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December 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. 2120**

Dear Mr. Peters:

Tetra Tech, Inc. (Tetra Tech) is submitting this data validation report for 83 air samples (including 7 field duplicate samples, 6 field blank samples, and 4 media blank samples) collected at the E Palestine site. The samples were collected on May 10 and 15, 2023, and were analyzed for acrylates by Eurofins Analytics, LLC. The final laboratory data package was received on October 4, 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,

Brian Liang Digitally signed by Brian Liang
Date: 2023.12.05 15:13:31 -06'00'

Environmental Scientist

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.
B132-308, B137-016, B137-017, AND B137-018**

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

Site Name	E Palestine Site - ER	TO/TOLIN No.	68HE0520F0032/0001EB201
Document Tracking No.	2120a		
Laboratory Report No.	B132-308	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)	05/10/2023		
Field Duplicate Pairs	EPD-PB-CM-09-051023-2/ EPD-PB-CM-099-051023-2 EPD-PB-CM-10-051023-2/ EPD-PB-CM-100-051023-2 EPD-PB-WA-02-051023-2/ EPD-PB-WA-022-051023-2		
Field QC Blanks	EPD-PB-FB-02-051023-2, EPD-PB-FB-03-051023-2, EPD-PB-MB-02-051023-2, and EPD-PB-MB-03-051023-2		

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 blanks and media blanks 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 separated 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 non-detect.</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>The extraction date and time information for all non-QC samples in the laboratory EDD was absent. During the validation effort, the extraction dates were added 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
N	Nondetect result for laboratory reagent blank (LRB) LRB IHG230512A was reported as “0” in the laboratory EDD rather than at the reporting limit (RL). Laboratory method blank LMB IHG230512A contained n-butyl acrylate at a concentration less than the RL. The laboratory was contacted on August 28, 2023, and resolved the laboratory method blank and LRB results in future laboratory EDDs. During validation these results were reported as nondetect at the RL. No qualifications were applied because the laboratory is only reporting down to the RL and all n-butyl acrylate sample results were nondetect.

Field blanks:

Within Criteria	Exceedance/Notes
Y	

Surrogates and labeled compounds:

Within Criteria	Exceedance/Notes
NA	

MS/MSDs:

Within Criteria	Exceedance/Notes
NA	

Laboratory duplicates:

Within Criteria	Exceedance/Notes
NA	

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

Field duplicates:

Within Criteria	Exceedance/Notes
Y	

LCSs/LCSDs:

Within Criteria	Exceedance/Notes
N	<p>The laboratory report and laboratory EDD have one or more minor discrepancies in the LCS/LCSD results (+/- ug), RPDs (+/-2%), and/or percent recoveries (+/-1%) that were verified with the laboratory to be significant figures issue(s). No qualifications were applied.</p> <p>The site-specific QAPP requires a 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 moving forward they would follow the quality control (QC) sample frequency requirements in the site-specific QAPP. No qualifications were applied based on professional judgment because the QC 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>

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. B132-308

Sample_ID	Method	CAS#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-PB-BKBA-01-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-BKBA-02-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-CM-06-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-CM-07-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-CM-08-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-CM-09-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-CM-099-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-CM-100-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-CM-10-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-CM-11-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-CM-12-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-CM-14-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-DW-E-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-FB-02-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		ug	2	U
EPD-PB-FB-03-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		ug	2	U
EPD-PB-MB-02-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		ug	2	U
EPD-PB-MB-03-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		ug	2	U
EPD-PB-OD-01-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-OD-02-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-OD-03-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-OD-04-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-OD-05-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-OD-06-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-OD-07-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-UW-A-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-WA-01-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-WA-02-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-WA-022-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-WA-03-051023-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-WA-04-051023-2	NIOSH Method 1450M	141-32-3	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-WA-05-051023-2	NIOSH Method 1450M	141-32-4	n-Butyl acrylate	0.0091	U		ppm	0.0091	U
EPD-PB-WA-06-051023-2	NIOSH Method 1450M	141-32-5	n-Butyl acrylate	0.0091	U		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.	2120b		
Laboratory Report No.	B137-016	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)	05/15/2023		
Field Duplicate Pairs	EPD-PB-OD-06-051523-2/EPD-PB-OD-066-051523-2 EPD-PB-WA-01-051523-2/EPD-PB-WA-011-051523-2 EPD-PB-WA-02-051523-2/EPD-PB-WA-022-051523-2		
Field QC Blanks	EPD-PB-MB-02-051523-2, EPD-PB-MB-03-051523-2, EPD-PB-FB-02-051523-2, and EPD-PB-FB-03-051523-2		

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 blanks and media blanks 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 separated 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 non-detect.</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	

**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	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 moving forward they would follow the quality control (QC) sample frequency requirements in the site-specific QAPP. No qualifications were applied based on professional judgment because the QC 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	

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	

**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. B137-016

Sample_ID	Method	CAS#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-PB-BKBA-01-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-BKBA-02-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-CM-06-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-CM-07-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-CM-08-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-CM-09-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-CM-10-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-CM-11-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-CM-12-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-CM-14-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-DW-C-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-FB-02-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		2 ug	2	U
EPD-PB-FB-03-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		2 ug	2	U
EPD-PB-MB-02-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		2 ug	2	U
EPD-PB-MB-03-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U		2 ug	2	U
EPD-PB-OD-01-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-OD-02-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-OD-03-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-OD-04-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-OD-05-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-OD-06-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-OD-066-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-OD-07-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-UW-G-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-WA-01-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-WA-011-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-WA-02-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-WA-022-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-WA-03-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-WA-04-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-WA-05-051523-2	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U		0.0091 ppm	0.0091	U
EPD-PB-WA-06-051523-2	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.	2120c		
Laboratory Report No.	B137-017	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	9 air samples including 1 field blank		
Collection Date(s)	05/15/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-051523-1		

