed per batch of 20 samples. However, the laboratory analyzed 32 field samples in one sample preparation batch that included one LRB, laboratory media blank, LCS, and LCSD, when the batch should have included two LRBs, laboratory media blanks, LCSs, and LCSDs. The laboratory was contacted about this deviation from the site-specific QAPP and agreed that they would follow the quality control (QC) sample frequency requirements in the site-specific QAPP in future reports. No qualifications were applied based on professional judgment because the QC sample results met the QAPP acceptance criteria and the QC sample results from previous datasets for this project have met the QAPP acceptance criteria.</p> <p>Laboratory control sample LCS IHG230502C percent recovery (%R), laboratory control sample duplicate LCSD IHG230502C %R, and the relative percent difference (RPD) between the LCS and LCSD %Rs exceeded the site-specific QAPP acceptance criteria. All samples were nondetect, therefore 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. Nondetect sample results are reported as less than the RL in the laboratory report and at the RL (flagged U) in the validated EDD and attached analytical results summary.

**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. B122-164

Samp_ID	Method	CAS_#	Analyte	Lab_Result	Lab_Qual	Units	RL	VAL_Result	VAL_Qual
EPD-PB-BKBA-01-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-BKBA-02-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-CM-06-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-CM-07-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-CM-08-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-CM-09-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-CM-10-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-CM-11-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-CM-111-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-CM-12-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-CM-14-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-DW-A-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-FB-02-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	ug	2	2	U
EPD-PB-FB-03-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	ug	2	2	U
EPD-PB-MB-02-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	ug	2	2	U
EPD-PB-MB-03-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	ug	2	2	U
EPD-PB-OD-01-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-OD-02-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-OD-03-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-OD-04-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-OD-05-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-OD-06-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-OD-07-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-UW-E-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-WA-01-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-WA-02-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-WA-022-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-WA-03-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-WA-04-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-WA-05-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-WA-06-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	0.0091	U
EPD-PB-WA-066-043023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	ppm	0.0091	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.	2066b		
Laboratory Report No.	B122-165	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	Nine air samples including one field blank		
Collection Date(s)	04/30/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-043023-2		

**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 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, 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>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>Note, the following fields in the laboratory EDD may be formatted as data only or as date/time: Date_Collected, Date_Received, Date_Extracted, and Date_Analyzed. The time value was not required to be provided in the EDD. If no time value was provided, then the entered value may appear as date only or with a default time value of 0:00, 00:00, or similar.</p> <p>EPD-ST-8H-WA-02-043023-2 had a pump fault and was cancelled.</p>

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

Within Criteria	Exceedance/Notes
Y	

**Method blanks:**

Within Criteria	Exceedance/Notes
N	<p>Nondetect results for the laboratory method blank LMB IHG230502B and laboratory reagent blank LRB IHG230502B were reported as “0” in the laboratory EDD rather than at the reporting limit (RL). The laboratory was contacted on August 28, 2023, and agreed to report nondetect laboratory method blank and LRB results in future laboratory EDDs. No qualifications were applied.</p>

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

**Field blanks:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
Y	

**Surrogates and labeled compounds:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
NA	

**MS/MSDs:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
NA	

**Laboratory duplicates:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
NA	

**Field duplicates:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
N	Per the site-specific QAPP, 1 field duplicate sample is required per 20 samples collected. However, no field duplicate was collected. Based on professional judgment, no qualifications were applied.

**LCSs/LCSDs:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
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. Nondetect sample results are reported as less than the RL in the laboratory report and at the RL (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.

