ENVIRON

July 22, 2011

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

Subject: Permit NEV2001515 Discharge Monitoring Report – 2nd 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.

The Trust now maintains Permit #NEV2001515 covering the synthetically double-lined GW-11 pond operation in Henderson, Nevada. No water was discharged directly from GW-11 pond to the receiving water body. However, water from GW-11 pond (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 pond operational information. Included with this correspondence are the April, May and June 2011 DMRs.

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

Sincerely,

Allan DeLorme, PE Managing Principal

Overnight Mail

Attachments

cc: Please see attached distribution sheet

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Documents\Documen

Smc/11 2nd Q GW11 Pond DMR - Environ Cvr Ltr.docx

Tronox Document Distribution List

Updated:

11-Jul-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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GWD Permit NEV2001515 - 2nd 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.

Susan Crowley
CEM 1428, expires 3-8-13

ATTACHMENT 1

Discharge Monitoring Reports



11-April DMR NEV2001515.xlsx

April 2011



11-May DMR NEV2001515.xlsx

May 2011



11-June DMR NEV2001515.xlsx

June 2011

PERMITTEE NAME/ADDRESS:

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

NAME: Nevada Environmental response Trust

Henderson, NV 89015

ADDRESS: CO Veolia Water NA 510 Fourth Street

DISCHARGE MONITORING REPORT (DMR) NEV2001515 PERMIT NUMBER

DISCHARGE NUMBER

ATTN:

Pond GW-11

FACILITY: Nevada Environmental Response Trust

LOCATION: Henderson, NV Susan Crowley

MONITORING PERIOD 11 | 06 | 01 TO 11 | 06 | 30

NO DISCHARGE X

| ATTN: Susan Crowley | | OLIA | ITITY OF LOADING | | 1 | | TE: Read instruct | ions before o | comple | eting this forr | n. | |
|--|-----------------------------------|--|--|---|-----------------------------|--------------------|--|---------------|------------|----------------------------|----------------------|--|
| PARAMETER | | QUAR | NTITY OR LOADING | | | QUALITY OR CONCE | NTRATION | | NO. | FREQUENCY | SAMPLE | |
| | | AVERAGE | MAXIMUM | UNITS | 30 Day Ave (mg/l) | 7 Day Ave (mg/l) | 30 Day Ave | UNIT EX | | OF ANALYSIS | TYPE | |
| Flow | SAMPLE MEASUREMENT | Please see at | Please see attached Table 1 | | | | | | 0 | Monthly | Flow Meter | |
| Influent | PERMIT REQUIREMENT | Monitor a | and Report | | | | | | | | Wictor | |
| Leak Detection Information | SAMPLE MEASUREMENT | | | | Please see att | ached Table 2 | pin 100 Mil 64 Jan | | 0 | Bi-Monthly | Discrete | |
| | PERMIT REQUIREMENT | | | | Monitor a | nd Report | | | | | | |
| Pond Water Level | SAMPLE MEASUREMENT | | ***** | Please see attached Table 1 | | | | 0 | Bi-Monthly | Discrete | | |
| | PERMIT REQUIREMENT | | | | Monitor a | nd Report | | | | | | |
| Storage Volume | SAMPLE MEASUREMENT | | | | Please see attached Table 1 | | | | 0 | Bi-Monthly | Calculatio | |
| | PERMIT REQUIREMENT | | | | Monitor a | nd Report | | | | | | |
| Water Balance Information | SAMPLE MEASUREMENT | | | | Please see att | ached Table 1 | | | 0 | Monthly | Calculatio | |
| | PERMIT REQUIREMENT | | | | Monitor a | nd Report | | | | | | |
| | SAMPLE MEASUREMENT | | | | | | A 1800 - 180 - 180 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - | | | | | |
| | PERMIT REQUIREMENT | | | | | | | | | | | |
| 7 | SAMPLE MEASUREMENT | | | | | | | | | | | |
| | PERMIT REQUIREMENT | | | | | | | | | | | |
| NAME / TITLE PRINCIPAL EXECUTIV | VE OFFICER | | | | / | 0 | | TELEPH | ONE | DΑ | TE | |
| Susan Crowley | I CERT DIREC PROPE PERSO | TION OR SUPERVISION IN ACCORDA ERLY GATHER AND EVALUATE THE DNS WHO MANAGE THE SYSTEM. | T THIS DOCUMENT AND ALL ATTACE NICE WITH A SYSTEM DESIGNED TO INFORMATION SUBMITTED. BASED OR THOSE PERSONS DIRECTLY | ASSURE THAT QUAL ON MY INQUIRY OF RESPONSIBLE FOR | | Muonle | n/ | , | J.11 | 57 | | |
| CEM 1428, exp 3-8-13 INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIE AND COMPLETE. I AM AWARE THAT THERE ARE GISHIFICANT PERMITTES FOR SUBMITTING INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS. | | | | EDGE AND BELLEE . | TRUE ACCURATE | 702-592-7 | 72 7 | 11 07 08 | | | | |
| TYPED OR PRINTED | | | The state of the s | | | FICER OR AUTHORIZE | D AGENT | | | | - | |
| COMMENT AND EXPLANATION OF A | NY VIOLATIONS | | (Referen | ce all attachn | | TICER OR AUTHORIZE | DABENI | AREA CODE N | | YEAR n(707)864-0845;p/n | MO DA` 11090;v5.0 | |

