

3/11/2019 Mr. Jim Tomalia Arcadis U.S., Inc. 28550 Cabot Dr. Suite 500 Novi MI 48377

Project Name: Ford LTP Project #: Workorder #: 1903098

Dear Mr. Jim Tomalia

The following report includes the data for the above referenced project for sample(s) received on 3/4/2019 at Air Toxics Ltd.

The data and associated QC analyzed by Modified TO-15 are compliant with the project requirements or laboratory criteria with the exception of the deviations noted in the attached case narrative.

Thank you for choosing Eurofins Air Toxics Inc. for your air analysis needs. Eurofins Air Toxics Inc. is committed to providing accurate data of the highest quality. Please feel free to contact the Project Manager: Ausha Scott at 916-985-1000 if you have any questions regarding the data in this report.

Regards,

Scott

Ausha Scott Project Manager

A Eurofins Lancaster Laboratories Company

180 Blue Ravine Road, Suite B Folsom, CA 95630



#### WORK ORDER #: 1903098

#### Work Order Summary

CLIENT:	Mr. Jim Tomalia Arcadis U.S., Inc. 28550 Cabot Dr. Suite 500 Novi, MI 48377	BILL TO:	Accounts Payable Arcadis U.S., Inc. 630 Plaza Drive Suite 600 Highlands Ranch, CO 80129
PHONE:	517-819-0356	<b>P.O.</b> #	MI001454.0003
FAX:		PROJECT #	Ford LTP
DATE RECEIVED: DATE COMPLETED:	03/04/2019 03/11/2019	CONTACT:	Ausha Scott

			KECEIPI	FINAL
FRACTION #	NAME	TEST	VAC./PRES.	PRESSURE
01A	AA-12087Stark-01_022619	Modified TO-15	5.1 "Hg	5.5 psi
02A	IAF-12087Stark-01_022619	Modified TO-15	5.7 "Hg	5.1 psi
03A	IAG-12087Stark-03_022619	Modified TO-15	4.9 "Hg	5 psi
04A	IAG-12087Stark-04_022619	Modified TO-15	4.1 "Hg	4.9 psi
05A	Lab Blank	Modified TO-15	NA	NA
06A	CCV	Modified TO-15	NA	NA
07A	LCS	Modified TO-15	NA	NA
07AA	LCSD	Modified TO-15	NA	NA

CERTIFIED BY:

Lai

DATE: 03/11/19

DECEIDT

TINAT

Technical Director

Certification numbers: AZ Licensure AZ0775, NJ NELAP - CA016, NY NELAP - 11291, TX NELAP - T104704434-15-9, UT NELAP CA0093332015-6, VA NELAP - 8113, WA NELAP - C935 Name of Accreditation Body: NELAP/ORELAP (Oregon Environmental Laboratory Accreditation Program) Accreditation number: CA300005, Effective date: 10/18/2015, Expiration date: 10/17/2016. Eurofins Air Toxics Inc.. certifies that the test results contained in this report meet all requirements of the NELAC standards

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180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630 (916) 985-1000 . (800) 985-5955 . FAX (916) 985-1020

#### LABORATORY NARRATIVE Modified TO-15 Arcadis U.S., Inc. Workorder# 1903098

Four 6 Liter Summa Canister (100% Certified) samples were received on March 04, 2019. The laboratory performed analysis via modified EPA Method TO-15 using GC/MS in the full scan mode.

This workorder was independently validated prior to submittal using 'USEPA National Functional Guidelines' as generally applied to the analysis of volatile organic compounds in air. A rules-based, logic driven, independent validation engine was employed to assess completeness, evaluate pass/fail of relevant project quality control requirements and verification of all quantified amounts.

Method modifications taken to run these samples are summarized in the table below. Specific project requirements may over-ride the ATL modifications.

Requirement	TO-15	ATL Modifications
Initial Calibration	<pre><!--=30% RSD with 2 compounds allowed out to < 40% RSD</pre--></pre>	=30% RSD with 4 compounds allowed out to < 40% RSD</td
Blank and standards	Zero Air	UHP Nitrogen provides a higher purity gas matrix than zero air

### **Receiving Notes**

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There were no receiving discrepancies.

### **Analytical Notes**

As per project specific client request the laboratory has reported estimated values for target compound hits that are below the Reporting Limit but greater than the Method Detection Limit. All The canisters used for this project have been certified to the Reporting Limit for the target analytes included in this workorder. Concentrations that are below the level at which the canister was certified may be false positives.

### **Definition of Data Qualifying Flags**

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:

B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).

- J Estimated value.
- E Exceeds instrument calibration range.
- S Saturated peak.
- Q Exceeds quality control limits.

U - Compound analyzed for but not detected above the reporting limit, LOD, or MDL value. See data page for project specific U-flag definition.

UJ- Non-detected compound associated with low bias in the CCV

N - The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:



a-File was requantified

- b-File was quantified by a second column and detector
- r1-File was requantified for the purpose of reissue

Air Toxics

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Lab ID:         1903098-01           Date/Time Collected:         2/27/19 03:		Date/Time A Dilution Fac Instrument/F	tor:	3/7/19 06:58 PM 1.66 msd22.i / 22030710	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	0.12	0.33	0.66	Not Detected
1,4-Dioxane	123-91-1	0.14	0.30	0.60	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.14	0.33	0.66	Not Detected
Tetrachloroethene	127-18-4	0.068	0.56	1.1	Not Detected
trans-1,2-Dichloroethene	156-60-5	0.10	0.33	0.66	Not Detected
Trichloroethene	79-01-6	0.096	0.45	0.89	Not Detected
Vinyl Chloride	75-01-4	0.060	0.21	0.42	Not Detected
D: Analyte not within the DoD sco	be of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	104
4-Bromofluorobenzene	460-00-4			70-130	98
Toluene-d8	2037-26-5			70-130	94

Air Toxics

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Lab ID: 19 Date/Time Collected: 2/	F-12087Stark-01_022619 903098-02A 27/19 04:02 PM Liter Summa Canister (100% Certified)	Date/Time A Dilution Fact Instrument/F	tor:	3/7/19 07:34 PM 1.66 msd22.i / 22030711	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit ) (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	0.12	0.33	0.66	Not Detected
1,4-Dioxane	123-91-1	0.14	0.30	0.60	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.14	0.33	0.66	Not Detected
Tetrachloroethene	127-18-4	0.068	0.56	1.1	Not Detected
trans-1,2-Dichloroethene	9 156-60-5	0.10	0.33	0.66	Not Detected
Trichloroethene	79-01-6	0.096	0.45	0.89	Not Detected
Vinyl Chloride	75-01-4	0.060	0.21	0.42	Not Detected
D: Analyte not within the	DoD scope of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	101
4-Bromofluorobenzene	460-00-4			70-130	96
Toluene-d8	2037-26-5			70-130	94

Air Toxics

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Lab ID:         1903098           Date/Time Collected:         2/27/19 (Collected)		Date/Time A Dilution Fac Instrument/F	tor:	3/7/19 08:10 PM 1.60 msd22.i / 22030712	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit ) (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	0.12	0.32	0.63	Not Detected
1,4-Dioxane	123-91-1	0.13	0.29	0.58	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.14	0.32	0.63	Not Detected
Tetrachloroethene	127-18-4	0.066	0.54	1.1	Not Detected
trans-1,2-Dichloroethene	156-60-5	0.10	0.32	0.63	Not Detected
Trichloroethene	79-01-6	0.093	0.43	0.86	Not Detected
Vinyl Chloride	75-01-4	0.058	0.20	0.41	Not Detected
D: Analyte not within the DoD s	cope of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	105
4-Bromofluorobenzene	460-00-4			70-130	95
Toluene-d8	2037-26-5			70-130	94

