

Fredrick R. Stater Plant Manager (702) 651-2233 Fax (702) 651-2310 Rick.Stater@tronox.com

April 27, 2009

Compliance Coordinator Nevada Division of Environmental Protection 901 South Stewart Street, Suite 4001 Carson City, NV 89701-5249

SUBJECT: First Quarter 2009 DMR – Permit # NEV2001516

Tronox LLC (Tronox) maintains a Permit # NEV2001516 covering synthetically lined pond operation in Henderson, Nevada. While there was no discharge to receiving waters from the covered ponds, the attached Discharge Monitoring Reports, DMR's, (Attachment 1) and accompanying tables provide operational information.

During the first part of this quarter, the automatic leak collection sump pump in WC-East Pond recorded gradual increases in collection rates, as the level in pond increased. Later in the quarter, as the level in WC-East dropped, a noted decrease in the leak collection rate was recorded. Based on semi-monthly data, the maximum collection rate recorded was 0.78 gpm (16,759 gals. over semi-monthly period, see Table 2b.).

Having a level indication in the leak collection sump along with pump flow meter is proving helpful for monitoring and identifying possible leaks between the primary and secondary liners. Preliminary data collected indicates the bottom of the pond does not have any leaks but leakage is suspected in a few areas along the sloped pond banks. The suspected areas have been noted, a pond liner repair company has been contacted and repairs have been tentatively scheduled for this fall, when the pond level is below the level where initial leakage was detected.

Should you have any questions concerning this report, please contact Mike Skromyda at (702) 651-2228 or michael.skromyda@tronox.com . Thank you.

Sincerely,

Fredrick R. Stater Plant Manager

Overnight Mail

cc: Mike Skromyda John Hatmaker

ATTACHMENT 1

Discharge Monitoring Reports

January 2009

February 2009

March 2009

AREA CODE NUMBER YEAR MO DAY
Forms by WindowChem(707)864-0845;p/n11090;v5.01;4/1/96

09 | 04 | 27

702-651-2200

SIGNATURE OF PRINCIPAL EXECUTIVE

OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

NEV2001516 PERMIT NUMBER

ADDRESS: PO BOX 55 HENDERSON, NV 89009-7000

Tronox LLC

NAME:

PERMITTEE NAME/ADDRESS:

LOCATION: Henderson, NV Attn: Fredrick R. Stater

FACILITY: Tronox LLC

DISCHARGE NUMBER

NOTE: Read instructions before completing this form

NO DISCHARGE

31

01

60

0

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60

FROM

MONITORING PERIOD

Discrete Discrete Calculation Calculation SAMPLE Meter TYPE Flow DATE FREQUENCY Monthly Bi-Monthly Monthly Bi-Monthly Bi-Monthly ANALYSIS Š X TELEPHONE 0 0 0 0 LIND 30 Day Ave (lb/dav) QUALITY OR CONCENTRATION 7 Day Ave (mg/l) Please see attached Table 2 Please see attached Table 1 Please see attached Table 1 Please see attached Table 1 Monitor and Report Monitor and Report Monitor and Report Monitor and Report 30 Day Ave (mg/l) I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OF REPRESENDED AND SERVICE OF REPRESENDED TO ASSESS THE PRESENDENT OF ACCORDANCE WHIT AS TENDED UNDER THE DISCOUNTED DESCRIPTION OF ACCORDANCE WITH OUT AND ASSESSED OF ANY INQUIRY OF THE PRESEND OR PRESENDENT OF REPRESENDENT OF REPRESENDENT OF ASSESSED OF ASSESSE UNITS MGD Please see attached Table 1 QUANTITY OR LOADING MAXIMUM Monitor and Report AVERAGE PERMIT REQUIREMENT PERMIT REQUIREMENT PERMIT REQUIREMENT MEASUREMENT MEASUREMENT SAMPLE MEASUREMENT MEASUREMENT SAMPLE MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT PERMIT REQUIREMENT REQUIREMENT REQUIREMENT SAMPLE NAME / TITLE PRINCIPAL EXECUTIVE OFFICER Leak Detection Information Water Balance Information Fredrick R. Stater **PARAMETER** Pond Water Level Storage Volume Influent Flow

COMMENT AND EXPLANATION OF ANY VIOLATIONS TYPED OR PRINTED

Facilty Ponds

Plant Manager

(Reference all attachments here)

