



December 15, 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. 2264**

Dear Mr. Peters:

Tetra Tech, Inc. (Tetra Tech) is submitting this data validation report for 47 air samples (including 3 field duplicate samples, 4 field blank samples, and 1 media blank sample) collected at the E Palestine site. The samples were collected on September 2 through September 4, 2023, and were analyzed for acrylates by Eurofins Analytics, LLC. The final laboratory data package was received on September 14, 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,

**Kayla Phye** Digitally signed by Kayla Phye  
Date: 2023.12.15 08:48:37  
-07'00'

Environmental Chemist

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

**ATTACHMENTS**

**DATA VALIDATION REPORT  
EUROFINS ANALYTICS, LLC REPORT NOS.  
B249-005, B249-006, B249-007, B249-008**

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

Site Name	E Palestine Site – ER	TO/TOLIN No.	68HE0520F0032/0001EB201
Document Tracking No.	2264a		
Laboratory Report No.	B249-005	Laboratory	Eurofins Analytics, LLC – Ashland, VA
Analyses	n-Butyl acrylate by NIOSH Method 1450M		
Samples and Matrix	19 air samples including 1 field blank, 1 media blank, and 2 field duplicate pairs		
Collection Date(s)	09/02/2023		
Field Duplicate Pairs	EPD-PB-OD-03-090223/EPD-PB-OD-033-090223 EPD-PB-WA-05-090223/EPD-PB-WA-055-090223		
Field QC Blanks	EPD-PB-FB-01-090223 and EPD-PB-MB-01-090223		

**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 sample and media blank sample 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>The ratio of field quality control (QC) samples (field blank samples, media blank samples, field duplicate samples) 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>Sample EPD-PB-WA-055-090223 was incorrectly identified on the chain of custody (COC) as EPD-PB-WA-55-090223. The COC was revised on September 7, 2023 to reflect the correct sample ID.</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	

**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 were 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. B249-005

Sample ID	Method	CAS#	Analyte	Lab Result	Lab Qual	RL	Units	VAL_Result	VAL_Qual
EPD-PB-DW-H-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-FB-01-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-MB-01-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	2	U	2	ug	2	U
EPD-PB-OD-01-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-OD-02-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-OD-03-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-OD-033-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-OD-04-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-OD-05-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-OD-06-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-OD-07-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-UW-D-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-WA-01-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-WA-02-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-WA-03-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-WA-04-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-WA-05-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-WA-055-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	U
EPD-PB-WA-06-090223	NIOSH Method 1450M	141-32-2	n-Butyl acrylate	0.0045	U	0.0045	ppm	0.0045	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.	2264b		
Laboratory Report No.	B249-006	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)	09/04/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-090423-1		

**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 sample 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> <p>To facilitate sample reporting, large sample delivery groups may be logged by the laboratory separately by individual pages of the chain of custody (COC) form.</p> <p>The original laboratory recipient date on the COC was listed as September 4, 2023; this was updated to reflect the proper laboratory recipient date of September 5, 2023.</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
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
N	The average percent recovery of 2-ethylhexyl acrylate in the laboratory control sample (LCS) and laboratory control sample duplicate (LCSD) was greater than the site-specific QAPP addendum 3 acceptance criteria. However, all samples were nondetect for 2-ethylhexyl acrylate; therefore, 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 (MDL) were not reported. Nondetect sample results were 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. B249-006

Sample ID	Method	CAS#	Analyte	Lab Result	Lab Qual	RL	Units	VAL_Result	VAL_Qual
EPD-ST-8H-DW-C-090423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-DW-C-090423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-UW-G-090423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-UW-G-090423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-01-090423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-01-090423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-02-090423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-02-090423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-03-090423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U	0.014	ppm	0.014	U
EPD-ST-8H-WA-03-090423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.009	U	0.009	ppm	0.009	U
EPD-ST-8H-WA-04-090423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-04-090423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-05-090423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-05-090423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-06-090423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U	0.014	ppm	0.014	U
EPD-ST-8H-WA-06-090423-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-FB-090423-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U	2.8	ug	2.8	U
EPD-ST-FB-090423-1	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.	2264c		
Laboratory Report No.	B249-007	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)	09/04/2023		
Field Duplicate Pairs	EPD-ST-8H-WA-06-090423-2/EPD-ST-8H-WA-66-090423-2		
Field QC Blanks	EPD-ST-FB-090423-2		