Air Toxics

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Lab ID:         1903098-           Date/Time Collected:         2/27/19 0		Date/Time A Dilution Fac Instrument/F	tor:	3/7/19 08:45 PM 1.54 msd22.i / 22030713	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit ) (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	0.12	0.30	0.61	Not Detected
1,4-Dioxane	123-91-1	0.13	0.28	0.55	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.14	0.30	0.61	Not Detected
Tetrachloroethene	127-18-4	0.063	0.52	1.0	Not Detected
trans-1,2-Dichloroethene	156-60-5	0.096	0.30	0.61	Not Detected
Trichloroethene	79-01-6	0.089	0.41	0.83	Not Detected
Vinyl Chloride	75-01-4	0.056	0.20	0.39	Not Detected
D: Analyte not within the DoD s	cope of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	106
4-Bromofluorobenzene	460-00-4			70-130	94
Toluene-d8	2037-26-5			70-130	96

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**Air Toxics** 

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Ford LTP **Client ID:** 

Lab ID:

Media:

Lab Blank 1903098-05A

Date/Time Collected: NA - Not Applicable

NA - Not Applicable

Date/Time Analyzed: **Dilution Factor:** Instrument/Filena

name: msd22.i / 22030706a

3/7/19 03:27 PM

		MDL	LOD	Rpt. Limit	Amount
Compound	CAS#	(ug/m3)	(ug/m3)	(ug/m3)	(ug/m3)
1,1-Dichloroethene	75-35-4	0.075	0.20	0.40	Not Detected
1,4-Dioxane	123-91-1	0.084	0.18	0.36	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.088	0.20	0.40	Not Detected
Tetrachloroethene	127-18-4	0.041	0.34	0.68	Not Detected
trans-1,2-Dichloroethene	156-60-5	0.062	0.20	0.40	Not Detected
Trichloroethene	79-01-6	0.058	0.27	0.54	Not Detected
Vinyl Chloride	75-01-4	0.036	0.13	0.26	Not Detected

D: Analyte not within the DoD scope of accreditation.

Surrogates	CAS#	Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0	70-130	103
4-Bromofluorobenzene	460-00-4	70-130	98
Toluene-d8	2037-26-5	70-130	94

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Ford LTP

Client ID:	CCV		
Lab ID:	1903098-06A	Date/Time Analyzed:	3/7/19 11:29 AM
Date/Time Collected:	NA - Not Applicable	Dilution Factor:	1.00
Media:	NA - Not Applicable	Instrument/Filename:	msd22.i / 22030702

Compound	CAS#	%Recovery
1,1-Dichloroethene	75-35-4	105
1,4-Dioxane	123-91-1	110
cis-1,2-Dichloroethene	156-59-2	105
Tetrachloroethene	127-18-4	94
trans-1,2-Dichloroethene	156-60-5	102
Trichloroethene	79-01-6	96
Vinyl Chloride	75-01-4	105

D: Analyte not within the DoD scope of accreditation.

Surrogates	CAS#	Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0	70-130	97
4-Bromofluorobenzene	460-00-4	70-130	99
Toluene-d8	2037-26-5	70-130	101

Air Toxics

**Air Toxics** 

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Ford LTP

Client ID:	LCS		
Lab ID:	1903098-07A	Date/Time Analyzed:	3/7/19 12:20 PM
Date/Time Collected:	NA - Not Applicable	Dilution Factor:	1.00
Media:	NA - Not Applicable	Instrument/Filename:	msd22.i / 22030703

Compound	CAS#	%Recovery
1,1-Dichloroethene	75-35-4	113
1,4-Dioxane	123-91-1	121
cis-1,2-Dichloroethene	156-59-2	125
Tetrachloroethene	127-18-4	105
trans-1,2-Dichloroethene	156-60-5	97
Trichloroethene	79-01-6	103
Vinyl Chloride	75-01-4	118

D: Analyte not within the DoD scope of accreditation.

Surrogates	CAS#	Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0	70-130	98
4-Bromofluorobenzene	460-00-4	70-130	101
Toluene-d8	2037-26-5	70-130	103

\* % Recovery is calculated using unrounded analytical results.

**Air Toxics** 

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Ford LTP

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Client ID:	LCSD		
Lab ID:	1903098-07AA	Date/Time Analyzed:	3/7/19 01:38 PM
Date/Time Collected:	NA - Not Applicable	Dilution Factor:	1.00
Media:	NA - Not Applicable	Instrument/Filename:	msd22.i / 22030704

Compound	CAS#	%Recovery
1,1-Dichloroethene	75-35-4	111
1,4-Dioxane	123-91-1	121
cis-1,2-Dichloroethene	156-59-2	122
Tetrachloroethene	127-18-4	104
trans-1,2-Dichloroethene	156-60-5	95
Trichloroethene	79-01-6	100
Vinyl Chloride	75-01-4	115

D: Analyte not within the DoD scope of accreditation.

Surrogates	CAS#	Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0	70-130	97
4-Bromofluorobenzene	460-00-4	70-130	100
Toluene-d8	2037-26-5	70-130	104

March 11, 2019



Kris Hinskey Arcadis Inc 10559 Citation Ave Suite 100 Brighton, MI 48116

CADENA project ID: E203631 Project: Ford Livonia Transmission Project - OFF-SITE - Soil Gas and Groundwater Project number: MI001454.0002/3/4.00002/2B/3B Client project scope reference: Sample COC only was used to define project analytical requirements. Laboratory: Eurofins Air Toxics - Folsom Laboratory submittal: 1903098 Sample date: 2019-02-27 Report received by CADENA: 2019-03-11 Initial Data Verification completed by CADENA: 2019-03-11

4 Air samples were analyzed for TO-15 parameters.

There were no significant QC anomalies or exceptions to report.

Data verification for the report specified above was completed using the Ford Motor Company Environmental Laboratory Technical Specification, the CADENA Standard Operating Procedure for the Verification of Environmental Analytical Data and the associated analytical methods as references for evaluating the batch QC, sample data and report content. The EPA National Functional Guidelines for validating organic and inorganic data were used as guidance when addressing out of control QC results and the associated data qualifiers.

Analytical results reported between RDL and MDL are flagged 'J' and considered estimated values.

The definitions of the qualifiers used for this data package are defined in the analytical report. CADENA valid qualifiers are defined in the table below. To view and download a PDF copy of the laboratory analytical report access the CADENA CLMS at <a href="http://clms.cadenaco.com/index.cfm">http://clms.cadenaco.com/index.cfm</a>.

Please contact me if you have any questions.

