



December 12, 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

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**Subject: Data Validation Report  
E Palestine Site - ER  
EPA Contract No.: 68HE0519D0005  
Task Order/Task Order Line Item No.: 68HE0520F0032 / 0001EB201  
Document Tracking No. 2148**

Dear Mr. Peters:

Tetra Tech, Inc. (Tetra Tech) is submitting these data validation reports for 56 air samples (including 3 field duplicate samples and 4 field blanks, and 1 media blanks) collected at the E Palestine site. The samples were collected on June 30, 2023, July 03, 2023, and July 04, 2023, and were analyzed for acrylates by Eurofins Analytics, LLC. The final laboratory data package was received on July 07, 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. 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,

Jorge A. Sanchez-Quinonez  
Digitally signed by Jorge A. Sanchez-Quinonez  
Date: 2023.12.12 13:53:51 -05'00'

Chemical Engineer, P.E.

Enclosure

cc: Karl Schultz, Tetra Tech Program Manager  
Dustin Grams, Tetra Tech Project Manager  
Mayra Arroyo Ortiz, Tetra Tech Project Document Control Coordinator  
TO-TOLIN File

**ATTACHMENT**

**DATA VALIDATION REPORT  
EUROFINS ANALYTICS, LLC REPORT NOS. B186-016, B187-001,  
B187-002, AND B187-004**

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

Site Name	E Palestine Site – ER	TO/TOLIN No.	68HE0520F0032 / 0001EB201
Document Tracking No.	2148a		
Laboratory Report No.	B186-016	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	Eight air samples including one field blank sample		
Collection Date(s)	06/30/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-063023-1		

**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 (QAPP), 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>The laboratory report included the following note: “The method reference, Rohm &amp; Haas IH9805 is referenced to the American Industrial Hygiene Association certification as IHGC-P029.” The method is referred to by the abbreviation “Rohm &amp; Haas IH9805” or “IHGC-P029” 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 IHG230705J and laboratory reagent blank (LRB) LRB IHG230705J 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
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.

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

**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. 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 qualified data table.

**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. B186-016

Samp_ID	Method	CAS#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Resul	VAL_Qual
EPD-ST-8H-UW-D-063023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-UW-D-063023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-01-063023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-01-063023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-02-063023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U		0.014 ppm	0.014	U
EPD-ST-8H-WA-02-063023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-03-063023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-03-063023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-04-063023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-04-063023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-05-063023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-05-063023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-06-063023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-06-063023-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-FB-063023-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U		2.8 ug	2.8	U
EPD-ST-FB-063023-1	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.	2148b		
Laboratory Report No.	B187-001	Laboratory	Eurofins Analytics, LLC – Ashland, VA
Analyses	n-Butyl acrylate analysis 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)	07/04/2023		
Field Duplicate Pairs	EPD-PB-CM-10-070423-1/EPD-PB-CM-100-070423-1 EPD-PB-OD-06-070423-1/EPD-PB-OD-066-070423-1		
Field QC Blanks	EPD-PB-FB-01-070423-1 and EPD-PB-MB-01-070423-1		

**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 (QAPP), 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 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 separated by individual pages of the chain of custody form. The ratio of field quality control (QC) samples (field blanks, media blanks, and 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 IHG230706A and laboratory reagent blank (LRB) LRB IHG230706A 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 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	

**Field duplicates:**

Within Criteria	Exceedance/Notes
N	Two field duplicate sample 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**

**LCSs/LCSDs:**

Within Criteria	Exceedance/Notes
N	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 29 field samples in 1 sample preparation batch that included 1 LRB, laboratory media blank, LCS, and LCSD, when the batch should have included 2 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 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	

**MDLs/RLs:**

Within Criteria	Exceedance/Notes
Y	Method detection limits were not reported. Non-detect 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 qualified data table.

