ENVIRON

January 23, 2012

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

Subject: Permit NEV2001515 Discharge Monitoring Reports – 4th 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. Additionally, this permit was renewed, effective July 7, 2011 and includes ponds GW-11 and AP-5, both associated with the continuing Henderson perchlorate remedial efforts.

As indicated, the Trust maintains Permit #NEV2001515 which covers the synthetically double-lined ponds GW-11 and AP-5. No water was discharged directly to a receiving water body from either GW-11 or AP-5 pond. However, water from both GW-11 and AP-5 ponds (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 the ponds' operational information. Included with this correspondence are the October, November and December 2011 DMRs. Also included with this fourth quarter report are pictures of both GW-11 pond and AP-5 pond.

Please note that AP-5 pond's top liner has a tear at the top edge of the pond, which is well above the liquid level of the pond contents. The pond is a synthetically double-lined pond and there is no evidence that the underlying liner has been compromised. In addition, the monitoring well which is located between the top liner and the bottom liner to collect any water which accumulates between the liners, has not shown evidence of water presence. The split top liner has been sandbagged to prevent a strong breeze from lifting the edges and the top liner tear will be closely monitored.

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, P.E. Managing Principal

Overnight Mail Attachments Compliance Coordinator January 23, 2012 Page 2

CC:

Please see attached distribution sheet

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Documents\Documen

Smc/11 4th Q Pond DMR - Environ Cvr Ltr.docx

Tronox Document Distribution List

Updated:

20-Oct-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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Bellotti	Michael	Olin			
Wilkinson	Craig	Timet			
Mack	Joel	Montrose Counsel			

Discharge Permit NEV2001515 – 4th 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-October DMR NEV2001515.xlsx

October 2011

11-November DMR NEV2001515.xlsx

November 2011

11-December DMR NEV2001515.xlsx

December 2011

PERMITTEE NAME/ADDRESS:

NAME:

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

Nevada Environmental response Trust

ADDRESS: CO Veolia Water NA

510 Fourth Street

Henderson, NV 89015

FACILITY: Nevada Environmental Response Trust

LOCATION: Henderson, NV ATTN: Susan Crowley

DISCHARGE MONITORING REPORT (DMR) NEV2001515 PERMIT NUMBER

001 DISCHARGE NUMBER

MONITORING PERIOD

FROM 11 | 10 | 01 | TO 11 | 10 | 31

NO DISCHARGE X

NOTE: Read instructions before completing this form.

PARAMETER		QUAN	ITITY OR LOADING			QUALITY OR CONCE	NTRATION		T	FREQUENCY	1
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COMMENT AND EXPLANATION OF ANY VIOLATIONS Ponds GW-11 and AP-5

(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

FACILITY: Nevada Environmental Response Trust

LOCATION: Henderson, NV Susan Crowley ATTN:

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

NEV2001515 PERMIT NUMBER

001 DISCHARGE NUMBER

MONITORING PERIOD

FROM 11 | 11 | 01 | 11 | 30 TO 11 |

NO DISCHARGE X

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COMMENT AND EXPLANATION OF ANY VIOLATIONS Ponds GW-11 and AP-5

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PAGE 1 OF 1

PERMITTEE NAME/ADDRESS:

NAME:

FACILITY:

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

Nevada Environmental response Trust

ADDRESS: CO Veolia Water NA 510 Fourth Street

Henderson, NV 89015

Nevada Environmental Response Trust

LOCATION: Henderson, NV ATTN: Susan Crowley

DISCHARGE MONITORING REPORT (DMR) NEV2001515 PERMIT NUMBER

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NO DISCHARGE X

NOTE: Read instructions before completing this form. QUANTITY OR LOADING QUALITY OR CONCENTRATION PARAMETER NO. FREQUENCY SAMPLE 30 Day Ave EX OF **AVERAGE** MAXIMUM UNITS TYPE 30 Day Ave (mg/l) 7 Day Ave (mg/l) UNIT ANALYSIS (lb/day) SAMPLE Flow Flow Please see attached Table 1 MGD MEASUREMENT Monthly <u>Meter</u> PERMIT Influent Monitor and Report REQUIREMENT SAMPLE Leak Detection Information Please see attached Table 2 MEASUREMENT Bi-Monthly Discrete PERMIT Monitor and Report REQUIREMENT SAMPLE Pond Water Level Please see attached Table 1 MEASUREMENT 0 Bi-Monthly Discrete PERMIT REQUIREMENT Monitor and Report SAMPLE Storage Volume Please see attached Table 1 MEASUREMENT Bi-Monthly Calculation PERMIT Monitor and Report REQUIREMENT SAMPLE Water Balance Information Please see attached Table 1 MEASUREMENT Monthly Calculation PERMIT Monitor and Report REQUIREMENT SAMPLE MEASUREMENT PERMIT REQUIREMENT SAMPLE MEASUREMENT PERMIT REQUIREMENT NAME / TITLE PRINCIPAL EXECUTIVE OFFICER TELEPHONE DATE CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY Susan Crowley DECEMBENT PRINCIPOR AND THE DECUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MIX DECEMBENT OF THE PROPERTY OF 12 01 23 CEM 1428, exp 3-8-13 SIGNATURE OF PRINCIPAL EXECUTIVE 11 10 | 20 702-592-7727 TYPED OR PRINTED OFFICER OR AUTHORIZED AGENT AREA CODE NUMBER YEAR MO DAY Forms by WindowChem(707)864-0845;p/n11090;v5.01;4/1/96