Sincerely,

Jim Tomalia

Project Scientist

CADENA Inc, 1099 Highland Drive, Suite E, Ann Arbor, MI 48108 517-819-0356

### **CADENA Valid Qualifiers**

Valid Qualifiers	Description
<	Less than the reported concentration.
>	Greater than the reported concentration.
В	The analyte / compound was detected in the associated blank. For Organic methods the sample concentration was greater than the RDL and less than 5x (or 10x for common lab contaminates) the blank concentration and is considered non-detect at the reported concentration. For Inorganic methods the sample concentration was greater than the RDL and less than 10x the blank concentration and is considered non-detect at the reported concentration.
Е	The analyte / Compound reported exceeds the calibration range and is considered estimated.
EMPC	Estimated Minimum Potential Contamination - Dioxin/Furan analyses only.
J	Indicates an estimated value. This flag is used either when estimating a concentration for a tentatively identified compound or when the data indicates the presence of an analyte / compound but the result is less than the sample Quantitation limit, but greater than zero. The flag is also used in data validation to indicate a reported value should be considered estimated due to associated quality assurance deficiencies.
J-	The result is an estimated quantity, but the result may be biased low.
JB	NON-DETECT AT THE CONCENTRATION REPORTED AND ESTIMATED
JH	The sample result is considered estimated and is potentially biased high.
JL	The sample result is considered estimated and is potentially biased low.
JUB	NON-DETECT AT THE REPORTING LIMIT AND ESTIMATED
NJ	Tentatively identified compound with approximated concentration.
R	Indicates the value is considered to be unusable. (Note: The analyte / compound may or may not be present.)
TNTC	Too Numerous to Count - Asbestos and Microbiological Results.
U	Indicates that the analyte / compound was analyzed for, but not detected.
UB	The analyte / compound was detected in the associated blank. For Organic methods the sample concentration was less than the RDL and less than $5x$ (or $10x$ for common lab contaminates) the blank concentration and is considered non-detect at the RDL. For Inorganic methods the sample concentration was less than the RDL and less than $10x$ the blank concentration and is considered non-detect at the RDL.
UJ	The analyte / compound was not detected above the reported sample Quantitation limit. However, the Quantitation limit is considered to be approximate due to associated quality assurance results and may or may not represent the actual limit of Quantitation to accurately and precisely report the analyte in the sample.



### Ford Motor Company – Livonia Transmission Project

# **DATA REVIEW**

### Livonia, Michigan

Volatile Organic Compounds (VOC) TO-15 Analysis

SDG #1903098 CADENA Verification Report: 2019-03-11

Analyses Performed By: Eurofins Air Toxics Folsom, California

Report #32118R Review Level: Tier III Project: MI001454.0003.00002

### SUMMARY

This data quality assessment summarizes the review of Sample Delivery Group (SDG) # 1903098 for samples collected in association with the Ford – Livonia, Michigan site. The review was conducted as a Tier III validation in addition to a verification/Tier II validation review performed by CADENA Inc. and included review of level IV laboratory data package completeness. Only elements of a Tier III validation effort (Tier III includes a detailed review of laboratory raw data to check for errors in calculation, calibration review, internal standard review and compound identification) and omitted deviations from the CADENA verification/Tier II report are documented in this report. Only analytical data associated with constituents of concern were reviewed for this validation. Field documentation was not included in this review. Included with this assessment are the validation annotated sample result sheets, and chain of custody. Analyses were performed on the following samples:

				Sample		Analysis		
SDG	Sample ID	Lab ID	Matrix	Collection Date	Parent Sample	TO-15 (Full Scan)	TO-15 (SIM)	MISC
1903098	AA-12087STARK- 01_022619	1903098-01A	Air	2/27/2019		x		
	IAF-12087STARK- 01_022619	1903098-02A	Air	2/27/2019		х		
	IAG-12087STARK- 03_022619	1903098-03A	Air	2/27/2019		х		
	IAG-12087STARK- 04_022619	1903098-04A	Air	2/27/2019		x		

#### ANALYTICAL DATA PACKAGE DOCUMENTATION

The table below is the evaluation of the data package completeness.

		Reported		Performance Acceptable		Not
Item	s Reviewed	No	Yes	No	Yes	Required
1. Sample receipt condition	1		Х		Х	
2. Requested analyses and	sample results		Х		Х	
3. Master tracking list			Х		Х	
4. Methods of analysis			Х		Х	
5. Reporting limits			Х		Х	
6. Sample collection date			Х		Х	
7. Laboratory sample recei	ved date		Х		Х	
8. Sample preservation ve	ification (as applicable)		Х		Х	
9. Sample preparation/extr	action/analysis dates		Х		Х	
10. Fully executed Chain-of-	Custody (COC) form		Х		Х	
11. Narrative summary of Q problems provided	uality Assurance or sample		х		Х	
12. Data Package Complete	ness and Compliance		Х		Х	

#### **DATA REVIEW**

#### **ORGANIC ANALYSIS INTRODUCTION**

Analyses were performed according to United States Environmental Protection Agency (USEPA) Method TO-15 (Full Scan). Data were reviewed in accordance with USEPA National Functional Guidelines of October 1999.

The data review process is an evaluation of data on a technical basis rather than a determination of contract compliance. As such, the standards against which the data are being weighed may differ from those specified in the analytical method. It is assumed that the data package represents the best efforts of the laboratory and had already been subjected to adequate and sufficient quality review prior to submission.

During the review process, laboratory qualified and unqualified data are verified against the supporting documentation. Based on this evaluation, qualifier codes may be added, deleted, or modified by the data reviewer. Results are qualified with the following codes in accordance with USEPA National Functional Guidelines:

- Concentration (C) Qualifiers
  - U The analyte was analyzed for but was not detected above the level of the reported sample quantitation limit.
  - B The compound has been found in the sample as well as its associated blank, its presence in the sample may be suspect.
- Quantitation (Q) Qualifiers
  - E The compound was quantitated above the calibration range.
  - D Concentration is based on a diluted sample analysis.
- Validation Qualifiers
  - J The result is an estimated quantity. The associated numerical value is the approximate concentration of the analyte in the sample.
  - UJ The analyte was analyzed for but was not detected. The reported quantitation limit is approximate and may be inaccurate or imprecise.
  - J+ The result is an estimated quantity, but the result may be biased high.
  - J- The result is an estimated quantity, but the result may be biased low.
  - UB Analyte considered non-detect at the listed value due to associated blank contamination.
  - N The analysis indicates the presence of a compound for which there is presumptive evidence to make a tentative identification.
  - R The sample results are rejected.

Two facts should be noted by all data users. First, the "R" flag means that the associated value is unusable. In other words, due to significant quality control (QC) problems, the analysis is invalid and provides no information as to whether the compound is present or not. "R" values should not appear on data tables because they cannot be relied upon, even as a last resort. The second fact to keep in mind is that no compound concentration, even if it has passed all QC tests, is guaranteed to be accurate. Strict QC serves to increase confidence in data but any value potentially contains error.

#### VOLATILE ORGANIC COMPOUND (VOC) ANALYSES

#### 1. Holding Times

The specified holding times for the following methods are presented in the following table.

Method	Matrix	Holding Time	Preservation	Return Canister Pressure
USEPA TO-15	Air	30 days from collection to analysis (Canister)	Ambient Temperature	< -2" Hg

All samples were analyzed within the specified holding time and canister return pressure / vacuum criteria.

#### 2. Mass Spectrometer Tuning

Mass spectrometer performance was acceptable and all analyses were performed within a 12-hour tune clock.

System performance and column resolution were acceptable.

#### 3. Calibration

Satisfactory instrument calibration is established to ensure that the instrument is capable of producing acceptable quantitative data. An initial calibration demonstrates that the instrument is capable of acceptable performance at the beginning of an experimental sequence. The continuing calibration verifies that the instrument daily performance is satisfactory.

