TRONOX

William K. Taylor Production Manager (702) 651-2235 Fax (405) 302-4607 bill.taylor@tronox.com

July 25, 2008

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

SUBJECT: Second Quarter 2008 DMR - NPDES Permit # NV0000078

Tronox LLC (Tronox) maintains an NPDES Permit #NV0000078 covering its production operations in Henderson, Nevada. The attached Discharge Monitoring Reports (Attachment 1) reflect discharge from the Tronox Henderson facility as monitored by NPDES equipment. Stabilized water, from water leaks, discharged through the outfall collection systems for brief periods are guantified in Table 1a, below. Storm water discharge is quantified in Table 1b, below.

	Table 1a. N	Ion-Storm Flow Total	5
Outfall	April Flow (thousands of gallons)	May Flow (thousands of gallons)	June Flow (thousands of gallons)
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Table 1b. Stormwater Flow Totals May Flow June Flow April Flow Outfall (thousands of gallons) (thousands of gallons) (thousands of gallons) 0 0 0 001 0 0 0 002

*Although minor flows were recorded on the flow meter, due to the low flows & overall length of the

onsite storm water ditch, water was contained onsite and was not discharged off site.

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b Very low, intermittent flows. Max daily flow averaged <0.1 gpm. Was unable to sample this low non storm flow.</p>

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Once through cooling water, sample taken.

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003

Very low, intermittent flows. Max daily flow averaged <0.4 gpm. Was unable to sample this low non storm flow.

Analytical associated with outfall flow is attached to this report. Should you have any questions concerning this report, please contact Susan M. Crowley at (702) 651-2234 or e-mail susan.crowley@tronox.com. Thank you.

Sincerely William K. Tavlø Production Manager

Overnight Mail cc: Susan Crowley Matt Paque Mr. Carey Houk (W-5-3)/U.S. EPA Region 9 Attachments

> Tronox LLC 8000 West Lake Mead Parkway, Henderson, Nevada 89015 • P.O. Box 55, Henderson, Nevada 89009

ATTACHMENT 1

Discharge Monitoring Reports

April 2008

May 2008

June 2008

Discharge Monitoring Report

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April 2008

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Note^a: 100 gpd was recorded on three separate occasions (total monthly flow: 300 gals.). The composite sampler was unable to sample this low, intermittent flow. PAGE 1 OF 1

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Discharge Monitoring Report

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PERMITTEE NAME/ADDRESS:	NAME:	ADDRESS:	

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PO Box 55 Henderson, NV	
DRESS	

Tronox LLC	BMI Park - Henderson	Susan Crowley
FACILITY:	LOCATION:	Attn:

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COMMENT AND EXPLANATION OF ANY VIOLATIONS

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702-651-2200

SIGNATURE OF PRINCIPAL EXECUTIVE

OFFICER OR AUTHORIZED AGENT

(Reference all attachments here)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (WPDES) DISCHARGE MONITORING REPORT (DMR) NV0000078 DISCHARGE NUMBER F - FINAL	MONITORING PERIOD MAJOR 05 01 TO 08 05 31 NO DISCHARGE X NOTE: Read instructions before completing this form	REQUENCY S	UNITS MINIMUM AVERAGE MAXIMUM UNIT EX ANALYSIS TYPE	******	**** OPTIONAL REPORT ONCE DISCRE	****** (19) 0	**** OPTIONAL REPORT ONCE DISCR	****** (19) 0	**** OPTIONAL REPORT ONCE DISCOL										WARTHATTHERE, DESIGNATURE OF PRINCIPARCEXECUTIVE 702-651-2200 US U/ 20 THE PREMERTING HTS. AND OFFICER OR AUTHORIZED AGENT AREA CODE NUMBER YEAR NO DAY
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PAGE 2 OF 2

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Discharge Monitoring Report

June 2008

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DISCHARGE 002

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Note ^a. 30 day average flow was 228 gpd (highest daily flow recorded was 500 gals.) The composite sampler was unable to sample this low, intermittent flow.

