

September 21, 2011

Mr. Roberto Puga, Trustee  
Texas Custodial Trust  
One Pointe Drive, Suite 320  
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Project No. 0118148

Environmental  
Resources  
Management

15810 Park Ten Place  
Suite 300  
Houston, Texas 77084-5140  
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Subject: August 2011 Dust Monitoring Summary

Dear Mr. Puga:

Environmental Resources Management (ERM) performed dust monitoring activities at the former ASARCO Smelter site in El Paso, Texas during August 2011. Dust data was collected from monitoring locations near the site fence line (Figure 1) when field work with the potential to generate dust was performed on site. An on site meteorological station is used to assess wind speed and direction. The anemometer broke on August 17 and is currently undergoing repairs. As a result, meteorological data from a nearby station was used to evaluate wind speed after August 16. Meteorological data is provided in Attachment 1.



Daily average dust concentrations were at or below the sentinel value of  $43 \mu\text{g}/\text{m}^3$  for all dust monitoring locations during the month of August with the exception of the North monitor location on August 29, 30 and 31. Dusty and hazy conditions existed in the El Paso and Juarez area throughout those days and data from other on site monitors ranged from 26 to  $39 \mu\text{g}/\text{m}^3$ , indicating dusty conditions in the surrounding area. On those days, demolition activities were taking place within 40 feet of the North monitor location, and some of the elevated data may be attributed to exhaust from the heavy equipment and mist used to suppress dust during active demolition. Significant levels of visible dust were not observed being generated during these demolition activities. A background dust evaluation was conducted on the elevated data using the upwind South monitor location. Subtracting background dust from the average dust reading for the North location resulted in the actual dust generated on site to be:

- $43 \mu\text{g}/\text{m}^3$  on August 29;
- $12 \mu\text{g}/\text{m}^3$  on August 30; and
- $16 \mu\text{g}/\text{m}^3$  on August 31.

As a result, site-generated dust is at or below the sentinel value.

A summary of the elevated dust data is provided in Table 1, and a summary of daily average dust concentration data is provided in Table 2.

Sincerely,

Environmental Resources Management

Amy McDonald  
ERM Asarco Project Team Member

AM/hmh  
Attachments

cc: MALCOLM Pirnie Asarco Project Team

## **Figure**

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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 August 2011.

## **Tables**

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TABLE 1

## August Fence Line Elevated Dust Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

*Except as noted below, daily average dust readings were below the site-specific internal sentinel value of 43 ug/m<sup>3</sup>.*

Date	Location	Wind Direction	Value (ug/m <sup>3</sup> )	Comments	Action
8/29/2011	North	Low winds throughout the day with average winds speeds between 4.8 and 7.5 mph predominately out of the south and south east.	74	Subtracting background dust from the average dust reading for the North monitor results in the actual dust generated on site to be 43 ug/m <sup>3</sup> for the North monitor. Accounting for background dust concentration places site generated dust at the sentinel value.	No field modifications necessary
8/30/2011	North	Low winds throughout the day with average winds speeds between 3.1 and 5.7 mph predominately out of the south and south west.	51	Subtracting background dust from the average dust reading for the North monitor results in the actual dust generated on site to be 12 ug/m <sup>3</sup> for the North monitor. Accounting for background dust concentration places site generated dust below the sentinel value.	No field modifications necessary
8/31/2011	North	Low to moderate winds throughout the day with average winds speeds between 6.9 and 10.7 mph predominately out of the east and south east.	48	Subtracting background dust from the average dust reading for the North monitor results in the actual dust generated on site to be 16 ug/m <sup>3</sup> for the North monitor. Accounting for background dust concentration places site generated dust below the sentinel value.	No field modifications necessary

TABLE 2

## August Fence Line Dust Monitoring Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

Week ending August 6th					
Date	Monday, August 01, 2011	Tuesday, August 02, 2011	Wednesday, August 03, 2011	Thursday, August 04, 2011	Friday, August 05, 2011
Location	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )
South	16	13	16	20	12
West	16	19	15	22	13
North West	16	13	21	19	9
North	12	14	19	19	12
North East	19	14	17	22	10
East	14	14	14	19	10
Calavera	14	12	12	17	9

Week ending August 13th					
Date	Monday, August 08, 2011	Tuesday, August 09, 2011	Wednesday, August 10, 2011	Thursday, August 11, 2011	Friday, August 12, 2011
Location	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )
South	14	13	14	9	10
West	15	<i>Malfunction</i>	<i>Malfunction</i>	10	10
North West	13	14	11	11	11
North	13	13	11	12	10
North East	17	14	11	12	12
East	17	14	15	12	12
Calavera	13	11	10	10	9

Week ending August 20th					
Date	Monday, August 15, 2011	Tuesday, August 16, 2011	Wednesday, August 17, 2011	Thursday, August 18, 2011	Friday, August 19, 2011
Location	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )
South	24	13	20	22	14
West	23	14	18	24	16
North West	28	14	34	19	15
North	25	14	38	18	11
North East	26	15	20	20	10
East	23	13	18	18	11
Calavera	22	12	15	17	9

Week ending August 27th					
Date	Monday, August 22, 2011	Tuesday, August 23, 2011	Wednesday, August 24, 2011	Thursday, August 25, 2011	Friday, August 26, 2011
Location	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )
South	24	19	13	12	24
West	22	19	13	12	23
North West	22	22	19	12	24
North	21	20	13	13	23
North East	24	21	14	14	27
East	23	20	13	13	25
Calavera	20	16	11	10	23

Week ending September 3rd					
Date	Monday, August 29, 2011	Tuesday, August 30, 2011	Wednesday, August 31, 2011	Thursday, September 01, 2011	Friday, September 02, 2011
Location	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )	Average Reading (ug/m <sup>3</sup> )		
South	31	39	32		
West	29	37	30		
North West	34	36	35		
North	74	51	48		
North East	32	39	33		
East	28	35	30		
Calavera	26	31	24		

## NOTES:

1. Readings indicate PM<sub>10</sub> dust based on direct read monitoring from TSI DustTrack II 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.

**Meteorological Summary Graphs**  
*Attachment 1*

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