E PALESTINE SITE - ER AIR ANALYTICAL RESULTS SUMMARY  
EUROFINS ANALYTICS, LLC REPORT NO. B122-165

Samp_ID	Method	CAS_#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-ST-8H-DW-A-043023-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-DW-A-043023-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-UW-E-043023-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-UW-E-043023-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-01-043023-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U	0.014	ppm	0.014	U
EPD-ST-8H-WA-01-043023-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-03-043023-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U	0.016	ppm	0.016	U
EPD-ST-8H-WA-03-043023-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-04-043023-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U	0.014	ppm	0.014	U
EPD-ST-8H-WA-04-043023-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-05-043023-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-05-043023-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-06-043023-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-06-043023-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-22-043023-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U	0.016	ppm	0.016	U
EPD-ST-8H-WA-22-043023-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.011	U	0.011	ppm	0.011	U
EPD-ST-FB-043023-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U	2.8	ug	2.8	U
EPD-ST-FB-043023-2	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.	2066c		
Laboratory Report No.	B122-167	Laboratory	Eurofins Analytics, LLC – Ashland, VA
Analyses	n-Butyl acrylate by NIOSH Method 1450M		
Samples and Matrix	29 air samples including 1 field blank, 1 media blank, and two field duplicate pairs		
Collection Date(s)	04/30/2023		
Field Duplicate Pairs	EPD-PB-OD-05-043023-1/EPD-PB-OD-055-043023-1 EPD-PB-WA-03-043023-1/EPD-PB-WA-033-043023-1		
Field QC Blanks	EPD-PB-FB-01-043023-1 and EPD-PB-MB-01-043023-1		

**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 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 and media blank were reported in units of micrograms (µg) while the other field sample results were reported in units of µg, milligrams per cubic meter (mg/m<sup>3</sup>), 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> <p>To facilitate sample reporting, large sample delivery groups may be logged by the laboratory separately by individual pages of the chain of custody (COC) form. The ratio of field QC samples (field blanks, media blanks, field duplicates) to non-QC field samples is monitored independent of this validation and therefore the ratio of field QC samples to non-QC field samples was not verified during this validation. No qualifications were applied because all field sample results were nondetect.</p> <p>Note, the following fields in the laboratory EDD may be formatted as date only or as date/time: Date_Collected, Date_Received, Date_Extracted, and Date_Analyzed. The time value was not required to be provided in the EDD. If no time value was provided, then the entered value may appear as date only or with a default time value of 0:00, 00:00, or similar.</p> <p>A revised COC is included in the lab report with the media blank sample ID corrected to be EPD-PB-MB-01-043023-1.</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
N	Nondetect results for laboratory method blank LMB IHG230502D and laboratory reagent blank LRB IHG 230502D were reported as “0” in the laboratory EDD rather than at the reporting limit (RL). The laboratory was contacted on August 28, 2023, and agreed to report nondetect laboratory method blank and LRB results at the RL in future laboratory EDDs. No qualifications were applied.

**Field blanks:**

Within Criteria	Exceedance/Notes
N	Only 1 field blank sample was included in this data package although the site-specific QAPP specifies the collection of 1 field blank per 20 field samples. No qualifications were applied because all sample results were nondetect.

**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
N	Only two field duplicate samples were included in this data package although the site-specific QAPP specifies the collection of one field duplicate sample per ten field samples. Based on professional judgement, no qualifications were applied.

**LCSs/LCSDs:**

Within Criteria	Exceedance/Notes
N	The site-specific QAPP requires a laboratory reagent blank (LRB), laboratory media blank, 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 that included one LRB, laboratory media blank, LCS, and LCSD, when the batch should have included two LRBs, laboratory media blanks, LCSs, and LCSDs. The laboratory was contacted on August 8, 2023 about this deviation from the site-specific QAPP and agreed that they would follow the quality control (QC) sample frequency requirements in the site-specific QAPP in future reports. No qualifications were applied based on professional judgment because the QC sample results met the QAPP acceptance criteria and the QC sample results from previous datasets for this project have met the QAPP acceptance criteria.