#### 3.1 Initial Calibration

The method specifies percent relative standard deviation (%RSD) and relative response factor (RRF) limits for select compounds only. A technical review of the data applies limits to all compounds with no exceptions.

All target compounds associated with the initial calibration standards must exhibit a %RSD less than the control limit (30%) or a correlation coefficient greater than 0.99 and an RRF value greater than control limit (0.05).

All compounds associated with the initial calibrations were within the specified control limits.

#### 3.2 Continuing Calibration

All target compounds associated with the continuing calibration standard must exhibit a percent difference (%D) less than the control limit (30%) and RRF value greater than control limit (0.05).

All compounds associated with the continuing calibrations were within the specified control limits.

#### 4. Internal Standard Performance

Internal standard performance criteria insure that the GC/MS sensitivity and response are stable during every sample analysis. The criteria requires the internal standard compounds associated with the VOC exhibit area counts that are not greater than 140% or less than 60% of the area counts of the associated continuing calibration standard.

All internal standard responses were within control limits.

#### DATA REVIEW

#### 5. Compound Identification

Compounds are identified on the GC/MS by using the analytes relative retention time and ion spectra.

All identified compounds met the specified criteria.

#### 6. System Performance and Overall Assessment

Overall system performance was acceptable. Other than for those deviations specifically mentioned in this review, the overall data quality is within the guidelines specified in the method.

### DATA VALIDATION CHECKLIST FOR VOCs

VOCs: TO-15 ( Full Scan)	Re	eported		ormance eptable	Not
	No	Yes	No	Yes	Required
GAS CHROMATOGRAPHY/MASS SPECTROMET	'RY (GC/I	MS)			
Tier II Validation					
Canister return pressure (<-2"Hg)		Х		Х	
Tier III Validation		1			1
System performance and column resolution		X		X	
Initial calibration %RSDs		X		X	
Continuing calibration RRFs		X		X	
Continuing calibration %Ds		X		X	
Instrument tune and performance check		X		X	
Ion abundance criteria for each instrument used		X		X	
Internal standard		Х		X	
Compound identification and quantitation					
A. Reconstructed ion chromatograms		X		X	
B. Quantitation Reports		X		X	
C. RT of sample compounds within the established RT windows		x		X	
D. Transcription/calculation errors present		Х		X	
E. Reporting limits adjusted to reflect sample dilutions		Х		Х	

Notes:

%RSD Relative standard deviation

- %R Percent recovery
- RPD Relative percent difference

%D Percent difference

### VALIDATION PERFORMED BY: Joseph C. Houser

SIGNATURE:

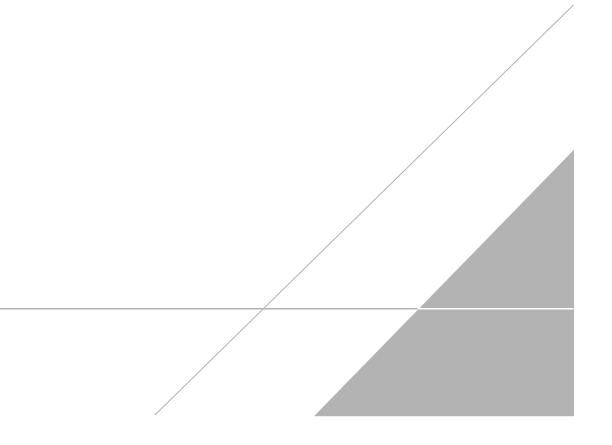
Jough c. House

DATE: March 21, 2019

PEER REVIEW: Dennis Capria

DATE: March 27, 2019

# CHAIN OF CUSTODY CORRECTED SAMPLE ANALYSIS DATA SHEETS



Air Toxics

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Client ID:         AA-12087Stark-01_022619           Lab ID:         1903098-01A           Date/Time Collected:         2/27/19 03:57 PM           Media:         6 Liter Summa Canister (100% Certified)		Date/Time A Dilution Fac Instrument/F	tor:	3/7/19 06:58 PM 1.66 msd22.i / 22030710	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	0.12	0.33	0.66	Not Detected
1,4-Dioxane	123-91-1	0.14	0.30	0.60	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.14	0.33	0.66	Not Detected
Tetrachloroethene	127-18-4	0.068	0.56	1.1	Not Detected
trans-1,2-Dichloroethene	156-60-5	0.10	0.33	0.66	Not Detected
Trichloroethene	79-01-6	0.096	0.45	0.89	Not Detected
Vinyl Chloride	75-01-4	0.060	0.21	0.42	Not Detected
D: Analyte not within the DoD sco	be of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	104
4-Bromofluorobenzene	460-00-4			70-130	98
Toluene-d8	2037-26-5			70-130	94

Air Toxics

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Lab ID: 19 Date/Time Collected: 2/	F-12087Stark-01_022619 903098-02A 27/19 04:02 PM Liter Summa Canister (100% Certified)	Date/Time A Dilution Fact Instrument/F	tor:	3/7/19 07:34 PM 1.66 msd22.i / 22030711	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit ) (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	0.12	0.33	0.66	Not Detected
1,4-Dioxane	123-91-1	0.14	0.30	0.60	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.14	0.33	0.66	Not Detected
Tetrachloroethene	127-18-4	0.068	0.56	1.1	Not Detected
trans-1,2-Dichloroethene	9 156-60-5	0.10	0.33	0.66	Not Detected
Trichloroethene	79-01-6	0.096	0.45	0.89	Not Detected
Vinyl Chloride	75-01-4	0.060	0.21	0.42	Not Detected
D: Analyte not within the	DoD scope of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	101
4-Bromofluorobenzene	460-00-4			70-130	96
Toluene-d8	2037-26-5			70-130	94

Air Toxics

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Lab ID:         1903098           Date/Time Collected:         2/27/19 (Collected)		Date/Time A Dilution Fac Instrument/F	tor:	3/7/19 08:10 PM 1.60 msd22.i / 22030712	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit ) (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	0.12	0.32	0.63	Not Detected
1,4-Dioxane	123-91-1	0.13	0.29	0.58	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.14	0.32	0.63	Not Detected
Tetrachloroethene	127-18-4	0.066	0.54	1.1	Not Detected
trans-1,2-Dichloroethene	156-60-5	0.10	0.32	0.63	Not Detected
Trichloroethene	79-01-6	0.093	0.43	0.86	Not Detected
Vinyl Chloride	75-01-4	0.058	0.20	0.41	Not Detected
D: Analyte not within the DoD s	cope of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	105
4-Bromofluorobenzene	460-00-4			70-130	95
Toluene-d8	2037-26-5			70-130	94

Air Toxics

#### MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Lab ID:         1903098-           Date/Time Collected:         2/27/19 0		Date/Time A Dilution Fac Instrument/F	tor:	3/7/19 08:45 PM 1.54 msd22.i / 22030713	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit ) (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	0.12	0.30	0.61	Not Detected
1,4-Dioxane	123-91-1	0.13	0.28	0.55	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.14	0.30	0.61	Not Detected
Tetrachloroethene	127-18-4	0.063	0.52	1.0	Not Detected
trans-1,2-Dichloroethene	156-60-5	0.096	0.30	0.61	Not Detected
Trichloroethene	79-01-6	0.089	0.41	0.83	Not Detected
Vinyl Chloride	75-01-4	0.056	0.20	0.39	Not Detected
D: Analyte not within the DoD s	cope of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	106
4-Bromofluorobenzene	460-00-4			70-130	94
Toluene-d8	2037-26-5			70-130	96

Phone	ue Ravine Rd. Suite B, Folsom, CA 9 (800) 985-5955;  Fax (916) 351-8279	PID: 5630	Workor	der #:		<u>190</u> 309	)8		<u>Caniste</u>	n <b>ks belo</b> r Samplir Shroud V	and the second sec	r:		
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-	Name: Ford LTP Manager: Kris Hinskey		DCE, tr	ans-1,2-DCE,	1,4-Dioxane	, PCE, TCÉ and	IVC. Submit				Turnarou			
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3/11/2019 Mr. Jim Tomalia Arcadis U.S., Inc. 28550 Cabot Dr. Suite 500 Novi MI 48377

Project Name: Ford LTP Project #: Workorder #: 1903094

Dear Mr. Jim Tomalia

The following report includes the data for the above referenced project for sample(s) received on 3/4/2019 at Air Toxics Ltd.

