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November 10, 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. 2129**

Dear Mr. Peters:

Tetra Tech, Inc. (Tetra Tech) is submitting this data validation report for 79 air samples (including 5 field duplicate samples, 5 field blank samples, and 3 media blanks) collected at the E Palestine site. The samples were collected on July 30 and 31, 2023, and were analyzed for acrylates by Eurofins Analytics, LLC at their Ashland, Virginia laboratory. The final laboratory data package was received on August 3, 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 of results was required for these data packages. The results may be used as reported by the laboratory.

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

Sincerely,

Celina Barnett  
Cashman

Digitally signed by Celina Barnett-Cashman  
Date: 2023.11.10  
12:54:43 -06'00'

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.  
B213-160, B213-164, B213-166 AND B214-001**

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

Site Name	E Palestine Site - ER	TO/TOLIN No.	68HE0520F0032/0001EB201
Document Tracking No.	2129a		
Laboratory Report No.	B213-160	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 1 field blank		
Collection Date(s)	07/30/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-073023-1		

**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>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 was 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 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
Y	Nondetect results for laboratory method blank LMB IHG230801B and laboratory reagent blank LRB IHG230801B 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.

**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
N	The laboratory report(s) and the laboratory EDD have one or more minor discrepancies in the LCS/LCSD results (+/- 1 ug), RPDs (+/- 2%) 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	

**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:

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. B213-160

Sample_ID	Method	CAS#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-ST-8H-DW-B-073023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U	0.016	ppm	0.016	U
EPD-ST-8H-DW-B-073023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-UW-F-073023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-UW-F-073023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-01-073023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-01-073023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-02-073023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U	0.016	ppm	0.016	U
EPD-ST-8H-WA-02-073023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.011	U	0.011	ppm	0.011	U
EPD-ST-8H-WA-03-073023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-03-073023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-04-073023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U	0.014	ppm	0.014	U
EPD-ST-8H-WA-04-073023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.009	U	0.009	ppm	0.009	U
EPD-ST-8H-WA-05-073023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-05-073023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-06-073023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-06-073023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-FB-073023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U	2.8	ug	2.8	U
EPD-ST-FB-073023-1	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.	2129b		
Laboratory Report No.	B213-164	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)	07/30/2023		
Field Duplicate Pairs	EPD-PB-CM-09-073023-2 / EPD-PB-CM-099-073023-2 EPD-PB-CM-12-073023-2 / EPD-PB-CM-112-073023-2 EPD-PB-WA-05-073023-2 / EPD-PB-WA-055-073023-2		
Field QC Blanks	EPD-PB-FB-02-073023-2, EPD-PB-FB-03-073023-2, EPD-PB-MB-02-073023-2, and EPD-PB-MB-03-073023-2		

**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:**

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

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

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

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

**Method blanks:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
N	Nondetect results for laboratory method blanks LMB IHG230801F, LMB IHG230801G and laboratory reagent blanks LRB IHG230801F, and LRB IHG230801F 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:**

<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	

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

**Field duplicates:**

Within Criteria	Exceedance/Notes
Y	

**LCSs/LCSDs:**

Within Criteria	Exceedance/Notes
Y	

**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 AIR ANALYTICAL RESULTS SUMMARY  
 EUROFINS ANALYTICS, LLC REPORT NO. B213-164

Samp_ID	Method	CAS_#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-PB-BKBA-01-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-BKBA-02-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-CM-06-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-CM-07-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-CM-08-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-CM-09-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-CM-099-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-CM-10-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-CM-11-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-CM-12-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-CM-122-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-CM-14-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-DW-D-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-FB-02-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2 U		2	ug	2 U	
EPD-PB-FB-03-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2 U		2	ug	2 U	
EPD-PB-MB-02-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2 U		2	ug	2 U	
EPD-PB-MB-03-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2 U		2	ug	2 U	
EPD-PB-OD-01-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-OD-02-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-OD-03-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-OD-04-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-OD-05-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-OD-06-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-OD-07-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-UW-H-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-WA-01-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-WA-02-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-WA-03-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-WA-04-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-WA-05-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-WA-055-073023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U		0.0091	ppm	0.0091 U	
EPD-PB-WA-06-073023-2	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.	2129C		
Laboratory Report No.	B213-166	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 2 field duplicate pairs		
Collection Date(s)	07/30/2023		
Field Duplicate Pairs	EPD-PB-CM-08-073023-1 / EPD-PB-CM-088-073023-1 EPD-PB-BKBA-02-073023-1 / EPD-PB-BKBA-022-073023-1		
Field QC Blanks	EPD-ST-FB-01-073023-1 and EPD-ST-MB-01-073023-1		

