

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

January 27, 2009

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

SUBJECT: Fourth 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 is proving helpful for monitoring and identifying leaks between the primary and secondary liners. Preliminary data collected indicates the bottom of the pond does not have any leaks. To check the upper sections of the liners the pond level was slowly increased over the 4<sup>th</sup> quarter. No leakage was detected in October or November, but flow into the leak detection sump was recorded in December 2008 (See Table 2b.). Currently, the leak detection sump is continuing to be monitored and a pond liner repair schedule is being evaluated for later this year, when the pond level can be lowered below the level where 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

Attachments

Tronox. Adding value beyond the product.

## **ATTACHMENT 1**

## Discharge Monitoring Reports

October 2008

November 2008

December 2008

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

09 | 01 | 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

PO BOX 55 HENDERSON, NV 89009-7000

Tronox LLC

ADDRESS:

NAME

PERMITTEE NAME/ADDRESS:

DISCHARGE NUMBER

NOTE: Read instructions before completing this form

NO DISCHARGE

31

10

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0

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19

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FROM

OCATION: Henderson, NV

Attn: Susan Crowley

FACILITY: Tronox LLC

MONITORING PERIOD

Discrete Calculation Discrete Calculation SAMPLE Meter TYPE Flow DATE FREQUENCY Monthly Bi-Monthly Bi-Monthly Bi-Monthly Monthly ANALYSIS TELEPHONE Š. 0 0 0 X 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 CHERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT, AND ALL ATTACHMENTS WERE PREPARED INDURE MY DIRECTION OF REPRESENTATION OF THE THE PERSON OF THE THE THE STATE OF THE STATE OF THE THE STATE OF THE STATE UNITS MGD QUANTITY OR LOADING Please see attached Table 1 MAXIMUM Monitor and Report AVERAGE SAMPLE MEASUREMENT PERMIT REQUIREMENT SAMPLE MEASUREMENT REQUIREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT SAMPLE PERMIT SAMPLE SAMPLE PERMIT PERMIT NAME / TITLE PRINCIPAL EXECUTIVE OFFICER Leak Detection Information Water Balance Information Fredrick R. Stater PARAMETER Pond Water Level Storage Volume nfluent Flow

COMMENT AND EXPLANATION OF ANY VIOLATIONS TYPED OR PRINTED

Facilty Ponds

Plant Manager

(Reference all attachments here)

00044/961223-180

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

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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

FACILITY: Tronox LLC

DISCHARGE NUMBER

NO DISCHARGE 30

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FROM

NOTE: Read instructions before completing this form

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MONITORING PERIOD

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COMMENT AND EXPLANATION OF ANY VIOLATIONS TYPED OR PRINTED Facilty Ponds

Plant Manager

(Reference all attachments here)

00044/961223-1801

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

09 | 01 | 27

702-651-2200

OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

ADDRESS: PO BOX 55 HENDERSON, NV 89009-7000

Tronox LLC

PERMITTEE NAME/ADDRESS:

LOCATION: Henderson, NV

FACILITY: Tronox LLC

NEV2001516 PERMIT NUMBER

DISCHARGE NUMBER

MONITORING PERIOD

NOTE: Read instructions before completing this form

NO DISCHARGE

3

12

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FROM

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COMIMENT AND EXPLANATION OF ANY VIOLATIONS TYPED OR PRINTED Facilty Ponds

Plant Manager

(Reference all attachments here)

00044/961223-1801

## **ATTACHMENT 2**

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

Page Date	Flow Into Pond (MGD)	Storage Volume (thousand gallons)	Water Balance (thousand gallon)	Discharge from Pond (thousands gallons)
10/13/08		1,729		ische 75 aug. Britane von sein
10/31/08	0.0	1,729	273	0.0
11/17/08		1,729		
11/26/08	0.0	1,762	183	0.0
12/05/08		1,762		Description of Australia Applications of the Market State of the Communication of the Communi
12/12/08	0.0	1,762	105	0.0