The data and associated QC analyzed by TO-15 are compliant with the project requirements or laboratory criteria with the exception of the deviations noted in the attached case narrative.

Thank you for choosing Eurofins Air Toxics Inc. for your air analysis needs. Eurofins Air Toxics Inc. is committed to providing accurate data of the highest quality. Please feel free to contact the Project Manager: Ausha Scott at 916-985-1000 if you have any questions regarding the data in this report.

Regards,

Scott

Ausha Scott Project Manager

A Eurofins Lancaster Laboratories Company

180 Blue Ravine Road, Suite B Folsom, CA 95630



#### WORK ORDER #: 1903094

#### Work Order Summary

CLIENT:	Mr. Jim Tomalia Arcadis U.S., Inc. 28550 Cabot Dr. Suite 500 Novi, MI 48377	BILL TO:	Accounts Payable Arcadis U.S., Inc. 630 Plaza Drive Suite 600 Highlands Ranch, CO 80129
PHONE:	517-819-0356	<b>P.O.</b> #	MI001454.0003
FAX:		PROJECT #	Ford LTP
DATE RECEIVED: DATE COMPLETED:	03/04/2019 03/11/2019	CONTACT:	Ausha Scott

			RECEIPT	FINAL
FRACTION #	NAME	<u>TEST</u>	VAC./PRES.	PRESSURE
01A	SSMP-12087Stark-01_022719	TO-15	2.0 "Hg	15 psi
02A	SSMP-12087Stark-02_022719	TO-15	6.0 "Hg	15 psi
03A	Lab Blank	TO-15	NA	NA
04A	CCV	TO-15	NA	NA
05A	LCS	TO-15	NA	NA
05AA	LCSD	TO-15	NA	NA

CERTIFIED BY:

Lai

03/11/19 DATE:

Technical Director

Certification numbers: AZ Licensure AZ0775, NJ NELAP - CA016, NY NELAP - 11291, TX NELAP - T104704434-15-9, UT NELAP CA0093332015-6, VA NELAP - 8113, WA NELAP - C935 Name of Accreditation Body: NELAP/ORELAP (Oregon Environmental Laboratory Accreditation Program) Accreditation number: CA300005, Effective date: 10/18/2015, Expiration date: 10/17/2016. Eurofins Air Toxics Inc.. certifies that the test results contained in this report meet all requirements of the NELAC standards

This report shall not be reproduced, except in full, without the written approval of Eurofins Air Toxics, Inc.

180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630 (916) 985-1000. (800) 985-5955. FAX (916) 985-1020



#### LABORATORY NARRATIVE EPA Method TO-15 Arcadis U.S., Inc. Workorder# 1903094

Two 1 Liter Summa Canister (100% Certified) samples were received on March 04, 2019. The laboratory performed analysis via EPA Method TO-15 using GC/MS in the full scan mode.

This workorder was independently validated prior to submittal using 'USEPA National Functional Guidelines' as generally applied to the analysis of volatile organic compounds in air. A rules-based, logic driven, independent validation engine was employed to assess completeness, evaluate pass/fail of relevant project quality control requirements and verification of all quantified amounts.

#### **Receiving Notes**

There were no receiving discrepancies.

#### **Analytical Notes**

As per client project requirements, the laboratory has reported estimated values for target compound hits that are below the Reporting Limit but greater than the Method Detection Limit. Concentrations that are below the level at which the canister was certified (0.2 ppbv for compounds reported at 0.5 ppbv and 0.8 ppbv for compounds reported at 2.0 ppbv) may be false positives.

### **Definition of Data Qualifying Flags**

Ten qualifiers may have been used on the data analysis sheets and indicates as follows:

B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).

- J Estimated value.
- E Exceeds instrument calibration range.
- S Saturated peak.
- Q Exceeds quality control limits.

U - Compound analyzed for but not detected above the reporting limit, LOD, or MDL value. See data page for project specific U-flag definition.

UJ- Non-detected compound associated with low bias in the CCV

- N The identification is based on presumptive evidence.
- M Reported value may be biased due to apparent matrix interferences.
- CN See Case Narrative.

File extensions may have been used on the data analysis sheets and indicates as follows:

a-File was requantified

b-File was quantified by a second column and detector

r1-File was requantified for the purpose of reissue

Air Toxics

#### EPA METHOD TO-15 GC/MS FULL SCAN

Lab ID:         1903           Date/Time Collected:         2/27	IP-12087Stark-01_022719 3094-01A /19 04:34 PM er Summa Canister (100% Certified)	Date/Time A Dilution Fact Instrument/F	tor: 2	/9/19 02:46 AM .16 isd3.i / 3030827	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	1.5	3.4	4.3	Not Detected
1,4-Dioxane	123-91-1	1.4	7.8	16	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.94	3.4	4.3	Not Detected
Tetrachloroethene	127-18-4	1.5	5.9	7.3	Not Detected
trans-1,2-Dichloroethene	156-60-5	1.3	3.4	4.3	Not Detected
Trichloroethene	79-01-6	0.93	4.6	5.8	Not Detected
Vinyl Chloride	75-01-4	1.5	2.2	2.8	Not Detected
D: Analyte not within the D	oD scope of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	91
4-Bromofluorobenzene	460-00-4			70-130	101
Toluene-d8	2037-26-5			70-130	102

**Air Toxics** 

#### EPA METHOD TO-15 GC/MS FULL SCAN

Lab ID: 19 Date/Time Collected: 2/2	MP-12087Stark-02_022719 03094-02A 27/19 04:31 PM .iter Summa Canister (100% Certified)	Date/Time A Dilution Fact Instrument/F	tor: 2	/9/19 03:31 AM .52 nsd3.i / 3030828	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	1.8	4.0	5.0	Not Detected
1,4-Dioxane	123-91-1	1.6	9.1	18	Not Detected
cis-1,2-Dichloroethene	156-59-2	1.1	4.0	5.0	Not Detected
Tetrachloroethene	127-18-4	1.7	6.8	8.5	Not Detected
trans-1,2-Dichloroethene	156-60-5	1.5	4.0	5.0	Not Detected
Trichloroethene	79-01-6	1.1	5.4	6.8	Not Detected
Vinyl Chloride	75-01-4	1.8	2.6	3.2	Not Detected
D: Analyte not within the	DoD scope of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	90
4-Bromofluorobenzene	460-00-4			70-130	100
Toluene-d8	2037-26-5			70-130	101

### **eurofins**

#### EPA METHOD TO-15 GC/MS FULL SCAN

Ford LTP **Client ID:** 

Lab ID:

Media:

Lab Blank 1903094-03A

Date/Time Collected: NA - Not Applicable

NA - Not Applicable

Date/Time Analyzed: 3/8/19 11:06 AM **Dilution Factor:** 1.00 Instrument/Filename:

msd3.i / 3030806c

		MDL	LOD	Rpt. Limit	Amount
Compound	CAS#	(ug/m3)	(ug/m3)	(ug/m3)	(ug/m3)
1,1-Dichloroethene	75-35-4	0.71	1.6	2.0	Not Detected
1,4-Dioxane	123-91-1	0.65	3.6	7.2	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.44	1.6	2.0	Not Detected
Tetrachloroethene	127-18-4	0.68	2.7	3.4	Not Detected
trans-1,2-Dichloroethene	156-60-5	0.59	1.6	2.0	Not Detected
Trichloroethene	79-01-6	0.43	2.1	2.7	Not Detected
Vinyl Chloride	75-01-4	0.72	1.0	1.3	Not Detected
D: Analyte not within the DoD scope	of accreditation.				