**Sample dilutions:**

Within Criteria	Exceedance/Notes
NA	

**Re-extraction and reanalysis:**

Within Criteria	Exceedance/Notes
NA	

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

**MDLs/RLs:**

Within Criteria	Exceedance/Notes
Y	Method detection limits were not reported. Nondetect sample results are reported as less than the RL in the laboratory report and at the RL (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	

**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. B122-167

Samp_ID	Method	CAS_#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-PB-BKBA-01-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-BKBA-02-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-06-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-07-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-08-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-09-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-10-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-11-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-12-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-14-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-DW-A-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-FB-01-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-MB-01-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-OD-01-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-02-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-03-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-04-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-05-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-055-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-06-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-07-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-UW-E-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-01-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-02-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-03-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-033-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-04-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-05-043023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-06-043023-1	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.	2066d		
Laboratory Report No.	B122-169	Laboratory	Eurofins Analytics, LLC – Ashland, VA
Analyses	n-Butyl acrylate by NIOSH Method 1450M		
Samples and Matrix	32 air samples including 2 field blanks, 2 media blanks, and 3 field duplicate pairs		
Collection Date(s)	04/29/2023		
Field Duplicate Pairs	EPD-PB-OD-04-042923-2/EPD-PB-OD-044-042923-2 EPD-PB-OD-03-042923-2/EPD-PB-OD-033-042923-2 EPD-PB-OD-07-042923-2/EPD-PB-OD-077-042923-2		
Field QC Blanks	EPD-PB-FB-02-042923-2, EPD-PB-FB-03-042923-2, EPD-PB-MB-02-042923-2, and EPD-PB-MB-03-042923-2		

**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 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 and media blank were reported in units of micrograms (µg) while the other field sample results were reported in units of µg, milligrams per cubic meter (mg/m<sup>3</sup>), 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> <p>Note, the following fields in the laboratory EDD may be formatted as date only or as date/time: Date_Collected, Date_Received, Date_Extracted, and Date_Analyzed. The time value was not required to be provided in the EDD. If no time value was provided, then the entered value may appear as date only or with a default time value of 0:00, 00:00, or similar.</p>

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

Within Criteria	Exceedance/Notes
Y	

**Method blanks:**

Within Criteria	Exceedance/Notes
N	<p>Nondetect results for laboratory method blank LMB IHG230502E and laboratory reagent blank LRB IHG230502E were reported as "0" in the laboratory EDD rather than at the reporting limit (RL). The laboratory was contacted on August 28, 2023, and agreed to report nondetect laboratory method blank and LRB results at the RL in future laboratory EDDs. No qualifications were applied.</p>

**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
N	The site-specific QAPP requires a laboratory reagent blank (LRB), laboratory media blank, laboratory control sample (LCS), and LCS duplicate (LCSD) to be analyzed per batch of 20 samples. However, the laboratory analyzed 32 field samples in one sample preparation batch that included one LRB, laboratory media blank, LCS, and LCSD, when the batch should have included two LRBs, laboratory media blanks, LCSs, and LCSDs. The laboratory was contacted on August 8, 2023, about this deviation from the site-specific QAPP and agreed that they would follow the quality control (QC) sample frequency requirements in the site-specific QAPP in future reports. No qualifications were applied based on professional judgment because the QC sample results met the QAPP acceptance criteria and the QC sample results from previous datasets for this project have met the QAPP acceptance criteria.

**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. Nondetect sample results are reported as less than the RL in the laboratory report and at the RL (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.
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E PALESTINE SITE - ER AIR ANALYTICAL RESULTS SUMMARY  
EUROFINS ANALYTICS, LLC REPORT NO. B122-169

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EPD-PB-BKBA-02-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-06-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
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EPD-PB-CM-11-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-12-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
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EPD-PB-FB-02-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-FB-03-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-MB-02-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-MB-03-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-OD-01-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-02-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-03-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-033-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-04-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-044-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-05-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
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EPD-PB-WA-01-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-02-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-03-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-04-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-05-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-06-042923-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U