

TRONOX

Fredrick R. Stater
Plant Manager

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April 27, 2009

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

SUBJECT: First Quarter 2009 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.

During the first part of this quarter, the automatic leak collection sump pump in WC-East Pond recorded gradual increases in collection rates, as the level in pond increased. Later in the quarter, as the level in WC-East dropped, a noted decrease in the leak collection rate was recorded. Based on semi-monthly data, the maximum collection rate recorded was 0.78 gpm (16,759 gals. over semi-monthly period, see Table 2b.).

Having a level indication in the leak collection sump along with pump flow meter is proving helpful for monitoring and identifying possible leaks between the primary and secondary liners. Preliminary data collected indicates the bottom of the pond does not have any leaks but leakage is suspected in a few areas along the sloped pond banks. The suspected areas have been noted, a pond liner repair company has been contacted and repairs have been tentatively scheduled for this fall, when the pond level is below the level where initial 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

Tronox. Adding value beyond the product.

ATTACHMENT 1

**Discharge Monitoring
Reports**

January 2009

February 2009

March 2009

PERMITTEE NAME/ADDRESS: NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 NAME: Tronox LLC DISCHARGE MONITORING REPORT (DMR)
 ADDRESS: PO BOX 55 HENDERSON, NV 89009-7000
 PERMIT NUMBER: NEV2001516
 DISCHARGE NUMBER: 001

FACILITY: Tronox LLC
 LOCATION: Henderson, NV
 Attn: Fredrick R. Stater

MONITORING PERIOD
 FROM 09 | 01 | 01 TO 09 | 01 | 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	Please see attached Table 1	MGD				Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report						
Leak Detection Information	SAMPLE MEASUREMENT			Please see attached Table 2		0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT			Monitor and Report				
Pond Water Level	SAMPLE MEASUREMENT			Please see attached Table 1		0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT			Monitor and Report				
Storage Volume	SAMPLE MEASUREMENT			Please see attached Table 1		0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT			Monitor and Report				
Water Balance Information	SAMPLE MEASUREMENT			Please see attached Table 1		0	Monthly	Calculation
	PERMIT REQUIREMENT			Monitor and Report				
	SAMPLE MEASUREMENT							
	PERMIT REQUIREMENT							
	SAMPLE MEASUREMENT							
	PERMIT REQUIREMENT							
NAME / TITLE PRINCIPAL EXECUTIVE OFFICER					TELEPHONE		DATE	
Fredrick R. Stater					702-651-2200		09 04 27	
Plant Manager		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER			AREA CODE NUMBER		YEAR MO DAY	
TYPED OR PRINTED		OFFICER OR AUTHORIZED AGENT			702-651-2200		09 04 27	

COMMITTEE 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 THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

(Reference all attachments here)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

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


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

MONITORING PERIOD
 FROM **09 | 02 | 01** TO **09 | 02 | 28**

NO DISCHARGE

NOTE: Read instructions before completing this form.

FACILITY: Tronox LLC
 LOCATION: Henderson, NV
 Attn: Fredrick R. Stater

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	Please see attached Table 1	MGD	-----	-----	-----	Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report		-----	-----			
Leak Detection Information	SAMPLE MEASUREMENT	-----		Please see attached Table 2	-----	0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT			Monitor and Report				
Pond Water Level	SAMPLE MEASUREMENT	-----		Please see attached Table 1	-----	0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT			Monitor and Report				
Storage Volume	SAMPLE MEASUREMENT	-----		Please see attached Table 1	-----	0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT			Monitor and Report				
Water Balance Information	SAMPLE MEASUREMENT			Please see attached Table 1	-----	0	Monthly	Calculation
	PERMIT REQUIREMENT			Monitor and Report				
	SAMPLE MEASUREMENT							
	PERMIT REQUIREMENT							
	SAMPLE MEASUREMENT							
	PERMIT REQUIREMENT							
NAME / TITLE PRINCIPAL EXECUTIVE OFFICER		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT			TELEPHONE		DATE	
Fredrick R. Stater					702-651-2200		09 04 27	
Plant Manager		OFFICER OR AUTHORIZED AGENT			AREA CODE NUMBER		YEAR MO DAY	
TYPED OR PRINTED								

CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION AND THAT I AM AWARE OF THE CONTENTS AND ACCURACY OF THE INFORMATION SUBMITTED. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

(Reference all attachments here)

COMMENT AND EXPLANATION OF ANY VIOLATIONS
 Facility Ponds

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

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

FACILITY: Tronox LLC
 LOCATION: Henderson, NV
 Attn: Fredrick R. Stater

MONITORING PERIOD
 FROM 09 | 03 | 01 TO 09 | 03 | 31

NO DISCHARGE X

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	Please see attached Table 1		MGD			Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report						
Leak Detection Information	SAMPLE MEASUREMENT	-----			Please see attached Table 2	0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT				Monitor and Report			
Pond Water Level	SAMPLE MEASUREMENT	-----			Please see attached Table 1	0	Bi-Monthly	Discrete
	PERMIT REQUIREMENT				Monitor and Report			
Storage Volume	SAMPLE MEASUREMENT	-----			Please see attached Table 1	0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT				Monitor and Report			
Water Balance Information	SAMPLE MEASUREMENT				Please see attached Table 1	0	Monthly	Calculation
	PERMIT REQUIREMENT				Monitor and Report			
	SAMPLE MEASUREMENT							
	PERMIT REQUIREMENT							
NAME / TITLE PRINCIPAL EXECUTIVE OFFICER						TELEPHONE		
	Fredrick R. Stater		SIGNATURE OF PRINCIPAL EXECUTIVE			702-651-2200		
Plant Manager		OFFICER OR AUTHORIZED AGENT			AREA CODE NUMBER			
TYPED OR PRINTED					YEAR MO DAY			
					09 04 27			

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION AND 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 THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

(Reference all attachments here)

COMMENT AND EXPLANATION OF ANY VIOLATIONS
 Facility Ponds

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)
01/09/09		1,763		
01/23/09	0.000	1,763	119	0.0
02/13/09		1,763		
02/25/09	0.001	1,795	119	0.0
03/09/09		1,795		
03/18/09	0.000	1,763	263	0.0

Table 2a – Mn-1 Pond Leak Detection Monitoring

Date	Volume in Detection Well (gallons pumped)
01/09/09	0.0
01/23/09	0.0
02/13/09	0.0
02/25/09	0.0
03/09/09	0.0
03/18/09	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 (thousand gallons)
01/09/09		9,726		
01/23/09	0.199	9,650	-857	0.0
02/13/09		9,325		
02/25/09	0.211	10,290	-682	0.0
03/09/09		10,109		
03/18/09	0.165	9,827	-1,079	0.0

Table 2b – WC-East Pond Leak Detection Monitoring

Date	Volume in Detection Well (gallons pumped)
01/01/09 thru 01/15/09	North – 13,848
" " "	South – 0.0
01/16/09 thru 01/31/09	North – 16,759
" " "	South – 0.0
02/01/09 thru 02/15/09	North – 11,176
" " "	South – 0.0
02/16/09 thru 02/28/09	North – 10,774
" " "	South – 0.0
03/01/09 thru 03/15/09	North – 12,282
" " "	South – 0.0
03/16/09 thru 03/31/09	North – 1,813
" " "	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 (thousands gallons)	Water Balance (thousands gallon)	Discharge from Pond (thousand gallons)
01/09/09		8,325		
01/23/09	0.009	8,365	103	0.0
02/13/09		8,505		
02/25/09	0.011	8,525	72	0.0
03/09/09		8,565		
03/18/09	0.014	8,545	117	0.0

Table 2c – WC-West Pond Leak Detection Monitoring

Date	Volume in Detection Well (gallons pumped)
01/09/09	North – 0.0
01/09/09	South – 0.0
01/23/09	North – 0.0
01/23/09	South – 0.0
02/13/09	North – 0.0
02/13/09	South – 0.0
02/25/09	North – 0.0
02/25/09	South – 0.0
03/09/09	North – 0.0
03/09/09	South – 0.0
03/18/09	North – 0.0
03/18/09	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)
01/01/09		712		
01/15/09	0.002	670	121	0.0
02/02/09		712		
02/15/09	0.000	741	129	0.0
03/03/09		741		
03/17/09	0.004	698	-59	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