

April 11, 2011

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

Project No. 0118148

15810 Park Ten Place
Suite 300
Houston, Texas 77084-5140
(281) 600-1000
(281) 600-1001 (fax)

Subject: March 2011 Dust Monitoring Summary

Dear Mr. Puga:

Environmental Resources Management Southwest, Inc. (ERM) performed dust monitoring activities at the former ASARCO Smelter site in El Paso, Texas during March 2011. Total dust data was collected from monitoring locations around the perimeter of the site (Figure 1) when field work with the potential to generate dust was performed on site. With the exception of the following location, data was collected from seven monitoring locations:



- Calavera Location was not monitored after March 1, 2011 when the dust monitor stationed at that location was vandalized such that the equipment was no longer operational. A new unit will be placed at that monitoring location after additional security measures are identified and implemented to reduce the likelihood of repeated vandalism.

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

- March 7th - All fence line monitoring locations reported elevated total dust data. The elevated data was attributed to dust storms in the area.
- March 11th - The East, North East and West monitoring locations reported elevated total dust data. Elevated dust was reported upwind/crosswind of the site; therefore the elevated data is attributed to high winds and dusty conditions not specifically associated with demolition activities.
- March 15th - The East and South monitoring locations reported elevated total dust data. No site work was performed upwind of the East and South dust monitor locations indicating the elevated data were due to off-site conditions.
- March 17th - The West monitoring location reported elevated total dust data. The elevated data was observed upwind of the site indicating the elevated data was due to off-site conditions.
- March 21st - The West monitoring location reported elevated total dust data. The elevated data was observed upwind of site activities indicating the elevated data was due to off-site conditions.
- March 24th - The West monitoring location reported elevated total dust data. Heavy equipment not associated with the project was working on the river embankment West of the site near the West monitor location. Dust generated from the work on the river embankment was observed blowing across Paisano Dr. and onto the site.

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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.

A handwritten signature in black ink, appearing to read "Amy J. McDonald". The signature is fluid and cursive, with the first name "Amy" written in a larger, more prominent script than the last name "McDonald".

Amy McDonald
ERM Asarco Project Team Member

AM/mnt
Attachments

cc: MALCOLM Pirnie Asarco Project Team

Figure
Attachment 1

April 11, 2011
Project No. 0118148

Environmental Resources Management Southwest, Inc.
15810 Park Ten Place, Suite 300
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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 March 2011.

Tables

Attachment 2

April 11, 2011

Project No. 0118148

Environmental Resources Management Southwest, Inc.

15810 Park Ten Place, Suite 300

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TABLE 1

March 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.

Date	Location	Wind Direction	Value ($\mu\text{g}/\text{m}^3$)	Comments	Action
3/7/2011	All monitored locations	Winds primarily from the west at 10 to 33 mph.	90 - 158	High wind and dust advisory in effect throughout the day.	No field modifications necessary
3/11/2011	East	Winds generally less than 5 mph in the early morning. Winds generally from the west and northwest at 10 to 20 mph in the afternoon.	44	Windy and dusty conditions throughout the day. Sustained winds out of the west and northwest in the afternoon. The elevated dust data was reported upwind/crosswind of site activities indicating the elevated data was due to off-site conditions.	No field modifications necessary
3/11/2011	North East	Winds generally less than 5 mph in the early morning. Winds generally from the west and northwest at 10 to 20 mph in the afternoon.	46	Windy and dusty conditions throughout the day. Sustained winds out of the west and northwest in the afternoon. The elevated dust data was reported upwind/crosswind of site activities indicating the elevated data was due to off-site conditions.	No field modifications necessary
3/11/2011	West	Winds generally less than 5 mph in the early morning. Winds generally from the west and northwest at 10 to 20 mph in the afternoon.	53	Windy and dusty conditions throughout the day. Sustained winds out of the west and northwest in the afternoon. The elevated dust data was reported upwind/crosswind of site activities indicating the elevated data was due to off-site conditions.	No field modifications necessary
3/15/2011	East	Winds generally from the north and northeast in the morning, and from the west and southwest in the afternoon at 5 to 13 mph.	60	No site work was performed upwind of the east and south dust monitor locations indicating the elevated data was due to off-site conditions.	No field modifications necessary
3/15/2011	South	Winds generally from the north and northeast in the morning, and from the west and southwest in the afternoon at 5 to 13 mph.	46	No site work was performed upwind of the east and south dust monitor locations indicating the elevated data was due to off-site conditions.	No field modifications necessary
3/17/2011	West	Winds generally less than 5 mph in the morning with higher winds from the west in the afternoon at 10 to 20 mph.	65	Higher sustained winds were out of the west in the afternoon. Elevated total dust readings were observed upwind of the site activities indicating that the elevated readings were due to off-site conditions.	No field modifications necessary
3/21/2011	West	Winds generally from the northwest, west, and southwest at 10 to 25 mph.	51	Elevated dust readings were observed upwind of site activities indicating that the elevated data was due to off-site conditions.	No field modifications necessary
3/24/2011	West	Winds generally from the west and northwest at 10 to 26 mph.	47	Heavy equipment not associated with the project was working on the river embankment west of the site near the west monitor location. Dust generated from the work on the river embankment was observed blowing across Paisano Dr. and onto the site. Site activities were downwind of the elevated dust data.	No field modifications necessary