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Tronox LLC Fourth Quarter 2007 NPDES Permit NV0000078

Supporting **Analytical Reports**

I hereby certify that all laboratory analytical data was generated by a laboratory certified by the NDEP for each constituent and media presented herein, exceptions and corresponding justifications are provided below.

Michael Skinn da Michael Skromyda, CEM 2121, exp. 10-18-09



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MWH Laboratories

750 Royal Oaks Drim, Sidia 100 Monrovia, California S1018-3829 Tel: 826 385 1100 Fax: 826 385 1101 1 800 556 LABS (1 800 566 5227)

Laboratory Report

for

Tronox LLC Henderson Plant P.O. Box 55

Henderson , NV 89009

Attention: Susan Crowley Fax: (405) 302-4607

DATE OF ISSUE Jun 20 2008 MWH LABORATORIES

• •

ADE Andy Eaton Project Manager



Report#: 240633 Project: CLO4 PO#: Susan Crowle

Laboratory certifies that the test results meet all NELAC requirements unless noted in the Comments section or the Case Narrative. Following the cover page are Comments, QC Report, QC Summary, Data Report, Hits Report, totaling 6 page[s].



750 Royal Oaks Drive, Sulle 100 Monrovia, California 91016-3629 Tet: 626 386 1100 Fax: 626 386 1101 1 800 566 LABS (1 800 566 5227)

June 23, 2008

Ms. Susan Crowley Tronox PO Box 55 Henderson, NV 89009

Subject: Case Narrative report 240633

Enclosed is MWH Laboratories Report 240633

Sample receipt: The samples arrived at MWH Laboratories, Monrovia, CA on May 13, 2008 with proper chain of custody. All containers were received without any visible signs of tampering or breakage at proper temperature. Samples are identified on the acknowledgement, which is part of the report package, along with the chain of custody.

Case Narrative: For the MWH Laboratories data the following issues were observed:

Note that for ion chromatography analyses such as perchlorate, the exact analysis time is not typically shown on the report. Either a 00:00 is shown or the time of injection of the first sample in the batch.

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Sincerely,

andrew Eaton

Andrew Eaton, PhD Project Manager

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. Page 1	Group #	Date Received		ddress derson Plant	20. Bax 55. Henderson, NV 89009			Comments	SHPPING	PLEASE SEND	IN 4 COOLERS		to be sent back	on as needed	basis from	outfall samples						
		ProjectName		Billing Address Kerr McGee, Henderson, Plant	PO Box 55 Henderson, NV 89009		# TCG M F	ŕ								-						Prepared By
Plant		sc-1	15	t				lf any		1-03i												# of Coolers
ttle Order for Ken Mogee Henderson F	750 Royal Oaks Drive Suite 100 Monrovia CA 91016 (626) 386-1100 FAX (626) 386-1124	Client Code KERRMCGEE-MN Project Code CLQ4	eturn this paper with your samples	Send Report to Kerr MrGee Henderson Plant	*****	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	ATTN: Susan.Crowley PHONE: 702-651-2234 FAX: 702-651-2310	r each si	1 500ml poly/ no preservative	1 125ml poly /no preservative AMBER IF WITH CLO3!												Tracking #
t, Inc. Bo	86-1124	anager Mail	lease I	e Kits to	Drive			Qteline#														Via
ratories, a Divsion of MWH Americas	Daks Drive Suite 100 A 91016 (626) 386-1100 FAX (626) 3	saton	Sampler: please return this	Ship Sample Kits to	Ketr.McJees 8000.West.Lake.Mead.Drive. HendersonNV 89015	***************************************	ATTN: Kellb.Hashrouck	Tests		,O,PH			angu - Shing an		nami dana katangan katang manang katang manang katang manang katang manang katang manang katang manang katang m			and a subscription of the second s	1998 - 1997			Jate Shipped
	T50 Royal O Monrovia C/	Andrew Eaton	30# 44541	treated by ADE	rder Date 01/14/08 ate Needed	/ Client 01/21/08	ate Samples Arrive at MWL	t of Samples	6 TDS	CLO4,EC,PH							S	N	V		*****	ode Status

