

# ENVIRON

January 23, 2012

Compliance Coordinator  
State of Nevada Division of Environmental Protection  
Bureau of Water Pollution Control  
901 South Stewart Street, Suite 4001  
Carson City, Nevada 89701-5249

Subject: Permit NEV2001515 Discharge Monitoring Reports – 4<sup>th</sup> Quarter 2011

On January 12, 2009, Tronox Incorporated and 14 of its affiliates (collectively, "Tronox") filed petitions with the United States Bankruptcy Court, Southern District of New York under chapter 11 of the Bankruptcy Code. Pursuant to its joint plan of reorganization, Tronox entered into an environmental settlement agreement and related agreements by which Tronox transferred all of its right, title, and interest with respect to remedial obligations at Henderson, Nevada to the Nevada Environmental Response Trust (the "Trust"). This transfer occurred on February 14, 2011 and NDEP has in turn transferred Permit #NEV2001515 to the Trust. Additionally, this permit was renewed, effective July 7, 2011 and includes ponds GW-11 and AP-5, both associated with the continuing Henderson perchlorate remedial efforts.

As indicated, the Trust maintains Permit #NEV2001515 which covers the synthetically double-lined ponds GW-11 and AP-5. No water was discharged directly to a receiving water body from either GW-11 or AP-5 pond. However, water from both GW-11 and AP-5 ponds (along with other groundwater sources) was treated for perchlorate removal and discharged under the authority of an NPDES permit NV0023060. The attached Discharge Monitoring Reports, DMR's, (Attachment 1) and accompanying tables provide the ponds' operational information. Included with this correspondence are the October, November and December 2011 DMRs. Also included with this fourth quarter report are pictures of both GW-11 pond and AP-5 pond.

Please note that AP-5 pond's top liner has a tear at the top edge of the pond, which is well above the liquid level of the pond contents. The pond is a synthetically double-lined pond and there is no evidence that the underlying liner has been compromised. In addition, the monitoring well which is located between the top liner and the bottom liner to collect any water which accumulates between the liners, has not shown evidence of water presence. The split top liner has been sandbagged to prevent a strong breeze from lifting the edges and the top liner tear will be closely monitored.

Should you have any questions concerning this report, please contact Susan Crowley at (702) 592-7727 (cell) or e-mail [smcrowley@cox.net](mailto:smcrowley@cox.net). Thank you.

Sincerely,



Allan DeLorme, P.E.  
Managing Principal

Overnight Mail  
Attachments

Compliance Coordinator  
January 23, 2012  
Page 2

cc: Please see attached distribution sheet

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Documents\Documen

Smc/11 4th Q Pond DMR - Environ Cvr Ltr.docx

# Tronox Document Distribution List

Updated:

20-Oct-11

Document Name: Pond Permit NEV2001515DMRs \*


\* Cover letter includes everything but the analytical reports on CD (Data) - and is reproduced in a 2-sided transmittal

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Ritchie	Chris	Environ		X	
Pekala	John	Environ		X	
Knox	Craig	Environ		X	
Gibson	Jeff	AmPac			
Stowers	Kirk	Broadbent			
Sahu	Rahnijit	BMI			
Crouse	George	Syngenta			
Erickson	Lee	Stauffer			
Kelly	Joe	Montrose			
Sundberg	Paul	Montrose			
Gibson	Jeff	AmPac			
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Mack	Joel	Montrose Counsel			

Discharge Permit NEV2001515 – 4<sup>th</sup> Q 2011 DMR  
CEM Certification

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and, to the best of my knowledge, comply with all applicable federal, state and local statutes, regulations and ordinances.



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Susan Crowley  
CEM 1428, expires 3-8-13

# **ATTACHMENT 1**

## **Discharge Monitoring Reports**

11-October DMR  
NEV2001515.xlsx

**October 2011**

11-November DMR  
NEV2001515.xlsx

**November 2011**

11-December DMR  
NEV2001515.xlsx

**December 2011**

PERMITTEE NAME/ADDRESS:

NAME: Nevada Environmental response Trust  
 ADDRESS: CO Veolia Water NA  
 510 Fourth Street  
 Henderson, NV 89015

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
**DISCHARGE MONITORING REPORT (DMR)**

NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust  
 LOCATION: Henderson, NV  
 ATTN: Susan Crowley

MONITORING PERIOD							
FROM	11	10	01	TO	11	10	31

NO DISCHARGE

NOTE: Read instructions before completing this form.