Surrogates	CAS#	Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0	70-130	88
4-Bromofluorobenzene	460-00-4	70-130	98
Toluene-d8	2037-26-5	70-130	102

**Air Toxics** 

# 🔅 eurofins

Air Toxics

### EPA METHOD TO-15 GC/MS FULL SCAN

#### Ford LTP

Client ID:	ссч		
Lab ID:	1903094-04A	Date/Time Analyzed:	3/8/19 09:02 AM
Date/Time Collected:	NA - Not Applicable	Dilution Factor:	1.00
Media:	NA - Not Applicable	Instrument/Filename:	msd3.i / 3030802

Compound	CAS#	%Recovery
1,1-Dichloroethene	75-35-4	102
1,4-Dioxane	123-91-1	98
cis-1,2-Dichloroethene	156-59-2	94
Tetrachloroethene	127-18-4	108
trans-1,2-Dichloroethene	156-60-5	103
Trichloroethene	79-01-6	99
Vinyl Chloride	75-01-4	104

D: Analyte not within the DoD scope of accreditation.

Surrogates	CAS#	Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0	70-130	85
4-Bromofluorobenzene	460-00-4	70-130	103
Toluene-d8	2037-26-5	70-130	101

**Air Toxics** 

### EPA METHOD TO-15 GC/MS FULL SCAN

#### Ford LTP

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Client ID:	LCS		
Lab ID:	1903094-05A	Date/Time Analyzed:	3/8/19 09:25 AM
Date/Time Collected:	NA - Not Applicable	Dilution Factor:	1.00
Media:	NA - Not Applicable	Instrument/Filename:	msd3.i / 3030803

Compound	CAS#	%Recovery
1,1-Dichloroethene	75-35-4	103
1,4-Dioxane	123-91-1	93
cis-1,2-Dichloroethene	156-59-2	103
Tetrachloroethene	127-18-4	106
trans-1,2-Dichloroethene	156-60-5	89
Trichloroethene	79-01-6	94
Vinyl Chloride	75-01-4	107

D: Analyte not within the DoD scope of accreditation.

Surrogates	CAS#	Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0	70-130	86
4-Bromofluorobenzene	460-00-4	70-130	103
Toluene-d8	2037-26-5	70-130	94

\* % Recovery is calculated using unrounded analytical results.

## 🛟 eurofins

**Air Toxics** 

### EPA METHOD TO-15 GC/MS FULL SCAN

#### Ford LTP

Client ID:	LCSD		
Lab ID:	1903094-05AA	Date/Time Analyzed:	3/8/19 09:48 AM
Date/Time Collected:	NA - Not Applicable	Dilution Factor:	1.00
Media:	NA - Not Applicable	Instrument/Filename:	msd3.i / 3030804

Compound	CAS#	%Recovery
1,1-Dichloroethene	75-35-4	104
1,4-Dioxane	123-91-1	97
cis-1,2-Dichloroethene	156-59-2	102
Tetrachloroethene	127-18-4	106
trans-1,2-Dichloroethene	156-60-5	89
Trichloroethene	79-01-6	99
Vinyl Chloride	75-01-4	107

D: Analyte not within the DoD scope of accreditation.

Surrogates	CAS#	Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0	70-130	87
4-Bromofluorobenzene	460-00-4	70-130	103
Toluene-d8	2037-26-5	70-130	98

\* % Recovery is calculated using unrounded analytical results.

March 11, 2019



Kris Hinskey Arcadis Inc 10559 Citation Ave Suite 100 Brighton, MI 48116

CADENA project ID: E203631 Project: Ford Livonia Transmission Project - OFF-SITE - Soil Gas and Groundwater Project number: MI001454.0002/3/4.00002/2B/3B Client project scope reference: Sample COC only was used to define project analytical requirements. Laboratory: Eurofins Air Toxics - Folsom Laboratory submittal: 1903094 Sample date: 2019-02-27 Report received by CADENA: 2019-03-11 Initial Data Verification completed by CADENA: 2019-03-11

2 Air samples were analyzed for TO-15 parameters.

There were no significant QC anomalies or exceptions to report.

Data verification for the report specified above was completed using the Ford Motor Company Environmental Laboratory Technical Specification, the CADENA Standard Operating Procedure for the Verification of Environmental Analytical Data and the associated analytical methods as references for evaluating the batch QC, sample data and report content. The EPA National Functional Guidelines for validating organic and inorganic data were used as guidance when addressing out of control QC results and the associated data qualifiers.

Analytical results reported between RDL and MDL are flagged 'J' and considered estimated values.

The definitions of the qualifiers used for this data package are defined in the analytical report. CADENA valid qualifiers are defined in the table below. To view and download a PDF copy of the laboratory analytical report access the CADENA CLMS at <a href="http://clms.cadenaco.com/index.cfm">http://clms.cadenaco.com/index.cfm</a>.

Please contact me if you have any questions.

Sincerely,

Jim Tomalia

Project Scientist

CADENA Inc, 1099 Highland Drive, Suite E, Ann Arbor, MI 48108 517-819-0356

### **CADENA Valid Qualifiers**

Valid Qualifiers	Description
<	Less than the reported concentration.
>	Greater than the reported concentration.
В	The analyte / compound was detected in the associated blank. For Organic methods the sample concentration was greater than the RDL and less than $5x$ (or $10x$ for common lab contaminates) the blank concentration and is considered non-detect at the reported concentration. For Inorganic methods the sample concentration was greater than the RDL and less than $10x$ the blank concentration and is considered non-detect at the reported concentration.
Е	The analyte / Compound reported exceeds the calibration range and is considered estimated.
EMPC	Estimated Minimum Potential Contamination - Dioxin/Furan analyses only.
J	Indicates an estimated value. This flag is used either when estimating a concentration for a tentatively identified compound or when the data indicates the presence of an analyte / compound but the result is less than the sample Quantitation limit, but greater than zero. The flag is also used in data validation to indicate a reported value should be considered estimated due to associated quality assurance deficiencies.
J-	The result is an estimated quantity, but the result may be biased low.
JB	NON-DETECT AT THE CONCENTRATION REPORTED AND ESTIMATED
JH	The sample result is considered estimated and is potentially biased high.
JL	The sample result is considered estimated and is potentially biased low.
JUB	NON-DETECT AT THE REPORTING LIMIT AND ESTIMATED
NJ	Tentatively identified compound with approximated concentration.
R	Indicates the value is considered to be unusable. (Note: The analyte / compound may or may not be present.)
TNTC	Too Numerous to Count - Asbestos and Microbiological Results.
U	Indicates that the analyte / compound was analyzed for, but not detected.
UB	The analyte / compound was detected in the associated blank. For Organic methods the sample concentration was less than the RDL and less than $5x$ (or $10x$ for common lab contaminates) the blank concentration and is considered non-detect at the RDL. For Inorganic methods the sample concentration was less than the RDL and less than $10x$ the blank concentration and is considered non-detect at the RDL.
UJ	The analyte / compound was not detected above the reported sample Quantitation limit. However, the Quantitation limit is considered to be approximate due to associated quality assurance results and may or may not represent the actual limit of Quantitation to accurately and precisely report the analyte in the sample.



