

TRONOX

William K. Taylor
Production Manager

(702) 651-2235
Fax (702) 651-2310
bill.taylor@tronox.com

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

PERMITTEE NAME/ADDRESS: **Tronox LLC**
 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
 NAME: **Tronox LLC**
 ADDRESS: **PO BOX 5E**
HENDERSON, NV 89009-7000

PERMIT NUMBER: **NEV2001516**
 DISCHARGE NUMBER: **001**

MONITORING PERIOD
 FROM **08 | 07 | 01** TO **08 | 07 | 31**

NO DISCHARGE

NOTE: Read instructions before completing this form.

PARAMETER	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)			
Flow	SAMPLE MEASUREMENT PERMIT REQUIREMENT	Please see attached Table 1	MGD	-----	-----	0	Monthly	Flow Meter
	Influent	Monitor and Report		-----	-----			
Leak Detection Information	SAMPLE MEASUREMENT PERMIT REQUIREMENT	-----		Please see attached Table 2	-----	0	Bi-Monthly	Discrete
		Monitor and Report		Monitor and Report				
Pond Water Level	SAMPLE MEASUREMENT PERMIT REQUIREMENT	-----		Please see attached Table 1	-----	0	Bi-Monthly	Discrete
		Monitor and Report		Monitor and Report				
Storage Volume	SAMPLE MEASUREMENT PERMIT REQUIREMENT	-----		Please see attached Table 1	-----	0	Bi-Monthly	Calculation
		Monitor and Report		Monitor and Report				
Water Balance Information	SAMPLE MEASUREMENT PERMIT REQUIREMENT	-----		Please see attached Table 1	-----	0	Monthly	Calculation
		Monitor and Report		Monitor and Report				
NAME / TITLE: PRINCIPAL EXECUTIVE OFFICER	SAMPLE MEASUREMENT PERMIT REQUIREMENT							
	William K. Taylor							TELEPHONE
TYPED OR PRINTED Production Manager	SAMPLE MEASUREMENT PERMIT REQUIREMENT							DATE
								702-651-2200
COMMENT AND EXPLANATION OF ANY VIOLATIONS Facility Ponds	SAMPLE MEASUREMENT PERMIT REQUIREMENT							AREA CODE NUMBER
								8 10 27
								YEAR MO DAY
								Form by WinSawChem(7/7)864-0845;em11090;v5.01;4/1/96

(Signature)
 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

(Reference all attachments here)

PERMITTEE NAME/ADDRESS: Tronox LLC
 NAME: Tronox LLC
 ADDRESS: PO BOX 5E
 HENDERSON, NV 89009-7000

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 DISCHARGE MONITORING REPORT (DMR)
 NEV2001516
 PERMIT NUMBER
 001
 DISCHARGE NUMBER

MONITORING PERIOD
 FROM 08 | 08 | 01 TO 08 | 08 | 31
 NO DISCHARGE

NOTE: Read instructions before completing this form.

PARAMETER	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)			
Flow Influent	SAMPLE MEASUREMENT PERMIT REQUIREMENT	Please see attached Table 1	MGD	-----	-----	0	Monthly	Flow Meter
	SAMPLE MEASUREMENT PERMIT REQUIREMENT	Monitor and Report		-----	-----			
Leak Detection Information	SAMPLE MEASUREMENT PERMIT REQUIREMENT	-----		Please see attached Table 2	-----	0	Bi-Monthly	Discrete
	SAMPLE MEASUREMENT PERMIT REQUIREMENT	Monitor and Report		Monitor and Report				
Pond Water Level	SAMPLE MEASUREMENT PERMIT REQUIREMENT	-----		Please see attached Table 1	-----	0	Bi-Monthly	Discrete
	SAMPLE MEASUREMENT PERMIT REQUIREMENT	Monitor and Report		Monitor and Report				
Storage Volume	SAMPLE MEASUREMENT PERMIT REQUIREMENT	-----		Please see attached Table 1	-----	0	Bi-Monthly	Calculation
	SAMPLE MEASUREMENT PERMIT REQUIREMENT	Monitor and Report		Monitor and Report				
Water Balance Information	SAMPLE MEASUREMENT PERMIT REQUIREMENT	-----		Please see attached Table 1	-----	0	Monthly	Calculation
	SAMPLE MEASUREMENT PERMIT REQUIREMENT	Monitor and Report		Monitor and Report				
	SAMPLE MEASUREMENT PERMIT REQUIREMENT							
	SAMPLE MEASUREMENT PERMIT REQUIREMENT							
NAME / TITLE PRINCIPAL EXECUTIVE OFFICER William K. Taylor Production Manager TYPED OR PRINTED						TELEPHONE		DATE
						702-651-2200		08 10 27
COMMENT AND EXPLANATION OF ANY VIOLATIONS Facility Ponds					AREA CODE NUMBER		YEAR MO DAY	
					702-651-2200		08 10 27	