PARAMETER	SAMPLE MEASUREMENT / PERMIT REQUIREMENT	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave (lb/day)	UNIT			
Flow Influent	SAMPLE MEASUREMENT	Please see attached Table 1		MGD	-----	-----	-----		0	Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Leak Detection Information	SAMPLE MEASUREMENT	-----	-----		Please see attached Table 2		-----		0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT				Monitor and Report						
Pond Water Level	SAMPLE MEASUREMENT	-----	-----		Please see attached Table 1		-----		0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT				Monitor and Report						
Storage Volume	SAMPLE MEASUREMENT	-----	-----		Please see attached Table 1		-----		0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT				Monitor and Report						
Water Balance Information	SAMPLE MEASUREMENT				Please see attached Table 1		-----		0	Monthly	Calculation
	PERMIT REQUIREMENT				Monitor and Report						
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME / TITLE PRINCIPAL EXECUTIVE OFFICER  
**Susan Crowley**  
 CEM 1428, exp 3-8-13  
 TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

*Susan Crowley*  
 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: 702-592-7727  
 DATE: 12 01 23  
 AREA CODE NUMBER: 702  
 YEAR MO DAY: 11 10 20

COMMENT AND EXPLANATION OF ANY VIOLATIONS  
 Ponds GW-11 and AP-5

(Reference all attachments here)

Forms by WindowChem(707)864-0845;pn11090;v5.01;4/1/96

PERMITTEE NAME/ADDRESS:

NAME: Nevada Environmental response Trust  
 ADDRESS: CO Veolia Water NA  
 510 Fourth Street  
 Henderson, NV 89015

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**DISCHARGE MONITORING REPORT (DMR)**

NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust  
 LOCATION: Henderson, NV  
 ATTN: Susan Crowley

MONITORING PERIOD					
FROM	11	11	01	TO	11   11   30

NO DISCHARGE

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	PERMIT REQUIREMENT				Monitor and Report						
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DISCHARGE MONITORING REPORT (DMR)

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PERMIT NUMBER	DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust  
 LOCATION: Henderson, NV  
 ATTN: Susan Crowley

MONITORING PERIOD							
FROM	11	12	01	TO	11	12	31

NO DISCHARGE

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(Reference all attachments here)

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## ATTACHMENT 2

### Pond Monitoring Results

11 4th Q GW11 Pond current pond liner  
Levels.xls gallons - 4th Q 11.xls

#### GW-11 Pond Data

GW-11 Balance - 4th  
Q 11.xls

#### GW-11 Water Balance



11 4th Q - AP-5 Pond OnM Manual for NEV  
Data - Level and Leal 2001516 - Sept 2006

#### AP-5 Pond Data



AP5 Balance - Oct  
11.xls



AP5 Balance - Nov  
11.xls



AP5 Balance - Dec  
11.xls

#### AP-5 Water Balance

**Table 1a – GW-11 Pond Monitoring Information**

Date	Flow Into Pond (MGD)	Pond Level (feet)	Storage Volume (thousand gallons)	Water Balance (million gallons)	Flow from Pond to FBR's * (thousand gallons)
10-1-11	0.03	0.89	3,232	-1.13	443
10-15-11		1.48	5,312		1,514
11-1-11	0.076	0.89	3,232	0.80	420
11-15-11		1.5	5,402		612
12-1-11	-0.111	2.27	8,963	-4.89	1,728
12-15-11		1.74	6,250		2,122

**Table 1b – AP-5 Pond Monitoring Information**

Date	Flow Into Pond (MGD)	Pond Level (feet)	Storage Volume (thousand gallons)	Water Balance (million gallons)	Flow from Pond to FBR's * (thousand gallons)
10-3-11	0.02	4.92	517	-0.086	312
10-17-11		5.58	613		0
11-2-11	0.06	5.67	627	-0.17	297
11-16-11		5.50	599		1,186
12-1-11	0.02	6.33	741	-0.25	438
12-15-11		5.92	670		0

