

December 21, 2011

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

Project No. 0118148

Subject: November 2011 Dust Monitoring Summary

Dear Mr. Puga:



Environmental Resources Management (ERM) and Malcolm Pirnie, Inc. (Malcolm Pirnie) performed dust monitoring activities at the former ASARCO Smelter site in El Paso, Texas during November 2011. Dust data was collected from monitoring locations near the site fence line and La Calavera to monitor dust potentially generated by demolition activities. In addition, on November 3, 2011 landfill construction excavation activities began in Parker Brothers Arroyo. These construction activities are outside of the ongoing perimeter dust monitoring network. Therefore, three additional dust monitors were deployed around the arroyo. Dust monitor locations are shown on Figure 1. An on site meteorological station was used to assess wind speed and direction. 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 November with the exception of:

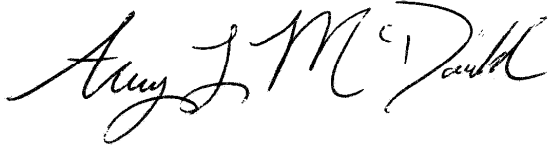
- November 2<sup>nd</sup> – The daily average dust concentrations for all active monitor stations, with the exception of the Calavera station, were greater than the sentinel value. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitors upwind of demolition activities and monitors with no demolition activities in their proximity. The elevated dust concentrations for the day are attributed to off-site conditions.
- November 21<sup>st</sup> – The daily average dust concentration for the East monitor station was greater than the sentinel value. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. Dusty and windy conditions existed in the El Paso area causing dust from areas with no active demolition to migrate towards the monitor station. Winds speeds were recorded at up to 41 mph and the times that elevated levels of dust were recorded directly correlate with times that high winds occurred. The elevated dust concentrations are not attributed to active demolition on site.

- November 29<sup>th</sup> – The daily average dust concentration for the South monitor station was greater than the sentinel value. Hazy conditions existed south of the site throughout the morning and winds in the afternoon were generally out of the south/southeast. There were no demolition activities that occurred at the southern end of the site on this day. The elevated data is attributed to off-site conditions.
- November 30<sup>th</sup> – The daily average dust concentrations for all monitor stations, with the exception of the South and Calavera stations, were greater than the sentinel value. Hazy conditions existed in the surrounding area throughout the day, and the smell of smoke was observed onsite. Monitor stations upwind of site activities and monitor stations with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions.

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 Former ASARCO Smelter Project Team Member

AM/mnt

Attachments

cc: MALCOLM Pirnie Former ASARCO Smelter Project Team

## **Figure**

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**Environmental Resources Management**  
15810 Park Ten Place, Suite 300  
Houston, Texas 77084-5140  
(281) 600-1000

Figure 1  
Texas Custodial Trust  
Former Asarco Smelter Site  
El Paso, Texas  
Dust Monitoring Locations



For monitoring locations during November 2011.

## **Tables**

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TABLE 1

## November Elevated Dust Monitor 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 (µg/m <sup>3</sup> )	Comments	Action
11/2/2011	East, North, North East, North West, West, and South	Moderate to high winds throughout the day with wind speeds between 5 and 23 mph. Winds were predominately out of the north.	48-56	The National Weather Service issued a Hazardous Weather Outlook for the afternoon. Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitors upwind of demolition activities and monitors with no demolition activities in their proximity. The elevated dust concentrations for the day are attributed to off-site conditions.	No field modifications necessary
11/21/2011	East	Low to moderate winds in the early morning with wind speeds between 0 and 11 mph. Wind gusts of up to 41 mph in the afternoon.	107	The National Weather Service issued a Hazardous Weather Outlook for the afternoon. Dusty and windy conditions existed in the El Paso area causing dust from areas with no active demolition to migrate towards the monitor station. Winds speeds were recorded at up to 41 mph and the times that elevated levels of dust were recorded directly correlate with times that high winds occurred. The elevated dust concentrations are not attributed to active demolition on site.	No field modifications necessary
11/29/2011	South	Low to no winds in the morning with variable wind directions and wind speeds between 0 and 9 mph. Low to moderate winds in the afternoon with variable wind directions and wind speeds between 2 and 14 mph.	44	Hazy conditions existed south of the site throughout the morning and winds in the afternoon were generally out of the south/southeast. There were no demolition activities that occurred at the southern end of the site on this day. The elevated data is attributed to off-site conditions.	No field modifications necessary
11/30/2011	East, North, North East, North West, West, and Arroyo West	Moderate to no winds throughout the day with variable wind directions and wind speeds between 0 and 13 mph.	47-51	Hazy conditions existed in the surrounding area throughout the day, and the smell of smoke was observed onsite. Monitor stations upwind of site activities and monitor stations with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions.	No field modifications necessary