**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:**

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

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

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

**Method blanks:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
N	<p>Nondetect results for laboratory method blanks LMB IHG230801H, LMB IHG230801I, and laboratory reagent blanks LRB IHG230801H, and LRB IHG230801I 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
N	Only 1 field blank and 1 media blank were included in this data package although the site-specific QAPP specifies the collection of 1 field blank and 1 media 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	

**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 1 field duplicate sample per 10 field samples. Based on professional judgement, no qualifications were applied.

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

**LCs/LCSDs:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
N	The laboratory report and laboratory EDD have one or more minor discrepancies in the LCS/LCSD results (+/- 1 ug), RPDs (+/-2%) and/or percent recoveries (+/- 1%) that were verified with the laboratory to be significant figures issue(s). No qualifications were applied.

**Sample dilutions:**

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

**Re-extraction and reanalysis:**

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

**MDLs/RLs:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
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:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
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 AIR ANALYTICAL RESULTS SUMMARY  
 EUROFINS ANALYTICS, LLC REPORT NO. B213-166

Samp_ID	Method	CAS_#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-PB-BKBA-01-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-BKBA-02-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-BKBA-022-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-CM-06-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-CM-07-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-CM-08-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-CM-088-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-CM-09-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-CM-10-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-CM-11-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-CM-12-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-CM-14-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-DW-B-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-FB-01-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2 U	U	2	ug	2 U	2 U
EPD-PB-MB-01-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2 U	U	2	ug	2 U	2 U
EPD-PB-OD-01-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-OD-02-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-OD-03-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-OD-04-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-OD-05-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-OD-06-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-OD-07-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-UW-F-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-WA-01-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-WA-02-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-WA-03-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-WA-04-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-WA-05-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	0.0091 U
EPD-PB-WA-06-073023-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091 U	U	0.0091	ppm	0.0091 U	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.	2129d		
Laboratory Report No.	B214-001	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)	07/31/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-073123-1		

**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>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 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
Y	<p>Nondetect results for laboratory method blank LMB IHG230801A and laboratory reagent blank LRB IHG230801A 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.</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
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:

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.
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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 AIR ANALYTICAL RESULTS SUMMARY  
 EUROFINS ANALYTICS, LLC REPORT NO. B214-001

Samp_ID	Method	CAS_#	Analyte	Lab_Result	Lab_Qual	Units	RL	VAL_Result	VAL_Qual
EPD-ST-8H-DW-D-073123-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	ppm	0.015	0.015	U
EPD-ST-8H-DW-D-073123-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	ppm	0.01	0.01	U
EPD-ST-8H-UW-H-073123-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	ppm	0.015	0.015	U
EPD-ST-8H-UW-H-073123-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	ppm	0.01	0.01	U
EPD-ST-8H-WA-01-073123-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	ppm	0.015	0.015	U
EPD-ST-8H-WA-01-073123-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	ppm	0.01	0.01	U
EPD-ST-8H-WA-02-073123-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	ppm	0.015	0.015	U
EPD-ST-8H-WA-02-073123-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	ppm	0.01	0.01	U
EPD-ST-8H-WA-03-073123-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	ppm	0.015	0.015	U
EPD-ST-8H-WA-03-073123-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	ppm	0.01	0.01	U
EPD-ST-8H-WA-04-073123-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U	ppm	0.016	0.016	U
EPD-ST-8H-WA-04-073123-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.011	U	ppm	0.011	0.011	U
EPD-ST-8H-WA-05-073123-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	ppm	0.015	0.015	U
EPD-ST-8H-WA-05-073123-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	ppm	0.01	0.01	U
EPD-ST-8H-WA-06-073123-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	ppm	0.015	0.015	U
EPD-ST-8H-WA-06-073123-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	ppm	0.01	0.01	U
EPD-ST-FB-073123-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U	ug	2.8	2.8	U
EPD-ST-FB-073123-1	IHGC-P029	141-32-2	n-Butyl acrylate	1.3	U	ug	1.3	1.3	U