**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. B187-001

Samp_ID	Method	CAS#	Analyte	Lab_Result	Lab_Qual	RL	Units	Val_Result	Val_Qual
EPD-PB-BKBA-01-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-BKBA-02-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-06-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-07-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-08-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-09-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-100-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-10-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-11-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-12-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-CM-14-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-DW-B-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.009	U	0.009	ppm	0.009	U
EPD-PB-FB-01-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-MB-01-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-OD-01-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-02-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-03-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-04-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-05-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-06-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-066-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-OD-07-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-UW-F-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-01-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-02-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-03-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-04-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-05-070423-1	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0091	U	0.0091	ppm	0.0091	U
EPD-PB-WA-06-070423-1	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.	2148c		
Laboratory Report No.	B187-002	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 sample		
Collection Date(s)	07/03/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-070323-1		

**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 (QAPP), 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>The laboratory report included the following note: “The method reference, Rohm &amp; Haas IH9805 is referenced to the AIHA [American Industrial Hygiene Association] certification as IHGC-P029.” The method is referred to by the abbreviation “Rohm &amp; Haas IH9805” or “IHGC-P029” 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 IHG230706E and laboratory reagent blank (LRB) LRB IHG230706E 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
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
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 (MDL) 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 qualified data table.

**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. B187-002

Samp_ID	Method	CAS#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Resul	VAL_Qual
EPD-ST-8H-DW-A-070323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-DW-A-070323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-UW-E-070323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U		0.016 ppm	0.016	U
EPD-ST-8H-UW-E-070323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.011	U		0.011 ppm	0.011	U
EPD-ST-8H-WA-01-070323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-01-070323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-02-070323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-02-070323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-03-070323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-03-070323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-04-070323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-04-070323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-05-070323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-05-070323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-06-070323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-06-070323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-FB-070323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U		2.8 ug	2.8	U
EPD-ST-FB-070323-1	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.	2148d		
Laboratory Report No.	B187-004	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 sample, and 1 field duplicate pair		
Collection Date(s)	07/04/2023		
Field Duplicate Pairs	EPD-ST-8H-WA-05-070423-2/EPD-ST-8H-WA-55-070423-2		
Field QC Blanks	EPD-ST-FB-070423-2		

**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>The laboratory report included the following note: “The method reference, Rohm &amp; Haas IH9805 is referenced to the AIHA [American Industrial Hygiene Association] certification as IHGC-P029.” The method is referred to by the abbreviation “Rohm &amp; Haas IH9805” or “IHGC-P029” 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 IHG230706E and laboratory reagent blank (LRB) LRB IHG230706E 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	

**LCSs/LCSDs:**

Within Criteria	Exceedance/Notes
Y	

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

**Sample dilutions:**

Within Criteria	Exceedance/Notes
NA	

**Re-extraction and reanalysis:**

Within Criteria	Exceedance/Notes
NA	

**MDLs/RLs:**

Within Criteria	Exceedance/Notes
Y	Method detection limits were not reported. 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 qualified data table.

**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. B187-004

Samp_ID	Method	CAS#	Analyte	Lab_Result	Lab_Qual	RL	Units	VAL_Result	VAL_Qual
EPD-ST-8H-DW-E-070423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-DW-E-070423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-UW-A-070423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-UW-A-070423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-01-070423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-01-070423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-02-070423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-02-070423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-03-070423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U		0.016 ppm	0.016	U
EPD-ST-8H-WA-03-070423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.011	U		0.011 ppm	0.011	U
EPD-ST-8H-WA-04-070423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-04-070423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-05-070423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-05-070423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-06-070423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-06-070423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-8H-WA-55-070423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U		0.015 ppm	0.015	U
EPD-ST-8H-WA-55-070423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U		0.01 ppm	0.01	U
EPD-ST-FB-070423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U		2.8 ug	2.8	U
EPD-ST-FB-070423-2	IHGC-P029	141-32-2	n-Butyl acrylate	1.3	U		1.3 ug	1.3	U