**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 sample 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> <p>To facilitate sample reporting, large sample delivery groups may be logged by the laboratory separately by individual pages of the chain of custody (COC) form.</p> <p>The original laboratory recipient date on the COC was listed as September 4, 2023; this was updated to reflect the proper laboratory recipient date of September 5, 2023.</p> <p>The level II laboratory report did not contain the extraction preparation sheet; therefore, the level IV laboratory report was used to review the extraction preparation form.</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 percent recovery of 2-ethylhexyl acrylate in the laboratory control sample duplicate (LCSD) was greater than the site-specific QAPP addendum 3 acceptance criteria. However, the average percent recovery in the laboratory control sample (LCS) and the LCSD was within criteria; therefore, 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 (MDL) were not reported. Nondetect sample results were 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. B249-007

Sample ID	Method	CAS#	Analyte	Lab Result	Lab Qual	RL	Units	VAL_Result	VAL_Qual
EPD-ST-8H-DW-C-090423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-DW-C-090423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-UW-G-090423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-UW-G-090423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-01-090423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-01-090423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-02-090423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-02-090423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-03-090423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-03-090423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-04-090423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-04-090423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-05-090423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-05-090423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-06-090423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-06-090423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-66-090423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-66-090423-2	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-FB-090423-2	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U	2.8	ug	2.8	U
EPD-ST-FB-090423-2	IHGC-P029	141-32-2	n-Butyl acrylate	1.3	U	1.3	ug	1.3	U

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

Site Name	E Palestine Site – ER	TO/TOLIN No.	68HE0520F0032/0001EB201
Document Tracking No.	2264d		
Laboratory Report No.	B249-008	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)	09/03/2023		
Field Duplicate Pairs	None		
Field QC Blanks	EPD-ST-FB-090323-1		

**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
Y	<p>The results for the field blank sample 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> <p>To facilitate sample reporting, large sample delivery groups may be logged by the laboratory separately by individual pages of the chain of custody (COC) form.</p>

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

Within Criteria	Exceedance/Notes
Y	

**Method blanks:**

Within Criteria	Exceedance/Notes
Y	

**Field blanks:**

Within Criteria	Exceedance/Notes
Y	

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

**Surrogates and labeled compounds:**

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

**MS/MSDs:**

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

**Laboratory duplicates:**

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

**Field duplicates:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
N	Per the site-specific QAPP, 1 field duplicate sample is required per 20 samples collected. However, 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:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
N	The average percent recovery of 2-ethylhexyl acrylate in the laboratory control sample (LCS) and laboratory control sample duplicate (LCSD) was greater than the site-specific QAPP addendum 3 acceptance criteria. However, all samples were nondetect for 2-ethylhexyl acrylate; therefore, no qualifications were applied.

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

**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 (MDL) were not reported. Nondetect sample results were 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:**

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

**Other [None]:**

<b>Within Criteria</b>	<b>Exceedance/Notes</b>
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. B249-008

Sample ID	Method	CAS#	Analyte	Lab Result	Lab Qual	RL	Units	VAL_Result	VAL_Qual
EPD-ST-8H-DW-C-090323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-DW-C-090323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-UW-G-090323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.014	U	0.014	ppm	0.014	U
EPD-ST-8H-UW-G-090323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-01-090323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-01-090323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-02-090323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.016	U	0.016	ppm	0.016	U
EPD-ST-8H-WA-02-090323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-03-090323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-03-090323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-04-090323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-04-090323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-05-090323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-05-090323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-8H-WA-06-090323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	0.015	U	0.015	ppm	0.015	U
EPD-ST-8H-WA-06-090323-1	IHGC-P029	141-32-2	n-Butyl acrylate	0.01	U	0.01	ppm	0.01	U
EPD-ST-FB-090323-1	IHGC-P029	103-11-7	2-Ethylhexyl acrylate	2.8	U	2.8	ug	2.8	U
EPD-ST-FB-090323-1	IHGC-P029	141-32-2	n-Butyl acrylate	1.3	U	1.3	ug	1.3	U