Table 2a - Mn-1 Pond Leak Detection Monitoring

Date	Volume in Detection Well (gallons pumped)
10/13/08	0.0
10/31/08	0.0
11/17/08	0.0
11/26/08	0.0
12/05/08	0.0
12/12/08	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 (Ihousand gallons)
10/13/08		6,734	(Carlor Services Services of Carlor Services Ser	
10/31/08	0.187	7,269	-296	0.0
11/17/08		6,713		Salara (Alay Langue et again et
11/26/08	0.162	7,280	-758	0.0
12/05/08	Complete and Cold	7,459	A constitution of the	
12/12/08	0.193	7,765	462	0.0

Table 2b - WC-East Pond Leak Detection Monitoring

Table 2b - WC-East Polid Leak Detection Monitoring		
	Date	Volume in Detection Well (gallons pumped)
10/01/08	thru 10/15/08	North — 0.0
II	11	South – 0.0
10/16/08	thru 10/31/08	North – 0.0
11	11	South – 0.0
11/01/08	thru 11/15/08	North — 0.0
11	11	South – 0.0
11/16/08	thru 11/30/08	North – 0.0
Ħ	ŧI	South 0.0
12/01/08	thru 12/15/08	North – 918
II	11	South - 0.0
12/16/08	thru 12/31/08	North – 5,111
11	11	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 (Ihousands gallons)	Water Balance (thousands gallon)	Discharge from Pond (thousand gallons)
10/13/08	200000000000000000000000000000000000000	7,834		
10/31/08	- 0.012	7,912	129	0.0
11/17/08		7.970	VERSENBERGEREN STELLEN STELLE	
11/26/08	0.012	8,048	45	0.0
12/05/08		8,117		
12/12/08	0.009	8,147	145	0.0

Table 2c - WC-West Pond Leak Detection Monitoring

able 20 - 110-1163() ond Edak Detection Monitorin		
Date	Volume in Detection Well	
	(gallons pumped)	
10/13/08	North – 0.0	
10/13/08	South - 0.0	
10/31/08	North – 0.0	
10/31/08	South - 0.0	
11/17/08	North – 0.0	
11/17/08	South - 0.0	
11/26/08	North – 0.0	
11/26/08	South - 0.0	
12/05/08	North - 0.0	
12/05/08	South - 0.0	
12/12/08	North - 0.0	
12/12/08	South – 0.0	

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)
10/01/08		613		
10/15/08	0.012	698	-27	0.0
11/03/08	ALL STATE AND ST	727		The second secon
11/19/08	0.003	613	81	0.0
12/02/08		727		
12/15/08	0.003	786	149	0.0

Table 2d - AP-5 Pond Leak Detection Monitoring

Date	Volume in Detection Well
	(gallons pumped)
10/01/08	0.0
10/15/08	0.0
11/03/08	0.0
11/19/08	0.0
12/02/08	0.0
12/15/08	0.0

## **ATTACHMENT 3**

Photographs of Ponds (Labeled and Dated)

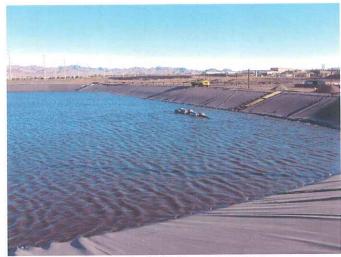


Figure 1. WC-East (1/9/09).



Figure 2. MN-1 (1/9/09).

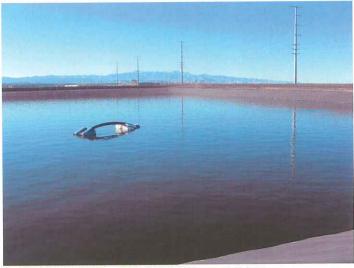


Figure 3. WC-West (1/9/09).