COMMENT AND EXPLANATION OF ANY VIOLATIONS Ponds GW-11 and AP-5

(Reference all attachments here)

00044/961223-1801

PAGE 1 OF 1

ATTACHMENT 2

Pond Monitoring Results

11 4th Q GW11 Pond current pond liner Levels.xls gallons - 4th Q 11.xls

GW-11 Pond Data

GW-11 Balance - 4th Q 11.xls

GW-11 Water Balance





11 4th Q - AP-5 Pond OnM Manual for NEV Data - Level and Leal 2001516 - Sept 2006

AP-5 Pond Data







AP5 Balance - Oct 11.xls AP5 Balance - Nov 11.xls AP5 Balance - Dec 11.xls

AP-5 Water Balance

Table 1a – GW-11 Pond Monitoring Information

Date	Flow Into Pond (MGD)	Pond Level (feet)	Storage Volume (thousand gallons)	Water Balance (million gallons)	Flow from Pond to FBR's
					(thousand gallons)
10-1-11	0.03	0.89	3,232	-1.13	443
10-15-11		1.48	5,312		1,514
11-1-11	0.076	0.89	3,232	0.80	420
11-15-11		1.5	5.402		612
12-1-11	-0.111	2.27	8,963	-4.89	1,728
12-15-11		1.74	6,250		2,122

Table 1b – AP-5 Pond Monitoring Information

Date	Flow Into Pond (MGD)	Pond Level (feet)	Storage Volume (thousand gallons)	Water Balance (million gallons)	Flow from Pond to FBR's * (thousand gallons)
10-3-11	0.02	4.92	517	-0.086	312
10-17-11		5.58	613		0
11-2-11	0.06	5.67	627	-0.17	297
11-16-11		5.50	599		1,186
12-1-11	0.02	6.33	741	-0.25	438
12-15-11	11 TAL	5.92	670		0

Table 2a - GW-11 Pond Leak Detection Monitoring

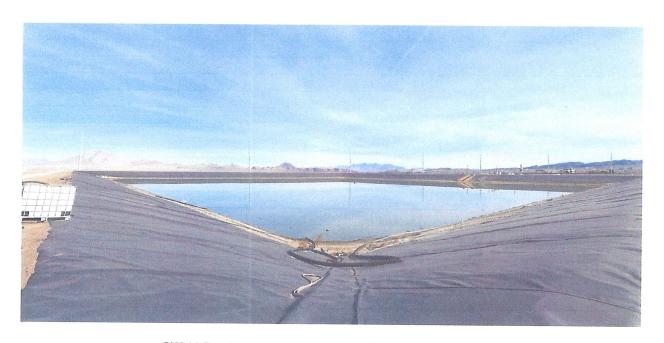
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Date	Volume in Detection Well
	(gallons)
10-6-11	NW – Dry
u	NE – Dry
"	SW – Dry
u	SE – Dry
10-20-11	NW – Dry
u	NE – Dry
и	SW – Dry
u	SE Dry
11-3-11	NW – Dry
и	NE – Dry
и	SW – Dry
и	SE – Dry
11-17-11	NW – Dry
ű	NE – Dry
и	SW – Dry
и	SE – Dry
12-1-11	NW – Dry
tt	NE – Dry
tt	SW – Dry
tt	SE – Dry
12-15-11	NW – Dry
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Table 2b - AP-5 Pond Leak Detection Monitoring

Date	Volume in Detection Well
	(gallons)
10-3-11	Dry -
10-17-11	Dry
11-2-11	Dry
11-16-11	Dry
12-1-11	Dry
12-15-11	Dry

ATTACHMENT 3

Annual Pond Pictures



GW-11 Pond December 2011 - from SW Corner Looking NE



AP-5 Pond December 2011 – from SW Corner Looking NE