PERMITTEE NAME/ADDRESS:

Pond GW-11

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

| NAME: | Nevada | Environmental | response | Trust |
|-------|--------|---------------|----------|-------|
| | | | | |

ADDRESS: CO Veolia Water NA

510 Fourth Street Henderson, NV 89015

NEV2001515 PERMIT NUMBER

DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust

LOCATION: Henderson, NV ATTN: Susan Crowley

MONITORING PERIOD 11 | 05 | 01 TO 05 | 31

DISCHARGE MONITORING REPORT (DMR)

NO DISCHARGE X NOTE: Read instructions before completing this form.

| PARAMETER | | QUAN | QUANTITY OR LOADING QUALITY OR CONCENTRAT | | | | ENTRATION | | T | FREQUENCY | | |
|--------------------------------|-------------------------------|--|--|-------------------|---------------------------------------|--|---------------------------------|-------------|-----|--------------------|---------------|--|
| | | AVERAGE | MAXIMUM | UNITS | 30 Day Ave (mg/l) | 7 Day Ave (mg/l) | 30 Day Ave | UNIT | EX | OF ANALYSIS | TYPE | |
| Flow | SAMPLE MEASUREMENT | Please see at | Please see attached Table 1 | | | | | | 0 | Monthly | Flow Meter | |
| Influent | PERMIT REQUIREMENT | Monitor a | Monitor and Report | | <u></u> | | | | | | ivietei | |
| Leak Detection Information | SAMPLE MEASUREMENT | | | | Please see attached Table 2 | | | | 0 | Bi-Monthly | Discrete | |
| | PERMIT REQUIREMENT | | | | Monitor ar | nd Report | | | | | | |
| Pond Water Level | SAMPLE MEASUREMENT | mi est tel tel tel tel tel tel tel | | | Please see attached Table 1 | | | | 0 | Bi-Monthly | Discrete | |
| | PERMIT REQUIREMENT | | | | Monitor a | nd Report | | | | | | |
| Storage Volume | SAMPLE MEASUREMENT | | | | Please see att | ached Table 1 | | | 0 | Bi-Monthly | Calculation | |
| | PERMIT REQUIREMENT | | | | Monitor a | nd Report | | | | | | |
| Water Balance Information | SAMPLE MEASUREMENT | | | | | 0 | Monthly | Calculation | | | | |
| | PERMIT REQUIREMENT | | | | Monitor a | nd Report | | | | | | |
| | SAMPLE MEASUREMENT | | | | | | | | | | | |
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| 1 | SAMPLE MEASUREMENT | and the control of th | | | | | And the Control of the American | | | Same 6 and 1991 | | |
| | PERMIT REQUIREMENT | | | | | | | | | | | |
| NAME / TITLE PRINCIPAL EXECUTI | VE OFFICER | | | | | | | TELEPH | ONE | DA | TE | |
| Susan Crowley | I CERTII DIRECTI PROPER | ON OR SUPERVISION IN ACCORDA LLY GATHER AND EVALUATE THE | T THIS DOCUMENT AND ALL ATTACH NCE WITH A SYSTEM DESIGNED TO INFORMATION SUBMITTED. BASED | ASSURE THAT QUAL | FIED PERSONNEL | Munde | ٠ ٠ | | | | - | |
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| COMMENT AND EXPLANATION OF A | ANY VIOLATIONS | | (Referen | ce all attachn | | The same of the sa | V | | | n(707)864-0845;p/n | | |