00044/961223-180

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

NEV2001516 PERMIT NUMBER

NAME: Tronox E.S. ADDRESS: PO BOX 55 HENDERSON, NV 89009-7000

PERMITTEE NAME/ADDRESS:

001 DISCHARGE NUMBER

FACILITY: Tronox LLC				MONIT	MONITORING PERIOD	0					
LOCATION: Henderson, NV			FROM 09	02 01	TO 09	02 28	NO DISCHARGE	HARGE	×		
Attn: Fredrick R. Stater							NOTE: Read instructions before completing this form.	ons before c	ompleti	ng this form.	
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		AVERAGE	MAXIMUM	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave (Ib/dav)	TINO	X	OF ANALYSIS	TYPE
Flow	SAMPLE MEASUREMENT	Please see attached	tached Table 1	MGD					0	Monthly	Flow Meter
Influent	PERMIT REQUIREMENT	Monitor and Re	and Report			ļ	-	251222222			
Leak Detection Information	SAMPLE MEASUREMENT				Please see att	attached Table 2			0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT				Monitora	Monitor and Report					
Pond Water Level	SAMPLE MEASUREMENT				Please see attached Table	ached Table 1			0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT				Monitora	Monitor and Report					
Storage Volume	SAMPLE MEASUREMENT				Please see attached Table	ached Table 1			0	Bi-Monthly (Calculation
	PERMIT REQUIREMENT				Monitor a	Wonitor and Report					
Water Balance Information	SAMPLE MEASUREMENT				Please see attached Table	ached Table 1			0	Monthly	Calculation
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COMMENT AND EXPLANATION OF ANY VIOLATIONS TYPED OR PRINTED Facilty Ponds

(Reference all attachments here)

00044/961223-1801

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

NEV2001516 PERMIT NUMBER

001 DISCHARGE NUMBER

ADDRESS: PO BOX 55 HENDERSON, NV 89009-7000

Tronox LLC

NAME:

PERMITTEE NAME/ADDRESS:

LOCATION: Henderson, NV

FACILITY: Tronox LLC

NO DISCHARGE

Discrete Discrete Calculation Calculation AREA CODE NUMBER YEAR MO DAY
Forms by WindowChem(707)864-0845;p/n11090;v5.01;4/1/96 SAMPLE Meter TYPE Flow 09 | 04 | 27 DATE NOTE: Read instructions before completing this form FREQUENCY Monthly Bi-Monthly Bi-Monthly Monthly Bi-Monthly ANALYSIS 702-651-2200 Š X 0 TELEPHONE 0 0 0 0 LIND 30 Day Ave (lb/dav) SIGNATURE OF PRINCIPAL EXECUTIVE QUALITY OR CONCENTRATION OFFICER OR AUTHORIZED AGENT 7 Day Ave (mg/l) Please see attached Table 2 Please see attached Table 1 Please see attached Table 1 Please see attached Table 1 Monitor and Report Monitor and Report Monitor and Report Monitor and Report 30 Day Ave (mg/l) I CERTIFY INDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED NASHE MY DIRECTION OF SUPERVINENT AND THAT AS STEAD AND ASSESSED TO ASSESSED THAT OF CHAIR THE DESCORMANCE WHO ANANGE THE AND EVALUATE THE INSORMANTON SHARITED BASID ON MY INQUIRT OF THE PRESON OF PRESONS WHO MANAGE THE STATEM, CHAIR THE INSORMANTON SHARITED BASID ON MY INQUIRT OF THE PRESON OF PRESONS WHO MANAGE THE STATEM, AND EXCEPTION. HE EXCEPTION. HE EXCEPTION. HE EXCEPTION THE PROPERTY OF THE AND PURPHENDEN. UNITS MGD Please see attached Table 1 QUANTITY OR LOADING MAXIMUM Monitor and Report AVERAGE SAMPLE MEASUREMENT PERMIT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT SAMPLE MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT PERMIT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT SAMPLE NAME / TITLE PRINCIPAL EXECUTIVE OFFICER Leak Detection Information Water Balance Information Fredrick R. Stater TYPED OR PRINTED Plant Manager Attn: Fredrick R. Stater **PARAMETER** Pond Water Level Storage Volume Influent Flow