TABLE 2

March Fence Line Dust Monitoring Data Weekly Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending March 5th							
Date			Tuesday, March 01, 2011	Wednesday, March 02, 2011	Thursday, March 03, 2011	Friday, March 04, 2011	Saturday, March 05, 2011
Location			Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)
South			24	8	8	12	
East			19	Malfunction	17	25	
North			Malfunction	18	10	16	
North East			27	13	10	15	
North West			25	12	1	18	
Calavera							
West			25	16	10	14	
Week ending March 12th							
Date	Sunday, March 06, 2011	Monday, March 07, 2011	Tuesday, March 08, 2011	Wednesday, March 09, 2011	Thursday, March 10, 2011	Friday, March 11, 2011	Saturday, March 12, 2011
Location		Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)
South		90	11	13	16	40	
East		121	19	14	18	44	
North		101	14	16	Malfunction	38	
North East		127	15	11	25	46	
North West		113	21	12	24	Malfunction	
Calavera							
West		158	41	9	30	53	
Week ending March 19th							
Date	Sunday, March 13, 2011	Monday, March 14, 2011	Tuesday, March 15, 2011	Wednesday, March 16, 2011	Thursday, March 17, 2011	Friday, March 18, 2011	Saturday, March 19, 2011
Location		Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)
South		39	46	10	Malfunction	21	
East		28	60	14	10	24	
North		20	33	14	11	18	
North East		23	31	4	17	22	
North West		33	36	15	Malfunction	25	
Calavera							
West		24	36	26	65	20	
Week ending March 26th							
Date	Sunday, March 20, 2011	Monday, March 21, 2011	Tuesday, March 22, 2011	Wednesday, March 23, 2011	Thursday, March 24, 2011	Friday, March 25, 2011	Saturday, March 26, 2011
Location		Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)
South		43	14	12	40	26	
East		26	13	13	25	19	
North		19	13	13	19	18	
North East		30	15	15	21	16	
North West		25	20	20	22	21	
Calavera							
West		51	22	22	47	26	
Week ending April 2nd							
Date	Sunday, March 27, 2011	Monday, March 28, 2011	Tuesday, March 29, 2011	Wednesday, March 30, 2011	Thursday, March 31, 2011		
Location		Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)		
South		33	6	29	10		
East		22	14	24	12		
North		21	9	25	8		
North East		16	8	23	7		
North West		15	11	20	4		
Calavera							
West		36	11	27	4		

NOTES:

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

TABLE 3

March Meteorological Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

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

TABLE 3 (Cont'd)