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/m^3), and parts per million (ppm) (volume) in the laboratory report and only in units of ppm in the laboratory electronic data deliverable (EDD).</p> <p>Rohm & Haas IH9805 is cited in the AIHA certification as “IHGC-P029” and may be cited by the abbreviation “Rohm & Haas IH9805” or “IHGC-P029” interchangeably throughout the laboratory report.</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> <p>The extraction date and time information in the laboratory EDD was absent for all non-QC samples. During the data validation effort, the extraction dates were added (as needed) to match those in the preparation log in the laboratory report.</p> <p>A unique sample ID 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>

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

Sample preservation, receipt, and holding times:

Within Criteria	Exceedance/Notes
Y	

Method blanks:

Within Criteria	Exceedance/Notes
N	Nondetect results for laboratory method blank LMB IHG230517C and laboratory reagent blank LRB IHG230517C were reported as “0” in the laboratory EDD rather than at the reporting limit (RL). These results were reported as nondetect at the RL during the data validation effort. 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
Y	

Surrogates and labeled compounds:

Within Criteria	Exceedance/Notes
NA	

MS/MSDs:

Within Criteria	Exceedance/Notes
NA	

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

Laboratory duplicates:

Within Criteria	Exceedance/Notes
NA	

Field duplicates:

Within Criteria	Exceedance/Notes
N	Per the site-specific QAPP, 1 field duplicate sample is required per 20 samples collected. However, fewer than 1 field duplicate sample per 20 samples were collected with this sample group. Based on professional judgement, no qualifications were applied.

LCSs/LCSDs:

Within Criteria	Exceedance/Notes
N	The laboratory report and laboratory EDD have one minor discrepancy in the LCSD results (+/- 1 ug) that was 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	

**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	

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. B137-017

Sample_ID	Method	CAS#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-ST-8H-DW-E-051523-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U		0.014 ppm	0.014	U
EPD-ST-8H-DW-E-051523-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.009	U		0.009 ppm	0.009	U
EPD-ST-8H-UW-A-051523-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U		0.014 ppm	0.014	U
EPD-ST-8H-UW-A-051523-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-01-051523-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-01-051523-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-02-051523-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-02-051523-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-03-051523-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U		0.014 ppm	0.014	U
EPD-ST-8H-WA-03-051523-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-04-051523-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U		0.014 ppm	0.014	U
EPD-ST-8H-WA-04-051523-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.009	U		0.009 ppm	0.009	U
EPD-ST-8H-WA-05-051523-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U		0.014 ppm	0.014	U
EPD-ST-8H-WA-05-051523-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.009	U		0.009 ppm	0.009	U
EPD-ST-8H-WA-06-051523-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-06-051523-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-FB-051523-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U		2.8 ug	2.8	U
EPD-ST-FB-051523-1	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.	2120d		
Laboratory Report No.	B137-018	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	10 air samples including 1 field blank and 1 field duplicate pair		
Collection Date(s)	05/15/2023		
Field Duplicate Pairs	EPD-ST-8H-WA-02-051523-2/EPD-ST-8H-WA-22-051523-2		
Field QC Blanks	EPD-ST-FB-051523-2		

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, 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 & Haas IH9805 is cited in the AIHA certification as “IHGC-P029” and may be cited by the abbreviation “Rohm & 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> <p>The extraction date and time information in the laboratory EDD was absent for all non-QC samples. During the data validation effort, the extraction dates were added (as needed) to match those in the preparation log in the laboratory report.</p> <p>A unique sample ID 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 in the Samp_No and Lab_Samp_No fields of the validated EDD were manually revised to match those 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	Nondetect results for laboratory method blank LMB IHG230517C and laboratory reagent blank (LRB) LRB IHG230517C 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. These results were reported as nondetect at the RL during the data validation effort.

Field blanks:

Within Criteria	Exceedance/Notes
Y	

Surrogates and labeled compounds:

Within Criteria	Exceedance/Notes
NA	

MS/MSDs:

Within Criteria	Exceedance/Notes
NA	

Laboratory duplicates:

Within Criteria	Exceedance/Notes
NA	

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

Field duplicates:

Within Criteria	Exceedance/Notes
Y	

LCSs/LCSDs:

Within Criteria	Exceedance/Notes
N	The laboratory report and the laboratory EDD have one minor discrepancy in the LCSD results (+/- 1 ug) that was 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. 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.
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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.
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E PALESTINE SITE - ER AIR ANALYTICAL RESULTS SUMMARY

EUROFINS ANALYTICS, LLC REPORT NO. B137-018

Sample_ID	Method	CAS#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-ST-8H-DW-C-051523-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-DW-C-051523-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-UW-G-051523-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-UW-G-051523-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-01-051523-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U		0.016 ppm	0.016	U
EPD-ST-8H-WA-01-051523-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-02-051523-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-02-051523-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-03-051523-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-03-051523-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-04-051523-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-04-051523-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-05-051523-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-05-051523-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-06-051523-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U		0.016 ppm	0.016	U
EPD-ST-8H-WA-06-051523-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.011	U		0.011 ppm	0.011	U
EPD-ST-8H-WA-22-051523-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.018	U		0.018 ppm	0.018	U
EPD-ST-8H-WA-22-051523-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.012	U		0.012 ppm	0.012	U
EPD-ST-FB-051523-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U		2.8 ug	2.8	U
EPD-ST-FB-051523-2	IHGC-P029	141-32-2	n-Butyl acrylate	1.3	U		1.3 ug	1.3	U