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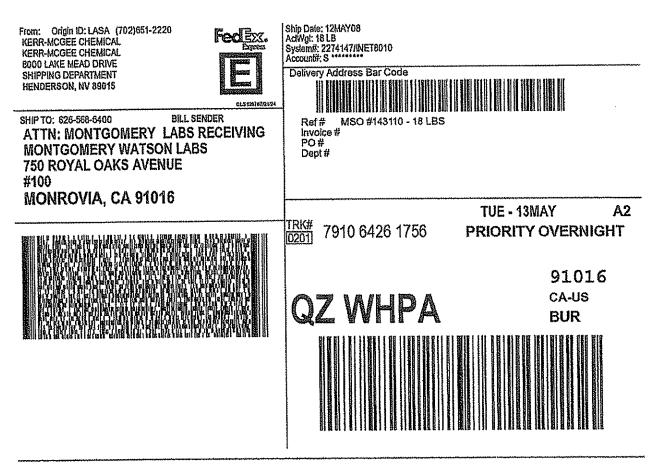
THIS MEMORANDUM is an acknowledgement that a Bill of Lading has been issued and is not the Otiginal Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

RECEIVED subject to the classifications and lawfully filed tarities in effect on the date of the issue of this Bill of Lading.

From: TRONOX LLC the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said Carrier (the word Carrier being undershood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usus place of delivery at said destination. It on its route, otherwise to deliver to another Camer on the route to said destination. It is mutually ogreed, as to each Carrier of all or any said property over all or any portion of said route to another Camer on the route to said destination. It is mutually ogreed, as to each Carrier of all or any said property over all or any portion of said route to another Camer on the route to said destination. It is mutually ogreed, as to each Carrier of all or any said property over all or any portion of said route to another Camer on the route to said destination. It is mutually ogreed, as to each Carrier of all or any said property over all or any portion of said route to another Camer on the route to said destination. It is mutually ogreed, as to each Carrier of all or any said property over all or any portion of said route to another Carrier of all or any of said property, that every sorvice to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set toth (1) in Uniform Freight Classification in effect on the date hereof, it ihis is a reli or a rail-water shipment, or (2) in the appleable motor carrier classification or to iff if this is a motor carrier shipment. Shipper hurdby certifies that he is familiar with all the terms and conditions of the said terms and conditions are hereby agreed to by the Shipper and accepted for himself and this asigns.

CARRIER						Da	te		FROM NO. STATION: STATE
							112/	'08	Henderson, NV 89015
MWHL	ABORA	TORIES	Suite #100	<u></u>		l			Authorization S. CROWLEY FULL NAME OF SHIPPER TRONOX LLC
Monro	ia, CA 9	1016-362	9						
	: 626-568								CODE NO. WCN IS
FREIGHT CH						***			1375.48215
Prep:	aid 🗌	Collect	CUSTOMER PO OR REQ	As htra	······	SHI	PEDF	ROM	If it moves between two ports by water, the
N/AR			Coartometer to on them			He	nde	rson, NV	taw requires that the Bill of Lading shall state whether it is Carrier's or Shippers weight.
LINE NO,	<u>, 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 19</u>	DESC	RIPTION AND CLASSIFICATI	ON	5	TOCICN		TOTAL QUANTITY	
	1	st with wa)02 analy	ter Leak Sampl					1 COOLER	Subject to Section 7 of Conditions of applicable Bitt of Lading, if this shipment is to be delivered to the Consigner without recourse on the Consignor, the Consignor shatt sign the following statement: The Carrier shall not make delivery of this shipment without payment of freight and all other towlot charges. TRONOX LLC
									The description and weight indicated on this Bit of Lading are correct. Subject to verification by the Governing Weighing and Inspection Bureau according to Agreement.
TRUCK SHI	PMENTS		••••			~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~			FOR CHEMICAL EMERGENCY-SPILL, LEAK. FIRE, EXPÓSURE OR ACCIDENT
PLACARDS	OFFERED	YES	PLACARDS ACC		ES				CALL CHEMITREE - DAY OR NIGHT
		X NO			<u>0</u>				800-424-9300 483-7616 IN DISTRICT OF COLUMBIA
NUMB	ER OF PACKAGE	5	GROSS WEIGHT	TARE V			NET	TWEIGHT	202-483-7616 FROM OUTSIDE THE
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	1	1	TOTAL GROSS WEIGHT 18		TAL VEIGHT]			18	"Shippers imprint in lieu of slamp; nul a part of Bill of Lading approved by the Interstate
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TRONOX	LLC Imaneni pest offic O Box 268859, Ok	e address of	PER Lemma H	**************************************	AGENT			PE Que	
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SHIPPER'S NUMBER: 143110



After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inliget printer.

