

# 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

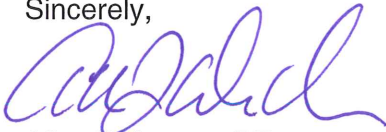
Subject: Permit NEV2001515 Discharge Monitoring Report – 2nd Quarter 2011

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](mailto:smcrowley@cox.net). Thank you.

Sincerely,



Allan DeLorme, PE  
Managing Principal

Overnight Mail

Attachments

cc: Please see attached distribution sheet



C:\smc\My  
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 \*

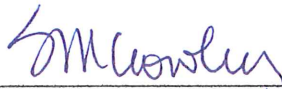
\* Cover letter includes everything but the analytical reports on CD (Data) - and is reproduced in a 2-sided transmittal

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Knox	Craig	Environ		X	
Gibson	Jeff	AmPac			
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Sahu	Rahnijit	BMI			
Crouse	George	Syngenta			
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Gibson	Jeff	AmPac			
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Wilkinson	Craig	Timet			
Mack	Joel	Montrose Counsel			

GWD Permit NEV2001515 – 2<sup>nd</sup> 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.



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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:

NAME: Nevada Environmental response Trust  
 ADDRESS: CO Veolia Water NA  
 510 Fourth Street  
 Henderson, NV 89015

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust  
 LOCATION: Henderson, NV  
 ATTN: Susan Crowley

MONITORING PERIOD	
FROM 11   06   01	TO 11   06   30

NO DISCHARGE

NOTE: Read instructions before completing this form.

PARAMETER	SAMPLE MEASUREMENT / PERMIT REQUIREMENT	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)	30 Day Ave (lb/day)	UNIT			
Flow Influent	SAMPLE MEASUREMENT	Please see attached Table 1		MGD	-----	-----	-----		0	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  
**Susan Crowley**  
 CEM 1428, exp 3-8-13  
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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 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.

*Susan Crowley*  
 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: 702-592-7727  
 DATE: 11 | 07 | 08  
 AREA CODE NUMBER: YEAR MO DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS  
 Pond GW-11

(Reference all attachments here)

Forms by WindowChem(707)864-0845;p/n11090;v5.01;4/1/96

PERMITTEE NAME/ADDRESS:

NAME: Nevada Environmental response Trust  
 ADDRESS: CO Veolia Water NA  
 510 Fourth Street  
 Henderson, NV 89015

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

**DISCHARGE MONITORING REPORT (DMR)**

NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust  
 LOCATION: Henderson, NV  
 ATTN: Susan Crowley

MONITORING PERIOD	
FROM 11   05   01	TO 11   05   31

NO DISCHARGE

NOTE: Read instructions before completing this form.

PARAMETER	SAMPLE MEASUREMENT / PERMIT REQUIREMENT	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE	
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	PERMIT REQUIREMENT											

NAME / TITLE PRINCIPAL EXECUTIVE OFFICER  
**Susan Crowley**  
**CEM 1428, exp 3-8-13**  
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*Susan Crowley*  
 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: 702-592-7727  
 DATE: 11 | 07 | 08  
 AREA CODE NUMBER: YEAR MO DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS  
 Pond GW-11

(Reference all attachments here)

Forms by WindowChem(707)864-0845;p/n11090;v.5.01;4/1/86

PERMITTEE NAME/ADDRESS:

NAME: Nevada Environmental response Trust  
 ADDRESS: CO Veolia Water NA  
 510 Fourth Street  
 Henderson, NV 89015

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

**DISCHARGE MONITORING REPORT (DMR)**

NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust  
 LOCATION: Henderson, NV  
 ATTN: Susan Crowley

MONITORING PERIOD	
FROM 11   04   01	TO 11   04   30

NO DISCHARGE

NOTE: Read instructions before completing this form.

PARAMETER	SAMPLE MEASUREMENT / PERMIT REQUIREMENT	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
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	PERMIT REQUIREMENT	Monitor and Report									
	SAMPLE MEASUREMENT										
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	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME / TITLE PRINCIPAL EXECUTIVE OFFICER

**Susan Crowley**

**CEM 1428, exp 3-8-13**

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*Susan Crowley*  
 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

702-592-7727

11 | 07 | 08

AREA CODE NUMBER

YEAR MO DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS  
 Pond GW-11

(Reference all attachments here)

Forms by WindowChem(707)864-0845;p/n11090;v5.01;4/1/96

## ATTACHMENT 2

### Pond Monitoring Results



11 2nd Q GW11  
Pond Levels.xls



current pond liner  
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



**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**

Date	Volume in Detection Well (gallons)
4-7-11	SE – Dry
“	SW – Dry
“	NW – Dry
“	NE – Dry
4-21-11	SE – Dry
“	SW – 110
“	NW – Dry
“	NE – Dry
5-5-11	SE – Dry
“	SW – Dry
“	NW – Dry
“	NE – Dry
5-19-11	SE – Dry
“	SW – 75
“	NW – Dry
“	NE – Dry
6-2-11	SE – Dry
“	SW – Dry
“	NW – Dry
“	NE – Dry
6-16-11	SE – Dry
“	SW – Dry
“	NW – Dry
“	NE – Dry