PERMITTEE NAME/ADDRESS:

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

Nevada Environmental response Trust NAME:

ADDRESS: CO Veolia Water NA

510 Fourth Street Henderson, NV 89015

DISCHARGE MONITORING REPORT (DMR) NEV2001515 PERMIT NUMBER

DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust

LOCATION: Henderson, NV Susan Crowley ATTN:

MONITORING PERIOD 11 | 04 | 01 FROM TO 11 | 04 | 30

NO DISCHARGE NOTE: Read instructions before completing this form

| PARAMETER | | QUANTITY OR LOADING QUALITY OR CONCENTRATION AVERAGE MAXIMUM UNITS 30 Day Ave (mg/l) 7 Day Ave (mg/l) 30 Day | | NTRATION | | NO. | FREQUENCY | | | | |
|--|-----------------------|---|---|--|--|--------------------------------------|---|----------------------------------|----------------|--------------------|------------|
| | | | | 30 Day Ave (mg/l) | 7 Day Ave (mg/l) | 30 Day Ave | UNIT | EX. | OF ANALYSIS | TYPE | |
| Flow | SAMPLE MEASUREMENT | Please see at | Please see attached Table 1 | | | | | | 0 | Monthly | Flow |
| nfluent | PERMIT REQUIREMENT | Monitor a | Monitor and Report | | | | | | | | Meter |
| Leak Detection Information | SAMPLE MEASUREMENT | | | | Please see attached Table 2 | | | | 0 | Bi-Monthly | Discrete |
| | PERMIT REQUIREMENT | | | | Monitor ar | nd Report | | 15 15 15 15 15 15 | | | |
| Pond Water Level | SAMPLE MEASUREMENT | | | | Please see attached Table 1 | | sadora e partir de la Partir de la Carlo | | 0 | Bi-Monthly | Discrete |
| | PERMIT REQUIREMENT | | | | Monitor ar | nd Report | | | | | |
| Storage Volume | SAMPLE MEASUREMENT | | | 7 | Please see atta | ached Table 1 | | | 0 | Bi-Monthly | Calculatio |
| | PERMIT REQUIREMENT | | | | Monitor ar | nd Report | | | | | |
| Water Balance Information | SAMPLE MEASUREMENT | | | | Please see attached Table 1 | | Per l'Actrific Perce Moderni aggi | | 0 | Monthly | Calculatio |
| | PERMIT REQUIREMENT | | | | Monitor ar | nd Report | | | | | |
| | SAMPLE MEASUREMENT | | | | The second of th | | Peeulera di Edizada a sali gali gali fili | | 2.500.000 | ageograph polymen. | |
| | PERMIT REQUIREMENT | | | | | | | | | | |
| | SAMPLE MEASUREMENT | | | | | as Tacremon positive Academic pedice | Caracina (Caracina Servi) (Established) | | | | |
| | PERMIT REQUIREMENT | | | | | | | | | | |
| NAME / TITLE PRINCIPAL EXECUTI | VE OFFICER | | 200 0 Xee 0 000 200 000 At 1220 00 | | , | | | TELEPH | ONE | D 4 | TE |
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| TYPED OR PRINTED COMMENT AND EXPLANATION OF A | | OFFICER OR AUTHORIZED AGENT | | | | | | | | MO DAY | |

