

William K. Taylor Production Manager

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October 27, 2008

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

SUBJECT: Third Quarter 2008 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.

The new level controlled leak collection sump pump for the WC-East Pond leak detection sump was installed July 24, 2008. Having a level indication along with pump flow meter proved helpful in monitoring & verifying the dewatering of the leak collection area between the primary and secondary liners. Pumping rates were initially high while dewatering the leak collection area and tapered off as the dewatering progressed throughout the quarter. As of the first of October, the leak collection area appears to be dewatered and the leak collection sump level isn't increasing. Although it is difficult to draw conclusions from this preliminary data, this appears to indicate there isn't a liner leak at the current pond level. With this new monitoring system in place, the leak collection sump level will be continuously monitored along with the pond level to evaluate the condition of the liner and identify any leaks that are present.

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

Sincerely,

William K Taylor

Production Manager

**Overnight Mail** 

cc: Mike Skromyda John Hatmaker

Attachments

Tronox. Adding value beyond the product.

# **ATTACHMENT 1**

# Discharge Monitoring Reports

July 2008

August 2008

September 2008

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PERMITTEE NAME/ADDRESS: NAME: Tronox LLC ADDRESS: PO BOX 5£ HENDERSON, NV 89009-7000	0002-60068		DISC NEV PERMIT NUI	NATIONA DISCHARGE MO NEV2001516 T NUMBER	NATIONAL POLLUTANT DISCHARGE ELIMIN DISCHARGE MONITORING REPORT (DMR) NEV2001516 T NUMBER DISCHARGE	NATIONAL POLLUTANT DISCHARCE ELIMINATION SYSTEM (NPDES) GE MONITORING REPORT (DMR) 1516 DISCHARGE NUMBER	(NPDES)	29			
FACILITY: Tronox LLC LOCATION: Henderson, NV Attn: Michael Skromvda			FROM 08	MONIT 07   01	MONITORING PERIOD	07   31	NOTE: Read instructions before completing this form.	HARGE	X completin	g this form.	
PARAMETER		QUAI	QUANTITY OR LOADING			QUALITY OR CONCE	CONCENTRATION		NO. F	FREQUENCY	SAMPLE
		AVERAGE	MAXIMUM	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave (Ib/dav)	UNIT	Ж	OF ANALYSIS	ТҮРЕ
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PAGE 1 OF 1

HENDERSON, NV 89009-7000 Tronox LLC ADDRESS: PO BOX 55 PERMITTEE NAME/ADDRESS: NAME:

DISCHARGE MONITORING REPORT (DMR) NEV2001516 PERMIT NUMBER

001 DISCHARGE NUMBER

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

08 01

08

FROM

LOCATION: Henderson, NV

FACILITY: Tronox LLC

× NO DISCHARGE

NOTE: Read instructions before completing this form

Discrete Discrete Calculation Calculation SAMPLE TYPE Flow Meter 08 | 10 | 27 DATE FREQUENCY OF ANALYSIS **Bi-Monthly Bi-Monthly Bi-Monthly** Monthly Monthly 702-651-2200 ÑМ TELEPHONE 0 0 0 0 0 UNIT 30 Day Ave (lb/dav) SIGNATURE OF PRINCIPAL EXECUTIVE QUALITY OR CONCENTRATION I 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 CERTEP VISUER REALITY OF LAW THAT THE DOCARDER YOR AND ALL ATTACHORENS WARE REPRESED FOR SUM YOR DECINON SUR ETHENDER IN ACCOUNTER WITH ASSTELLE RESEARCE TO SUR ALL PLATE OF LAW ALL PLATE AND ADDRESS THAT OULTER PRESEARCE REPRESEARCH AND ADDRESS THAT OULTER PRESEARCH AND ADDRESS UNITS MGD QUANTITY OR LOADING Please see attached Table MAXIMUM Monitor and Report AVERAGE PERMIT REQUIREMENT PERMIT REQUIREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE PERMIT NAME / TITLE PRINCIPAL EXECUTIVE OFFICER PERMIT PERMIT PERMIT PERMIT Leak Detection Information Water Balance Information Production Manager William K. Taylor Attn: Michael Skromyda PARAMETER Pond Water Level Storage Volume Influent Flow

00044/961223-1801

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

AREA CODE NUMBER

OFFICER OR AUTHORIZED AGENT

(Reference all attachments here)