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 OBTAIN AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSONS OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS TRUE AND ACCURATE AND I AM NOT PROVIDING ANY SIGNIFICANT FACTS FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

(Reference all attachments here)

00044/961223-1801

Forms by WindowChem(707)864-0645;pm11095v5.01;4/1/96

PERMITTEE NAME/ADDRESS: Tronox LLC
 NAME: Tronox LLC
 ADDRESS: PO BOX 5F
 HENDERSON, NV 89009-7000

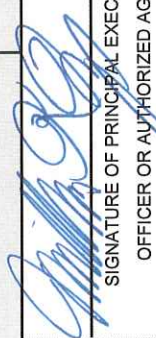
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 DISCHARGE MONITORING REPORT (DMR)
 NEV2001516
 PERMIT NUMBER
 001
 DISCHARGE NUMBER

FACILITY: Tronox LLC
 LOCATION: Henderson, NV
 Attn: Michael Skromyda

MONITORING PERIOD
 FROM 08 | 09 | 01 TO 08 | 09 | 30

NO DISCHARGE

NOTE: Read instructions before completing this form.

PARAMETER	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)			
Flow	SAMPLE MEASUREMENT	Please see attached Table 1	MGD	Please see attached Table 2	-----	-----	Monthly	Flow Meter
	PERMIT REQUIREMENT							
Leak Detection Information	SAMPLE MEASUREMENT	-----	Monitor and Report	Please see attached Table 2	-----	0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT	-----						
Pond Water Level	SAMPLE MEASUREMENT	-----	Monitor and Report	Please see attached Table 1	-----	0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT	-----						
Storage Volume	SAMPLE MEASUREMENT	-----	Monitor and Report	Please see attached Table 1	-----	0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT	-----						
Water Balance Information	SAMPLE MEASUREMENT	Please see attached Table 1	Monitor and Report	Please see attached Table 1	-----	0	Monthly	Calculation
	PERMIT REQUIREMENT							
	SAMPLE MEASUREMENT							
	PERMIT REQUIREMENT							
	SAMPLE MEASUREMENT							
	PERMIT REQUIREMENT							
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 THESE PERSONS DIRECTLY AND BELIEVE THE ACTUATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.								
NAME / TITLE PRINCIPAL EXECUTIVE OFFICER			SIGNATURE OF PRINCIPAL EXECUTIVE			TELEPHONE		
William K. Taylor						702-651-2200		
Production Manager			OFFICER OR AUTHORIZED AGENT			AREA CODE NUMBER		
TYPED OR PRINTED						YEAR MO DAY		
						08 10 27		

COMMENT AND EXPLANATION OF ANY VIOLATIONS
 Facility Ponds
 (Reference all attachments here)

ATTACHMENT 2

**Pond Monitoring
Results**

Table 1a – Mn-1 Pond Monitoring Information

Date	Flow Into Pond (MGD)	Storage Volume (thousand gallons)	Water Balance (thousand gallon)	Discharge from 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	Volume in Detection Well (gallons pumped)
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

Date	Flow Into Pond (MGD)	Storage Volume (thousand gallons)	Water Balance (thousand gallon)	Discharge from Pond (thousand gallons)
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		
9/26/08	0.149	6,849	-47	0

Table 2b – WC-East Pond Leak Detection Monitoring

Note: 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

Table 1c – WC-West Pond Monitoring Information

Date	Flow Into Pond (MGD)	Storage Volume (thousands gallons)	Water Balance (thousands gallon)	Discharge from Pond (thousand gallons)
7/14/08		8,626		
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 2c – WC-West Pond Leak Detection Monitoring

Date	Volume in Detection Well (gallons pumped)
7/14/08	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
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		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	Volume in Detection Well (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