ATTACHMENT 2

Pond Monitoring Results





11 2nd Q GW11 current pond liner Pond Levels.xls gallons - 2nd Q 11.xls

Pond Data



GW-11 Balance - 2nd Q 11.xls

Water Balance

| 12/1/05 | 325 | 37,243 | 20,457 | 14.2 |
|----------|-------|--------|--------|------|
| 12/15/05 | 326 | 37,141 | 20,559 | 14.3 |
| 1/1/06 | 323 | 37,424 | 20,276 | 14.1 |
| 1/15/06 | 324 | 37,333 | 20,367 | 14.1 |
| 2/1/06 | 326 | 37,141 | 20,559 | 14.3 |
| 2/15/06 | 329 | 36,857 | 20,843 | 14.5 |
| 3/1/06 | 335 | 36,293 | 21,407 | 14.9 |
| 3/15/06 | 343.5 | 35,491 | 22,209 | 15.4 |
| 4/1/06 | 353 | 34,598 | 23,102 | 16.0 |
| 4/15/06 | 370 | 33,004 | 24,696 | 17.2 |
| 5/1/06 | 383.5 | 31,738 | 25,962 | 18.0 |
| 5/15/06 | 396.5 | 30,506 | 27,194 | 18.9 |
| 6/1/06 | 423 | 28,008 | 29,692 | 20.6 |
| 6/15/06 | 433 | 27,047 | 30,653 | 21.3 |
| 7/2/06 | 439 | 26,482 | 31,218 | 21.7 |

.

| GW-11 Water Balance: GWTP Totalizer Reading :00 first day of the month GWTP Totalizer Reading 12:00 last day of the month GWTP total effluent flow GWTP flow to FBR (p-103) GWTP flowtrap to GW-11 (calculated overflow back to pond) | gallons gallons Mgallons | 1-Jan-09 11352132 14312736 2.96 2.76 0.20 | 14312736 | 17009197 | 20033936 | 22899280 | 25753178 | 1-Jul-09 28552982 31400182 2.85 2.88 | 31400182 | 34248173 | 37061333 | 1-Nov-09 39939300 42831339 2.89 3.23 | 42831339 | 45674033 | 27703292 | 30534603 33090969 2.56 | 33090969 | 35849406 | 1-May-11 38557826 41280927 2.72 3.23 | 41280927 | | | | | |
|--|----------------------------------|--|----------------------------|----------------------------|------------------------------------|---------------------------|---------------------------|--|------------------------------------|---------------------------|-----------------------------------|--|-------------------------------------|---------------------------|------------------------------------|------------------------------------|---------------------------|------------------------------------|--|-----------------------------------|-----|-----|-----|---|-----|
| GW-11 to FBR P-104(new) This is the not taken out of GW-11 to the FBR for the menth Number of EQ TK101A & B overflow events/effleunt divertions Total gallons Coveriow of TK101 to GW-11 APS Transfer to GW-11 (drall includes SLW dilution water) | Mgallons Mgallons | 2.21 2.01 10 1.39 0.084 | 2.05 1.88 14 1.81 | 2.41 2.26 20 1.30 | 2.25 2.13 9 1.80 0.344 | 2.95 2.84 9 0.41 | 3.28 3.19 6 0.39 | 3.59 3.62 7 0.35 0.112 | 2.24 2.45 6 0.65 0.104 | 2.22 2.42 6 0.94 | 2.3 2.58 5 0.77 0.272 | 3.16 3.50 8 0.83 0.306 | 3.52 4.02 17 2.63 0.184 | 3.23 3.75 6 0.65 | 4.01 4.63 5 1.73 0.237 | 2.87 3.52 8 4.23 0.234 | 4.01 4.59 8 2.30 | 3.73 4.24 4 0.61 0.317 | 2.09 2.60 11 2.35 0.625 | 2.09 2.59 7 2.04 2.11 | | | | | |
| Number of GAC column back wash events Tetal-of-Backwash-for-all-GAC-columne (minutes) GAC Backwash stabilized lake used GAC-Backwash-water-to-GW-11 Sand-filler and-other-tank-hydrotesting-to-GW-11 | Mgallons | 0.614 | 0.269 | 0.35 | 0.399 | 7 0.423 | 0.777 | 0.317 | 0.227 | 7 0.28 | 0.192 | 0.21 | 5 0.319 | 0.113 | 0.222 | 0.532 | 0.484 | 0.699 | 7 | 0.335 | | | | | |
| EQ Area Sump to GW-11 D-1 Sump Flow to GW-11 Rain Fall | Mgallons Mgallons Mgallons | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | minimal | | | | | |
| Less Evaporation Total Addition to GW-11 Average Daily Additions Evap rate | Mgallons Mgallons MGD | 1.09 -0.21 -0.007 | 1.36 0.03 0.001 | -0.76 -0.025 | 3.16 0.41 0.014 | 4.35 -2.00 -0.065 | 5.00 -2.02 -0.067 | 5.12 -2.84 -0.092 | 4.58 -1.47 -0.049 | 3.55 -1.20 -0.039 | 2.42 -1.34 -0.045 | 1.36 -2.15 -0.072 | 1.01 -0.88 -0.029 | 1.09 -1.95 -0.063 | 1.33 -2.44 -0.079 | 1.42 1.47 0.053 | 2.37 -1.81 -0.058 | 2.07 -2.62 -0.087 | 2.78 0.86 0.028 | 2.78 1.89 0.063 | | | | | |
| Water Balance (in less out including evaporation) Comparison of net water addition to pond volume change | in/month Mgallons Mgallons | 3.7 -1.3 0.34 | -1.3 -0.69 | -3.1 -2.82 | 10.7 -2.76 -2.65 | 14.7 -6.35 -4.46 | 16.9 -7.02 -5.01 | 17.3 -7.96 -4.73 | 15.5 -6.05 -2.91 | -4.75 -7.01 | 8.2 -3.77 -3.20 | 4.6 -3.51 -2.62 | 3.4 -1.89 -1.47 | 3.7 -3.05 -3.16 | 4.5 -3.77 -3.56 | 4.8 0.05 1.30 | -4.18 -1.72 | 7 -4.69 0.86 | 9.4 -1.92 -0.93 | 9.4 -0.89 -2.96 | 8.6 | 9.5 | 8.5 | 7 | 5.3 |
| Trench Flow Reglithing Totalizer Trench Ricov entiting Totalizer Trench gallons injected>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>> | 791948 791948 0 | | | | | | | | | | | | | | | | | | | | | | | | |
| Interceptor flow monthly total gallons | 2,959,230 | | | | | | | | | | | | | | | | | | | | | | | | |