### Ford Motor Company – Livonia Transmission Project

## **DATA REVIEW**

### Livonia, Michigan

Volatile Organic Compounds (VOC) TO-15 Analysis

SDG #1903094 CADENA Verification Report: 2019-03-11

Analyses Performed By: Eurofins Air Toxics Folsom, California

Report #32140R Review Level: Tier III Project: MI001454.0003.00002

### SUMMARY

This data quality assessment summarizes the review of Sample Delivery Group (SDG) # 1903094 for samples collected in association with the Ford – Livonia, Michigan site. The review was conducted as a Tier III validation in addition to a verification/Tier II validation review performed by CADENA Inc. and included review of level IV laboratory data package completeness. Only elements of a Tier III validation effort (Tier III includes a detailed review of laboratory raw data to check for errors in calculation, calibration review, internal standard review and compound identification) and omitted deviations from the CADENA verification/Tier II report are documented in this report. Only analytical data associated with constituents of concern were reviewed for this validation. Field documentation was not included in this review. Included with this assessment are the validation annotated sample result sheets, and chain of custody. Analyses were performed on the following samples:

				Sample		Analysis		
SDG	Sample ID	Lab ID	Matrix	Collection Date	Parent Sample	TO-15 (Full Scan)	TO-15 (SIM)	MISC
	SSMP-12087STARK- 01_022719	1903094-01A	Air	2/27/2019		х		
1903094	SSMP-12087STARK- 02_022719	1903094-02A	Air	2/27/2019		Х		

#### ANALYTICAL DATA PACKAGE DOCUMENTATION

The table below is the evaluation of the data package completeness.

		Reported		Performance Acceptable		Not
Items	s Reviewed	No	Yes	No	Yes	Required
1. Sample receipt condition			Х		Х	
2. Requested analyses and	sample results		Х		Х	
3. Master tracking list			Х		Х	
4. Methods of analysis			Х		Х	
5. Reporting limits			Х		Х	
6. Sample collection date			Х		Х	
7. Laboratory sample receiv	ved date		Х		Х	
8. Sample preservation ver	fication (as applicable)		Х		Х	
9. Sample preparation/extra	action/analysis dates		Х		Х	
10. Fully executed Chain-of-	Custody (COC) form		Х		Х	
11. Narrative summary of Quproblems provided	ality Assurance or sample		х		Х	
12. Data Package Complete	ness and Compliance		Х		Х	

#### **DATA REVIEW**

#### **ORGANIC ANALYSIS INTRODUCTION**

Analyses were performed according to United States Environmental Protection Agency (USEPA) Method TO-15 (Full Scan). Data were reviewed in accordance with USEPA National Functional Guidelines of October 1999.

The data review process is an evaluation of data on a technical basis rather than a determination of contract compliance. As such, the standards against which the data are being weighed may differ from those specified in the analytical method. It is assumed that the data package represents the best efforts of the laboratory and had already been subjected to adequate and sufficient quality review prior to submission.

During the review process, laboratory qualified and unqualified data are verified against the supporting documentation. Based on this evaluation, qualifier codes may be added, deleted, or modified by the data reviewer. Results are qualified with the following codes in accordance with USEPA National Functional Guidelines:

- Concentration (C) Qualifiers
  - U The analyte was analyzed for but was not detected above the level of the reported sample quantitation limit.
  - B The compound has been found in the sample as well as its associated blank, its presence in the sample may be suspect.
- Quantitation (Q) Qualifiers
  - E The compound was quantitated above the calibration range.
  - D Concentration is based on a diluted sample analysis.
- Validation Qualifiers
  - J The result is an estimated quantity. The associated numerical value is the approximate concentration of the analyte in the sample.
  - UJ The analyte was analyzed for but was not detected. The reported quantitation limit is approximate and may be inaccurate or imprecise.
  - J+ The result is an estimated quantity, but the result may be biased high.
  - J- The result is an estimated quantity, but the result may be biased low.
  - UB Analyte considered non-detect at the listed value due to associated blank contamination.
  - N The analysis indicates the presence of a compound for which there is presumptive evidence to make a tentative identification.
  - R The sample results are rejected.

Two facts should be noted by all data users. First, the "R" flag means that the associated value is unusable. In other words, due to significant quality control (QC) problems, the analysis is invalid and provides no information as to whether the compound is present or not. "R" values should not appear on data tables because they cannot be relied upon, even as a last resort. The second fact to keep in mind is that no compound concentration, even if it has passed all QC tests, is guaranteed to be accurate. Strict QC serves to increase confidence in data but any value potentially contains error.

#### VOLATILE ORGANIC COMPOUND (VOC) ANALYSES

#### 1. Holding Times

The specified holding times for the following methods are presented in the following table.

Method	Matrix	Holding Time	Preservation	Return Canister Pressure
USEPA TO-15	Air	30 days from collection to analysis (Canister)	Ambient Temperature	< -2" Hg

All samples were analyzed within the specified holding time and canister return pressure / vacuum criteria.

#### 2. Mass Spectrometer Tuning

Mass spectrometer performance was acceptable and all analyses were performed within a 12-hour tune clock.

System performance and column resolution were acceptable.

#### 3. Calibration

Satisfactory instrument calibration is established to ensure that the instrument is capable of producing acceptable quantitative data. An initial calibration demonstrates that the instrument is capable of acceptable performance at the beginning of an experimental sequence. The continuing calibration verifies that the instrument daily performance is satisfactory.

#### 3.1 Initial Calibration

The method specifies percent relative standard deviation (%RSD) and relative response factor (RRF) limits for select compounds only. A technical review of the data applies limits to all compounds with no exceptions.

All target compounds associated with the initial calibration standards must exhibit a %RSD less than the control limit (30%) or a correlation coefficient greater than 0.99 and an RRF value greater than control limit (0.05).

All compounds associated with the initial calibrations were within the specified control limits.

#### 3.2 Continuing Calibration

All target compounds associated with the continuing calibration standard must exhibit a percent difference (%D) less than the control limit (30%) and RRF value greater than control limit (0.05).

All compounds associated with the continuing calibrations were within the specified control limits.

#### 4. Internal Standard Performance

Internal standard performance criteria insure that the GC/MS sensitivity and response are stable during every sample analysis. The criteria requires the internal standard compounds associated with the VOC exhibit area counts that are not greater than 140% or less than 60% of the area counts of the associated continuing calibration standard.

All internal standard responses were within control limits.

#### DATA REVIEW

#### 5. Compound Identification

Compounds are identified on the GC/MS by using the analytes relative retention time and ion spectra.