**Table 2a – GW-11 Pond Leak Detection Monitoring**

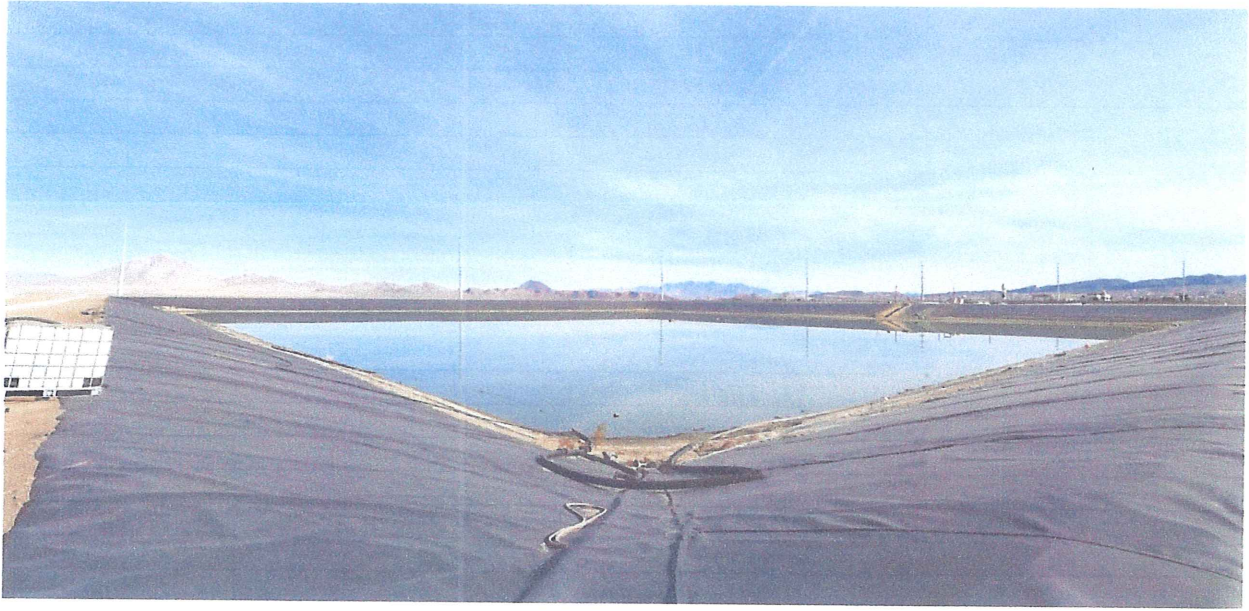
Date	Volume in Detection Well (gallons)
10-6-11	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry
10-20-11	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry
11-3-11	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry
11-17-11	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry
12-1-11	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry
12-15-11	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry

**Table 2b – AP-5 Pond Leak Detection Monitoring**

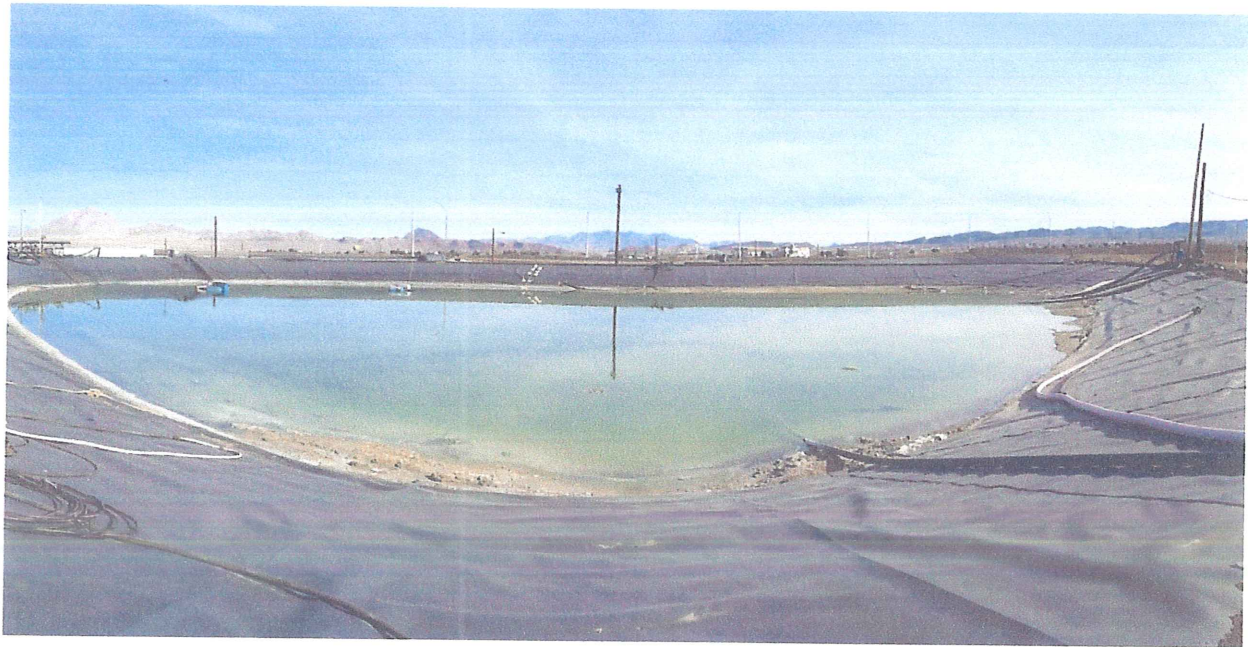
Date	Volume in Detection Well (gallons)
10-3-11	Dry
10-17-11	Dry
11-2-11	Dry
11-16-11	Dry
12-1-11	Dry
12-15-11	Dry

## **ATTACHMENT 3**

**Annual Pond  
Pictures**



**GW-11 Pond December 2011 - from SW Corner Looking NE**



**AP-5 Pond December 2011 – from SW Corner Looking NE**