TABLE 2

## November Daily Average Monitoring Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

Week of October 31st						
Date	Monday, October 31, 2011	Tuesday, November 01, 2011	Wednesday, November 02, 2011	Thursday, November 03, 2011	Friday, November 04, 2011	Saturday, November 05, 2011
Location	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )
South		37	49	13	32	
West		37	51	11	30	
North West		36	54	17	39	
North		37	48	14	43	
North East		43	56	12	36	
East		33	52	13	38	
Calavera		22	32	7	23	
Arroyo West				9	36	
Arroyo South						
Arroyo North				12	40	

Week of November 7th						
Date	Monday, November 07, 2011	Tuesday, November 08, 2011	Wednesday, November 09, 2011	Thursday, November 10, 2011	Friday, November 11, 2011	Saturday, November 12, 2011
Location	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )
South	35	12	13	25	23	
West	40	11	12	25	25	
North West	36	9	21	24	29	
North	31	10	11	22	26	
North East	39	12	23	23	25	
East	37	11	11	25	23	
Calavera	21	6	5	13	16	
Arroyo West	41	11	6	9	25	8
Arroyo South	26	7	8	14	24	9
Arroyo North	37	Malfunction	5	Malfunction	23	10

Week of November 14th						
Date	Monday, November 14, 2011	Tuesday, November 15, 2011	Wednesday, November 16, 2011	Thursday, November 17, 2011	Friday, November 18, 2011	Saturday, November 19, 2011
Location	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )
South	9	7	10	13	20	
West	8	6	10	11	21	
North West	7	5	11	21	18	
North	8	7	10	13	17	
North East	8	6	11	12	20	
East	8	7	11	12	26	
Calavera	4	3	6	7	10	
Arroyo West	16	4	9	11	13	6
Arroyo South	4	6	7	20	15	8
Arroyo North	4	4	7	9	12	11

Week of November 21st						
Date	Monday, November 21, 2011	Tuesday, November 22, 2011	Wednesday, November 23, 2011	Thursday, November 24, 2011	Friday, November 25, 2011	Saturday, November 26, 2011
Location	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )
South	28	22				
West	35	12				
North West	18	12				
North	18	17				
North East	23	12				
East	107	12				
Calavera	10	7				
Arroyo West	35					
Arroyo South	17					
Arroyo North	15					

Week of November 28th						
Date	Monday, November 28, 2011	Tuesday, November 29, 2011	Wednesday, November 30, 2011	Thursday, December 01, 2011	Friday, December 02, 2011	Saturday, December 03, 2011
Location	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )	Average Heading (ug/m <sup>3</sup> )
South	9	44	43			
West	10	40	51			
North West	9	25	47			
North	9	26	48			
North East	11	27	49			
East	10	32	48			
Calavera	6	16	29			
Arroyo West	25	26	46			
Arroyo South	11	23	43			
Arroyo North	6	18	41			

## NOTES:

1. Readings indicate PM<sub>10</sub> dust based on direct read monitoring from TSI DustTrack II equipment.
2. Gray cell indicates that dust monitoring was not conducted that day because there were no demolition or remediation activities taking place that day.
3. Blue cell indicates that the meter malfunctioned at that location.

**Meteorological Summary Graphs**  
*Attachment 1*

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