COMMENT AND EXPLANATION OF ANY VIOLATIONS Facilty Ponds

(Reference all attachments here)

00044/961223-180

ATTACHMENT 2

Pond Monitoring Results

Table 1a - Mn-1 Pond Monitoring Information

Date Date	Flow Into Pond (MGD)	Storage Volume (thousand gallons)	Water Balance (thousand gallon)	Discharge from Pond (thousands gallons)
01/09/09	English States	1,763		and the second of the
01/23/09	0.000	1,763	119	0.0
02/13/09		1,763		
02/25/09	0.001	1,795	119	0.0
03/09/09	Base Shakibotaka	1,795	129 agaggaarug albadalah 2001	
03/18/09	0.000	1,763	263	0.0

Table 2a - Mn-1 Pond Leak Detection Monitoring

Date	Volume in Detection Well (gallons pumped)
01/09/09	0.0
01/23/09	0.0
02/13/09	0.0
02/25/09	0.0
03/09/09	0.0
03/18/09	0.0

Table 1b — WC East Pond Monitoring Information

Date	Flow Into Pond (MGD)	Storage Volume (thousand gallons)	Water Balance (thousand gallon)	Discharge from Pond (thousand gallons)
01/09/09		9,726		\$5,004,000,000,000,000,000,000,000,000
01/23/09	0.199	9,650	-857	0.0
02/13/09		9,325		
02/25/09	0.211	10,290	-682	0.0
03/09/09	\$ \$3200 BH BH	10,109		
03/18/09	0.165	9,827	-1,079	0.0

Table 2b - WC-East Pond Leak Detection Monitoring

Table 2b - WC-Last Folid Leak Detection Monitoring				
	Date	Volume in Detection Well (gallons pumped)		
01/01/09	thru 01/15/09	North – 13,848		
ŧ!	11	South 0.0		
01/16/09	thru 01/31/09	North – 16,759		
11	11	South 0.0		
02/01/09	thru 02/15/09	North – 11,176		
11	Ħ	South 0.0		
02/16/09	thru 02/28/09	North – 10,774		
11	‡ŧ	South - 0.0		
03/01/09	thru 03/15/09	North – 12,282		
ţı	11	South - 0.0		
03/16/09	thru 03/31/09	North – 1,813		
H	H	South - 0.0		

Note: The new leak detection sump pump (with level sensor) was installed on July 24, 2008. The sump level and pump rate are continuously monitored and recorded on a data logger.

Table 1c - WC-West Pond Monitoring Information

Date	Flow Into Pond (MGD)	Storage Volume (thousands gallons)	Water Balance (thousands gallon)	Discharge from Pond (Ihousand gallons)
01/09/09	acendre valorica	8,325		
01/23/09	0.009	8,365	103	0.0
02/13/09		8,505	and a feducial days	garan Pendengerandan dan Pendikan
02/25/09	0.011	8,525	72	0.0
03/09/09	tens de la la color	8,565		
03/18/09	0.014	8,545	117	0.0

Table 2c - WC-West Pond Leak Detection Monitoring

Table 26 VVO-VVC3(1 Glid Leak Betection Worldon)				
Date	Volume in Detection Well			
	(gallons pumped)			
01/09/09	North – 0.0			
01/09/09	South - 0.0			
01/23/09	North – 0.0			
01/23/09	South - 0.0			
02/13/09	North – 0.0			
02/13/09	South – 0.0			
02/25/09	North – 0.0			
02/25/09	South – 0.0			
03/09/09	North – 0.0			
03/09/09	South - 0.0			
03/18/09	North – 0.0			
03/18/09	South - 0.0			

Table 1d - AP-5 Pond Monitoring Information

Date Date	Flow Into Pond (MGD)	Storage Volume (thousand gallons)	Water Balance (thousand gallon)	Discharge from Pond (Ihousand gallons)
01/01/09	Boling Steel et and	712	eva sa sa sa gaza da sa	
01/15/09	0.002	670	121	0.0
02/02/09	ersanis aranga	712		resident contractions
02/15/09	0.000	741	129	0.0
03/03/09		741		
03/17/09	0.004	698	-59	0.0

Table 2d – AP-5 Pond Leak Detection Monitoring

Olia modit motootion motificatile
Volume in Detection Well
(gallons pumped)
0.0
0.0
0.0
0.0
0.0
0.0