2. Fold the printed page along the horizontal line.

3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

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Page 1 of 1



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Report Comments #240633

750 Royal Oaks Drive, Sulla 100 Monrovia, California B1016-3629 Tel: 626 386 1100 Fax: 626 385 1101 1 800 366 LABS († 600 Sec 5227)

Client Specific Comments I hereby certify that all laboratory analytical data was generated by a laboratory certified by the NDEP for each constituent and media presented herein. Signature:

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(D MWH Labo A Disision of MWH Americas, Inc. 750 Poyal Oaks Drive, Suite 160 Monravia, California 91018-3629 Tel: 626 386 1100 Fas: 628 386 1100 Fas: 628 386 1100 1 800 560 LABS (1 800 566 5227)	ratories		Ľ.	aboratory Hits Repo #240633	rt
	Fronox LLC Hende Susan Crowley P.O. Box 55 Henderson , NV	rson Plant 89009		Sampl 13-may-	es Receive 2008 17:4!	èd 9:00
Analyzed	Sample#	Sample ID	Result	Federal MCL	UNITS	MRL
	2805130549	OUTFALL 002				
05/13/08 06/09/08 05/14/08 05/18/08	Perchlorate Specific Condu	, not compliant) actance ad Solid (TDS)	7.9 12 1570 1140	6.5~8.5	Units ug/l umho/cm mg/l	0.010 8.0 2.0 10
05/18/08	2805130550	STABILIZED WATE	R 674	500	mg/1	10

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Laboratory Data Report #240633

MWH Laboratories

750 Royal Oaks Drivn, Solte 100 Monrovis, California 81016-3829 Tel: 626 386 1100 Pak: 626 386 1100 I 800 566 LABS (1 600 566 5227)

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Tronox LLC Henderson Plant Susan Crowley P.O. Box 55 Henderson , NV 89009 Samples Received 05/13/08

Prepared Anslyzed	QC Ref#	Method	Analyte	Result	Units	MRL	Dilution
OUTFALL 002 (2)	805130	549)	Sampled on 05/1	2/08 15:00			
		(EPA 314) Perchlorate	12	ug/l	8.0	2
06/09/08 17:58		(SM 2510B) Specific Conductance	1570	umho/cm	2.0	1
05/14/08 00:00		• • • • • • • • • • • • • • • • • • • •	· · · · · · · · · · · · · · · · · · ·	meliant) 7.9	Units	0.010	ı
05/13/08 00:00 05/18/08 05/18/08 15:53		(SM 4500-HB (E160.1/SM2	S40C) Total Dissolved Solid		mg/1	10	l
STABILIZED WAT 05/18/08 05/18/08 15:44	-	05130550 (e160.1/8M2) Sampled on (\$400) Total Dissolved Solid	05/12/08 15:00 (TDS) 674	ng/l	10	l

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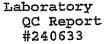
Laboratory
QC Summary
#240633

750 Royal Osks Drive, Sulta 160 Isuntovia, Calilurnia 21016-3629 Tel: 026 086 1100 Fax: 626 326 1101 1 800 566 LABS (1 800 566 5227)

Tronox LLC Henderson Plant

MWH Laboratories

QC Ref #426703 - PH (H3=past HT, not compliant) Analysis Date: 05/13/2008 Analyzed by: nem OUTFALL 002 2805130549 Analysis Date: 05/14/2008 QC Ref #427036 - Specific Conductance Analyzed by: nem 2805130549 OUTFALL 002 Analysis Date: 05/18/2008 QC Ref #428899 - Total Dissolved Solid (TDS) Analyzed by: axa OUTFALL 002 2805130549 Analyzed by: axa STABILIZED WATER 2805130550 Analysis Date: 06/09/2008 QC Ref #431473 - Perchlorate Analyzed by: maria OUTFALL 002 2805130549