March Meteorological Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Time	Wind Direction	Wind Speed (mph)
3/4/2011	6:00	NNE	2
	7:00	NNE	0
	8:00	NNE	5
	9:00	NNE	6
	10:00	NNE	10
	11:00	NNW	7
	12:00	WNW	10
	13:00	WNW	6
	14:00	NNW	9
	15:00	NNE	8
3/7/2011	16:00	WNW	8
	17:00	N	6
	6:00	NNE	4
	7:00	NNE	4
	8:00	NE	4
	9:00	WNW	8
	10:00	W	14
	11:00	W	16
	12:00	W	19
	13:00	W	36
3/8/2011	14:00	W	30
	15:00	W	32
	16:00	W	37
	17:00	WNW	24
	6:00	N	10
	7:00	N	6
	8:00	N	8
	9:00	NNW	3
	10:00	NW	0
	11:00	NW	2
12:00	N	1	
13:00	NNE	4	
14:00	NW	2	
15:00	WNW	4	
16:00	WNW	5	
17:00	NW	5	

TABLE 3 (Cont'd)

March Meteorological Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

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

TABLE 3 (Cont'd)

March Meteorological Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

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

TABLE 3 (Cont'd)

March Meteorological Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Time	Wind Direction	Wind Speed (mph)
3/17/2011	6:00	NNW	6
	7:00	NNE	0
	8:00	ENE	5
	9:00	NE	5
	10:00	SSE	5
	11:00	NNW	4
	12:00	NW	9
	13:00	NW	6
	14:00	W	20
	15:00	W	10
3/18/2011	16:00	W	13
	17:00	W	10
	6:00	NE	0
	7:00	NE	1
	8:00	NE	0
	9:00	NNE	4
	10:00	NNE	4
	11:00	NNE	6
	12:00	W	8
	13:00	WNW	10
3/21/2011	14:00	WNW	7
	15:00	WNW	5
	16:00	WSW	7
	17:00	S	12
	6:00	NNE	6
	7:00	NE	6
	8:00	NE	5
	9:00	NE	0
	10:00	SSW	1
	11:00	W	13
12:00	SW	3	
13:00	WNW	14	
14:00	W	12	
15:00	W	12	
16:00	W	15	
17:00	SW	22	

TABLE 3 (Cont'd)

March Meteorological Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Time	Wind Direction	Wind Speed (mph)
3/22/2011	6:00	NNW	9
	7:00	N	9
	8:00	NNW	6
	9:00	NNW	13
	10:00	N	12
	11:00	N	11
	12:00	NW	10
	13:00	N	13
	14:00	W	12
	15:00	WNW	11
	16:00	WNW	11
	17:00	NNW	13
3/23/2011	6:00	---	0
	7:00	NE	5
	8:00	NE	2
	9:00	NNE	5
	10:00	NNE	5
	11:00	N	2
	12:00	N	2
	13:00	NW	4
	14:00	N	2
	15:00	NNE	0
	16:00	W	2
	17:00	ESE	4
3/24/2011	18:00	SW	5
	19:00	NE	4
	20:00	NE	7
	21:00	N	5
	22:00	WNW	17
	23:00	WNW	14
	0:00	NW	14
	1:00	N	11
	2:00	W	20
	3:00	WNW	16
	4:00	W	22
	5:00	WNW	24

TABLE 3 (Cont'd)

March Meteorological Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Time	Wind Direction	Wind Speed (mph)
3/28/2011	6:00	N	5
	7:00	NNE	4
	8:00	NE	5
	9:00	NNE	4
	10:00	NNE	7
	11:00	NNE	7
	12:00	WNW	13
	13:00	NW	9
	14:00	WNW	18
	15:00	W	22
	16:00	NNW	9
3/29/2011	17:00	WNW	15
	18:00	NNE	3
	19:00	N	4
	20:00	NNE	5
	21:00	NNE	8
	22:00	NNW	0
	23:00	N	6
	0:00	NW	8
	1:00	N	3
	2:00	SW	7
	3:00	N	6
3/30/2011	4:00	ENE	7
	5:00	NNE	5
	6:00	SSE	9
	7:00	S	7
	8:00	S	5
	9:00	ESE	7
	10:00	SE	6
	11:00	S	2
	12:00	NE	5
	13:00	NNW	8
	14:00	WNW	14
3/31/2011	15:00	WNW	19
	16:00	NW	8
	17:00	NNW	11
	6:00	NE	2
	7:00	WNW	0
	8:00	-	0
	9:00	NNW	6
	10:00	N	8
	11:00	NNW	11
	12:00	N	5
	13:00	NW	6
14:00	NW	6	
15:00	NNW	12	
16:00	N	10	
17:00	N	9	