COMMENT AND EXPLANATION OF ANY VIOLATIONS

Facilty Ponds

TYPED OR PRINTED

NAME: Tronox LLC			DISCI	HARGE MO	DISCHARGE MONITORING REPORT (DMR)	(DMR)					
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Leak Detection Information	SAMPLE MEASUREMENT				Please see att	see attached Table 2			B 0	Bi-Monthly	Discrete
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Pond Water Level	SAMPLE MEASUREMENT				Please see attached Table	ached Table 1			B 0	Bi-Monthly [	Discrete
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Water Balance Information	SAMPLE MEASUREMENT				Please see attached Table	tached Table 1			0	Monthly C	Calculation
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NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

PERMITTEE NAME/ADDRESS:

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## ATTACHMENT 2

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## Pond Monitoring Results

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#### Table 1a - Mn-1 Pond Monitoring Information

	ond morntoring in			
Date	Flow Into Pond	Storage Volume (thousand gallons)	Water Balance	Discharge from
	(MGD)	(thousand gallons)	(thousand gallon)	Pond (thousands
				gallons)
7/14/08		1,763		
7/31/08	0.006	1,944	589	0
8/11/08		1,944		
8/28/08	0.001	1,944	511	0
9/8/08		1,944		
9/26/08	0.002	1,730	145	0

#### Table 2a - Mn-1 Pond Leak Detection Monitoring

Date	
7/14/08	0
7/31/08	0
8/11/08	0
8/28/08	0
9/8/08	0
9/26/08	0

#### Table 1b - WC East Pond Monitoring Information

D-4-		Close of Volume	Water Delegas	Discharge from Dand
Dale				Discharge nom Fond
	(MGD)	(thousand gallons)	(thousand gallon)	Discharge from Pond (thousand gallons)
A strain of the				
7/14/08		4,105		
7/31/08	0.101	6,061	824	0
8/11/08		7,060		
8/28/08	0.148	7,060	576	0
9/8/08		6,821	And a second second second second	
9/26/08	0.149	6,849	-47	0

Table 2b - WC-East Pond Leak Detection Monitoring

<u>Note:</u> The new leak detection sump pump (with level sensor) was installed on July 24, 2008. Since its installation, minor adjustments were made to get the system into automatic operation. The gallons pumped noted in Table 2b are the total gallons pumped during each 2 week period. This pump now operates on a level sensor. The sump level and pump rate are continuously monitored and recorded on a data logger.

Date	Volume in Detection Well (gallons
	pumped)
7/14/08	North – 2,205
7/14/08	South – 0
7/31/08	North – 5,734
7/31/08	South – 0
8/14/08	North – 9,401
8/14/08	South – 0
8/28/08	North – 3,623
8/28/08	South – 0
9/14/08	North – 223
9/14/08	South – 0
9/28/08	North – 603
9/28/08	South 0

	Pond	Storage Volume (thousands gallons)	Water Balance (thousands gallon)	Discharge from Pond (Ihousand gallons)
7/14/08				
7/31/08	0.011	8,265	128	0
8/11/08		8,186		
8/28/08	0.019	8,048	107	0
9/8/08		7,990		
9/26/08	0.011	7,902	258	0

#### Table 1c - WC-West Pond Monitoring Information

### Table 2c - WC-West Pond Leak Detection Monitoring

Date	Volume in Detection Well
7/14/08	(gallons pumped) North – 0
7/14/08	South – 0
7/31/08	North – 0
7/31/08	South – 0
8/11/08	North – 0
8/11/08	South – 0
8/28/08	North – 0
8/28/08	South – 0
9/8/08	North – 0
9/8/08	South – 0 <sup>-</sup>
9/26/08	North 0
9/26/08	South – 0

### Table 1d - AP-5 Pond Monitoring Information

Date	Flow Into Pond (MGD)	Storage Volume (thousand gallons)	Water Balance (thousand gallon)	Discharge from Pond (thousand gallons)
7/1/08	(100)	786		
7/17/08	0.002	831	380	0
8/1/08		861		
8/15/08	0.001	892	247	0
9/3/08		801		
9/16/08	0.007	698	239	0

Note a: Field readings for pond inlet flows being verified.

#### Table 2d - AP-5 Pond Leak Detection Monitoring

Date	
	(gallons pumped)
7/1/08	0
7/17/08	0
8/1/08	0
8/15/08	0
9/3/08	0
9/16/08	0