760 Royat Oaks Drive, Suite 160 Monrovia, Chilomite D1016-3629 Tel: 626 366 1100 Fax: 628 366 1101 1 800 566 LASS (1 600 566 5227)

Tronox LLC Henderson Plant

QC Ref #426703 PH (H3=past HT, not compliant)

oc	Analyte	Spiked	Recoverad	Units	Yield (%)	Limits (%)	RPD (%)
AASPKSNP	Spiked sample	Lab # 28	05120360	UNIT		(0-0)	
DUP	PH (H3=past HT, not compliant)	8.34	8.36	UNIT		{ 0-20 }	0.2

QC Ref #427036

Specific Conductance

QC	Analyte	Spiked	Recovered	Units	Yield (%)	Limits (%)	RPD (%)
DUP	Specific Conductance	656	653	UMHO		(0-20)	0.5
DUP2	Specific Conductance	1064	1068	UMHO		(0-20)	0.4
LCSL	Specific Conductance	1000	989	UMHO	98.9	(90-110)	
LCSZ	Specific Conductance	1000	996	UMHO	99.6	(90-110)	
MBLK	Specific Conductance	ND	<2.0	UMHO			
MRL_CHK	Specific Conductance	2.00	2.13	UNHO	106.5	(50-150)	

QC Ref #428899

Total Dissolved Solid (TDS)

00	Analyte	Spiked	Recovered	Units	Yield (%)	Limits (%) RPD (%)
AASPKSMP	Spiked sample	Lab # 28	05130427	MGL		(0-0)
DUP	Total Dissolved Solid (TDS)	3964	3968	MGL		(0-10) 0.1
LCS1	Total Dissolved Solid (TDS)	175	152	MGL	86.9	(80-114)
LCS2	Total Dissolved Solid (TDS)	700	670	MGL	95.7	(80-114)
MBLK	Total Dissolved Solid (TDS)	ND	<10	ngl		
MRL CHK	Total Dissolved Solid (TDS)	10.0	ß	NGL	80.0	(50-150)
RPD LCS	Total Dissolved Solid (TDS)	85.857	95.714	MGL	9.7	(0-20)

QC Ref #431473

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Perchlorate

QC	Analyta	Spiked	Recovered	Units	Yiald (%)	Limits (%) RPD (%)
	Spiked sample	Lab # 28	05140871	ugl		(0-0)
LCSI	Perchlorate	25.0	24.1	UGL	96.4	{ 85-115 }
LCS2	Perchlorate	25.0	24.0	UGL	96.0	(85-115)

Spikes which exceed Limits and Method Blanks with positive results are highlighted by <u>Underlining.</u> Criteria for MS and DUP are advisory only, batch control is based on LCS. Criteris for duplicates are advisory only. unless otherwise specified in the method.



750 Royal Oaks Drive, Suite 100 Monravis, Chilonth. 91010-3629 Tel: 628 388 1100 Fax: 628 368 1101 1 800 508 LABS (1 808 568 5227)

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Tronox LLC Henderson Plant (continued)

		2	2.09	UGL	104.5	(75-125)
LCS3	Perchlorate		<4.0	UGL		
MBLK	Perchlorate	ND		UGL	100.0	{ 80-120 }
MS	Perchlorate	25.0	25.0			(80-120)
	Perchlorate	25.0	24.8	UGL	99.2	
MSD		96.400	96.000	UGL	0.4	(0-15)
RED_PCS	Perchlorate	100.000	99.200	UGL	1.0	(0-15)
RPD_MS	Perchlorate	2001000				

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Spikes which exceed Limits and Method Blanks with positive results are highlighted by <u>Underlining</u>. Criteria for MS and DUP are advisory only, batch control is based on LCS. Criteria for duplicates are advisory only, unless otherwise specified in the method.

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