

March 7, 2011

Mr. Roberto Puga, Trustee
Texas Custodial Trust
One Pointe Drive, Suite 320
Brea, CA 92821

Project No. 0118148

Environmental
Resources
Management

15810 Park Ten Place
Suite 300
Houston, Texas 77084-5140
(281) 600-1000
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Subject: February 2011 Dust Monitoring Summary

Dear Mr. Puga:

Environmental Resources Management Southwest, Inc. (ERM) performed dust monitoring activities at the ASARCO El Paso site during February 2011. Total dust data was collected from seven monitoring locations around the perimeter of the site (Figure 1) when field work with the potential to generate dust was performed on site. Field activities took place Monday through Friday with the exception of:



- February 2nd through 4th - Dust data was not collected on site due to inclement weather (freezing temperatures, snow and ice) and the potential for damage to the monitoring equipment in such conditions. During this time, limited field activities were conducted, and the field activities did not have the potential to generate significant amounts of dust.
- February 17th through February 22nd - Field activities were temporarily shut down on site. Fence line dust monitoring data was not collected during the temporary shut down.

Daily average total dust concentrations were below the sentinel value of 43 $\mu\text{g}/\text{m}^3$ for all dust monitoring locations during February with the exception of:

- February 8th - All fence line monitoring locations reported elevated total dust data due to dust storms in the area. The dust storms caused reduced visibility on and off site.
- February 14th - The North and West monitoring locations reported elevated total dust data. The elevated data is attributed to smoke migrating onto the Site from nearby grass fires not associated with the project Site.
- February 25th - The North monitoring location erroneously reported elevated data due to equipment failure. In addition, had the equipment worked properly, the readings would not be attributed to site activities because the monitoring location was generally upwind or crosswind of site activities.

A summary of the elevated data is provided in Table 1, and weekly data summary sheets are provided in Table 2. Meteorological data is provided in Table 3.

Sincerely,

Environmental Resources Management Southwest, Inc.


Amy McDonald
ERM Asarco Project Team Member

AM/skd
Attachments

cc: MALCOLM Pirnie Asarco Project Team

Figure
Attachment 1

March 7, 2011
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Figure 1
Texas Custodial Trust
Former Asarco Smelter Site
El Paso, Texas

Fence Line Dust Monitoring Locations



For monitoring locations during February 2011.

Tables
Attachment 2

March 7, 2011
Project No. 0118148

Environmental Resources Management Southwest, Inc.
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TABLE 1

February Perimeter Dust Monitor Data Exceedance Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Except as noted below, daily average total dust readings were below the site-specific internal sentinel value of 43 ug/m³.
Explanation of data values above sentinel values. See individual data sheets for weekly values listed by week-end date.

Date	Location	Wind Direction	Value (ug/m ³)	Comments	Action
2/8/2011	All	Winds in the afternoon were generally above 20 mph and from the West	70 - 119	Significant dust storm occurred during the day limiting visibility on site and railroad crews working east of site generated dust.	No field modifications necessary
2/14/2011	North	Wind speed was generally below 10 mph and wind direction changed throughout the day.	45	Heavy smoke from several large grass fires west of the Site was observed migrating onto the Site. Work on the adjacent railroad east of the Site also generated dust.	No field modifications necessary
2/14/2011	West	Wind speed was generally below 10 mph and wind direction changed throughout the day.	61	Heavy smoke from several large grass fires west of the Site was observed migrating onto the Site. Work on the adjacent railroad east of the Site also generated dust.	No field modifications necessary
2/25/2011	North	Wind direction changed from northeast in the morning to northwest in the afternoon and was generally less than 10mph.	56	Equipment malfunctioned and reported erroneous results. The North monitoring location was generally upwind or crosswind of site activities.	No field modifications necessary

TABLE 2

February Fence Line Dust Monitoring Data Weekly Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending February 5th							
Date	Tuesday, February 01, 2011	Wednesday, February 02, 2011	Thursday, February 03, 2011	Friday, February 04, 2011	Saturday, February 05, 2011		
Location	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	
South	21						
East	19						
North	26						
Northeast	22						
Northwest	22						
Calavera	26						
West	21						

Week ending February 12th							
Date	Sunday, February 06, 2011	Monday, February 07, 2011	Tuesday, February 08, 2011	Wednesday, February 09, 2011	Thursday, February 10, 2011	Friday, February 11, 2011	Saturday, February 12, 2011
Location	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)
South		18	95	9	16	16	
East		17	109	12	15	27	
North		15	70	21	19	21	
Northeast		18	119	21	26	23	
Northwest		19	85	24	28	18	
Calavera		15	96	18	<i>Malfunction</i>	18	
West		14	83	10	16	18	

Week ending February 19th							
Date	Sunday, February 13, 2011	Monday, February 14, 2011	Tuesday, February 15, 2011	Wednesday, February 16, 2011	Thursday, February 17, 2011	Friday, February 18, 2011	Saturday, February 19, 2011
Location	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)
South		33	5	18			
East		38	25	28			
North		45	13	17			
Northeast		42	20	26			
Northwest		42	14	42			
Calavera		42	22	25			
West		61	15	24			

Week ending February 26th							
Date	Sunday, February 20, 2011	Monday, February 21, 2011	Tuesday, February 22, 2011	Wednesday, February 23, 2011	Thursday, February 24, 2011	Friday, February 25, 2011	Saturday, February 26, 2011
Location	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)
South				<i>Malfunction</i>	11	6	
East				3	16	8	
North				<i>Malfunction</i>	8	56	
Northeast				13	14	9	
Northwest				7	20	7	
Calavera				9	20	15	
West				7	22	8	

Week ending March 5th			
Date	Sunday, February 27, 2011	Monday, February 28, 2011	
Location	Avg. Total Dust (ug/m ³)	Avg. Total Dust (ug/m ³)	
South		15	
East		13	
North		12	
Northeast		12	
Northwest		21	
Calavera		12	
West		14	

NOTES:

- Readings indicate total dust based on direct read monitoring from Thermo Anderson MIE DATARAM 4000 equipment.
- Gray cell indicates that a dust monitor was not stationed at that location.
- Blue cell indicates that the meter malfunctioned at that location.