335,254 Table 1 – GW-11 Pond Monitoring Information

| Date | Flow Into Pond (MGD) | Storage Volume (thousand gallons) | Water Balance (million gallons) | Flow from Pond to FBR's * (thousand gallons) |
|---------|-------------------------|-----------------------------------|------------------------------------|--|
| 4-1-11 | -0.087 | 7,663 | -4.69 | 2,151 |
| 4-15-11 | | 6,917 | | 1,588 |
| 5-1-11 | 0.028 | 1,369 | -1.92 | 1,248 |
| 5-15-11 | | 1,921 | | 794 |
| 6-1-11 | 0.063 | 938 | -0.89 | 894 |
| 6-15-11 | | 2,486 | | 1,209 |

Table 2 – GW-11 Pond Leak Detection Monitoring

| 1 able 2 – GVV-11 | Pond Leak Detection Monitorin |
|-------------------|-------------------------------|
| Date | Volume in Detection Well |
| | (gallons) |
| 4-7-11 | SE – Dry |
| " | SW – Dry |
| ű | NW – Dry |
| « | NE – Dry |
| 4-21-11 | SE – Dry |
| (í | SW - 110 |
| " | NW – Dry |
| ((| NE – Dry |
| 5-5-11 | SE – Dry |
| " | SW – Dry |
| " | NW – Dry |
| " | NE – Dry |
| 5-19-11 | SE – Dry |
| í. | SW – 75 |
| u | NW – Dry |
| (í | NE – Dry |
| 6-2-11 | SE – Dry |
| íí. | SW – Dry |
| " | NW – Dry |
| " | NE – Dry |
| 6-16-11 | SE – Dry |
| (f | SW – Dry |
| (f | NW – Dry |
| " | NE – Dry |