All identified compounds met the specified criteria.

#### 6. System Performance and Overall Assessment

Overall system performance was acceptable. Other than for those deviations specifically mentioned in this review, the overall data quality is within the guidelines specified in the method.

#### DATA VALIDATION CHECKLIST FOR VOCs

VOCs: TO-15 ( Full Scan)	Re	Reported		Performance Acceptable	
	No	Yes	No	No Yes	
GAS CHROMATOGRAPHY/MASS SPECTROMET	'RY (GC/I	MS)			
Tier II Validation					
Canister return pressure (<-2"Hg)		Х		Х	
Tier III Validation		1			1
System performance and column resolution		X		X	
Initial calibration %RSDs		X		X	
Continuing calibration RRFs		X		X	
Continuing calibration %Ds		X		X	
Instrument tune and performance check		Х		X	
Ion abundance criteria for each instrument used		Х		X	
Internal standard		X		X	
Compound identification and quantitation					
A. Reconstructed ion chromatograms		X		X	
B. Quantitation Reports		X		X	
C. RT of sample compounds within the established RT windows		x		X	
D. Transcription/calculation errors present		X		X	
E. Reporting limits adjusted to reflect sample dilutions		Х		Х	

Notes:

%RSD Relative standard deviation

- %R Percent recovery
- RPD Relative percent difference

%D Percent difference

### VALIDATION PERFORMED BY: Joseph C. Houser

SIGNATURE:

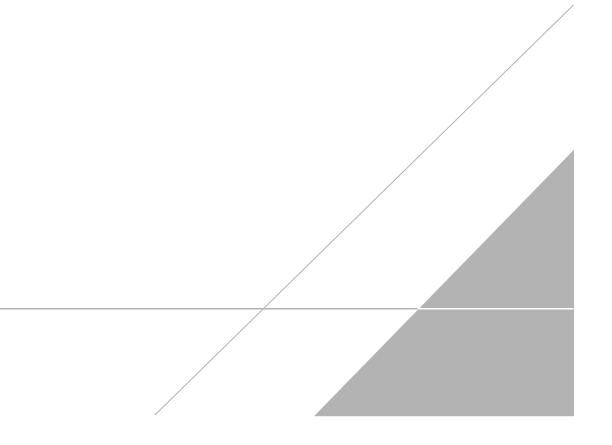
Jough c. House

DATE: March 21, 2019

PEER REVIEW: Dennis Capria

DATE: March 27, 2019

# CHAIN OF CUSTODY CORRECTED SAMPLE ANALYSIS DATA SHEETS



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Air Toxics

#### EPA METHOD TO-15 GC/MS FULL SCAN

Ford LTP

Lab ID:         1903           Date/Time Collected:         2/27	IP-12087Stark-01_022719 3094-01A /19 04:34 PM er Summa Canister (100% Certified)	Dilution Factor: 2.		3/9/19 02:46 AM 2.16 msd3.i / 3030827	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	1.5	3.4	4.3	Not Detected
1,4-Dioxane	123-91-1	1.4	7.8	16	Not Detected
cis-1,2-Dichloroethene	156-59-2	0.94	3.4	4.3	Not Detected
Tetrachloroethene	127-18-4	1.5	5.9	7.3	Not Detected
trans-1,2-Dichloroethene	156-60-5	1.3	3.4	4.3	Not Detected
Trichloroethene	79-01-6	0.93	4.6	5.8	Not Detected
Vinyl Chloride	75-01-4	1.5	2.2	2.8	Not Detected
D: Analyte not within the D	oD scope of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	91
4-Bromofluorobenzene	460-00-4			70-130	101
Toluene-d8	2037-26-5			70-130	102

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**Air Toxics** 

#### EPA METHOD TO-15 GC/MS FULL SCAN

Ford LTP

Lab ID: 19 Date/Time Collected: 2/2	MP-12087Stark-02_022719 03094-02A 27/19 04:31 PM .iter Summa Canister (100% Certified)	Dilution Factor: 2.52		3/9/19 03:31 AM 2.52 msd3.i / 3030828	
Compound	CAS#	MDL (ug/m3)	LOD (ug/m3)	Rpt. Limit (ug/m3)	Amount (ug/m3)
1,1-Dichloroethene	75-35-4	1.8	4.0	5.0	Not Detected
1,4-Dioxane	123-91-1	1.6	9.1	18	Not Detected
cis-1,2-Dichloroethene	156-59-2	1.1	4.0	5.0	Not Detected
Tetrachloroethene	127-18-4	1.7	6.8	8.5	Not Detected
trans-1,2-Dichloroethene	156-60-5	1.5	4.0	5.0	Not Detected
Trichloroethene	79-01-6	1.1	5.4	6.8	Not Detected
Vinyl Chloride	75-01-4	1.8	2.6	3.2	Not Detected
D: Analyte not within the	DoD scope of accreditation.				
Surrogates	CAS#			Limits	%Recovery
1,2-Dichloroethane-d4	17060-07-0			70-130	90
4-Bromofluorobenzene	460-00-4			70-130	100
Toluene-d8	2037-26-5			70-130	101

#### Analysis Request /Canister Chain of Custody For Laboratory Use Only 1903094 PID: Workorder #: Click links below to view: 180 Blue Ravine Rd. Suite B, Folsom, CA 95630 Canister Sampling Guide Phone (800) 985-5955; Fax (916) 351-8279 Helium Shroud Video Special Instructions/Notes: Report ONLY: 1,1-DCE; cis-1,2-Ford PID: NA Turnaround Time (Rush surcharges may apply) Project Name: Ford LTP 5 Day Turnaround Time DCE, trans-1,2-DCE, 1,4-Dioxane, PCE, TCE and VC. Project Manager: Kris Hinskey P.O.# MI001454.0003 Canister Vacuum/Pressure **Requested Analyses** Submit results through Cadena at jim.tomalia@cadena.com. Sampler: STURNEY, H. Ladd Lab Use Only Instructions/Notes) Site Name: 12087 Stark TO-15 (See Special Cadena #E203631. Level IV Reporting Final (psig) Gas: N<sub>2</sub> / He Initial (in Hg) Final (in Hg) Start Sampling Stop Sampling Receipt Flow Sample Identification Information Information Can # Controller # Date Time Date Time SSMP-12087Stark-01\_022719 12760 2425 634 -5 2/27/19 2/27/19 62 -29 SSMP-12087Stark-02\_022719 112293 2/27/19 2/27/19 24236 1622 -5 29 163 85MP-12087Stark=03---51-Relinquished by: (Signature/Affiliation) Received by: (Signature/Affiliation) Time Date 3/04/19 Date Time -18-19 Anderlicher Arcalin 0915 21-20 Relinduished by: (Signature/Affiliation) Date Time Received by: (Signature/Affiliation) Date Time Relinguished by: (Signature/Affiliation) Date Time Received by: (Signature/Affiliation) Date Time

Client:

Lab

ID

DIA

Shipper Name:

Sample Transportation Notice: Relinquishing signature on this document indicates that samples are shipped in compliance with all applicable local, State, Federal, and international laws, regulations, and ordinances of any kind. Relinquishing signature also indicates agreement to hold harmless, defend, and indemnify Eurofins Air Toxics against any claim, demand, or action, of any kind, related to the collection, handling, of shipping of samples. D.O.T Hotline (800) 467-4922

None

Lab Use Only

No

Yes

Custody Seals Intact?