TABLE 3

February Meteorological Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Time	Wind Direction	Wind Speed (mph)
2/1/2011	6:00	NNW	4
	7:00	N	1
	8:00	SSE	10
	9:00	SSE	12
	10:00	SSE	14
	11:00	SSE	15
	12:00	SSE	20
	13:00	SE	19
	14:00	SSE	14
	15:00	SE	13
	16:00	SE	15
	17:00	SE	10
	2/2/2011	No work performed on site	
2/3/2011	No work performed on site		
2/4/2011	No work performed on site		
2/7/2011	6:00	SSE	2
	7:00	S	0
	8:00	SSE	4
	9:00	S	6
	10:00	S	5
	11:00	SSW	0
	12:00	S	5
	13:00	W	7
	14:00	WNW	5
	15:00	W	10
	16:00	WSW	7
17:00	WNW	8	
2/8/2011	6:00	NNE	0
	7:00	WSW	2
	8:00	SW	4
	9:00	SSW	5
	10:00	SW	5
	11:00	WSW	13
	12:00	W	8
	13:00	W	25
	14:00	W	28
	15:00	W	23
	16:00	WNW	17
17:00	NW	24	

TABLE 3 (Cont'd)

February Meteorological Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Time	Wind Direction	Wind Speed (mph)
2/9/2011	6:00	SE	11
	7:00	SSE	13
	8:00	SSE	11
	9:00	SE	10
	10:00	SSE	10
	11:00	SE	14
	12:00	SE	14
	13:00	ENE	11
	14:00	E	13
	15:00	ENE	9
	16:00	ENE	11
	17:00	SE	11
2/10/2011	6:00	SSE	3
	7:00	SSW	7
	8:00	SSE	6
	9:00	S	10
	10:00	SSE	7
	11:00	SSW	8
	12:00	WSW	1
	13:00	SW	7
	14:00	WSW	0
	15:00	NW	4
	16:00	WNW	4
	17:00	WNW	3
2/11/2011	6:00	NE	6
	7:00	NE	3
	8:00	NNE	1
	9:00	NE	6
	10:00	NNE	6
	11:00	N	6
	12:00	NNE	5
	13:00	WSW	0
	14:00	SW	0
	15:00	NNE	3
	16:00	W	4
	17:00	W	1
2/14/2011	6:00	N	0
	7:00	NNE	4
	8:00	NNE	0
	9:00	W	1
	10:00	NNE	4
	11:00	NNE	1
	12:00	SE	3
	13:00	WSW	1
	14:00	NW	0
	15:00	W	8
	16:00	WSW	3
	17:00	W	3

TABLE 3 (Cont'd)

February Meteorological Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Time	Wind Direction	Wind Speed (mph)
2/15/2011	6:00	NNE	6
	7:00	NNE	3
	8:00	N	6
	9:00	N	8
	10:00	N	6
	11:00	NNE	6
	12:00	NNE	6
	13:00	NE	6
	14:00	NNW	2
	15:00	WSW	6
	16:00	W	10
	17:00	W	2
2/16/2011	6:00	NNE	3
	7:00	NE	6
	8:00	NE	5
	9:00	N	3
	10:00	NNE	1
	11:00	NNW	3
	12:00	WNW	10
	13:00	WNW	14
	14:00	WNW	13
	15:00	WNW	6
16:00	WSW	14	
17:00	W	14	
2/17/2011	No work performed on site		
2/18/2011	No work performed on site		
2/21/2011	No work performed on site		
2/22/2011	No work performed on site		
2/23/2011	6:00	NNE	1
	7:00	NNE	4
	8:00	NE	2
	9:00	NE	6
	10:00	NNW	8
	11:00	NNW	5
	12:00	NNE	9
	13:00	WSW	12
	14:00	WNW	17
	15:00	WSW	12
	16:00	W	5
	17:00	W	5

TABLE 3 (Cont'd)

February Meteorological Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Time	Wind Direction	Wind Speed (mph)
2/24/2011	6:00	NNW	11
	7:00	NNW	10
	8:00	NNW	15
	9:00	NNW	11
	10:00	WNW	11
	11:00	NW	8
	12:00	W	22
	13:00	WNW	21
	14:00	WNW	14
	15:00	WNW	19
	16:00	WNW	16
2/25/2011	17:00	WNW	18
	6:00	NNE	1
	7:00	NNE	4
	8:00	N	0
	9:00	NNE	6
	10:00	WNW	10
	11:00	WNW	7
	12:00	WNW	12
	13:00	WNW	8
	14:00	W	10
	15:00	WNW	15
2/28/2011	16:00	W	11
	17:00	W	10
	6:00	NE	1
	7:00	NE	1
	8:00	NNE	4
	9:00	N	7
	10:00	NW	1
	11:00	SE	6
	12:00	SW	4
	13:00	S	5
	14:00	SW	8
15:00	WSW	1	
16:00	SE	9	
17:00	SW	6	