

February 21, 2012

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

Project No. 0118148

Subject: January 2012 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 January 2012. When activities with the potential to generate dust were conducted on site, dust data was collected from monitoring locations near the site fence line, around the arroyo, and near La Calavera. With the exception of the following, dust was monitored each day in January.

- Work was not conducted on site on Sundays.
- With the exception of January 21st, field activities were limited to the Arroyo area on Saturdays. As a result, only data from the Arroyo locations were reported on Saturdays.
- January 2nd was a holiday and work was not conducted on site.
- Field activities did not take place in the Arroyo on January 9th. As a result, only data from the perimeter locations were reported.
- On January 18th and 21st the Arroyo North monitor malfunctioned.
- On January 19th, the West monitor began malfunctioning. After trying to troubleshoot the equipment on site, it was sent to the manufacturer for repairs. A rented piece of equipment was mobilized the following week and remained on site until the original unit was repaired and returned to the site.

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. The station did not record data on January 20 and 21, 2012. On those days, a station (TCEQ El Paso UTEP CAM Station) located approximately 1.4 miles from the on-site station was used.

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 January with the exception of the following days:

- January 16th - The daily average dust concentration for the East monitor was greater than the sentinel value. Windy and hazy conditions existed in the El Paso and Juarez area. The National Weather Service issued a Hazardous Weather Outlook for the afternoon, and wind speeds up to 35 mph were recorded on site. Demolition activities were taking place near the monitor, and dust suppression activities were implemented during the demolition activities. However, visible dust from areas without active demolition was observed migrating towards the monitor when wind speeds were high. The times that elevated levels of dust were recorded directly correlate with times that high winds occurred. A background dust evaluation was conducted on the elevated data using the upwind (North West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East location resulted in the actual dust generated on site to be 31 ug/m³ which is below the site-specific sentinel value of 43 ug/m³.
- January 31st - The daily average dust concentration for the Arroyo South monitor was greater than the sentinel value. Landfill construction activities took place immediately upwind of the monitor during the afternoon hours. Dust suppression was implemented to reduce the dust generated by the activity. Additionally, the monitor was re-located to a position further downwind of the construction activities to protect the monitor from damage and allow for accurate measurement of dust concentrations leaving the area versus a measurement directly adjacent to an internal haul road. Elevated dust concentrations were not observed at monitors located off-site and downwind of the Arroyo south monitor. A background dust evaluation was conducted using the upwind (Arroyo North) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South location resulted in the actual dust generated on site to be 29 ug/m³ which is below the site-specific sentinel value of 43 ug/m³.

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

February 21, 2012
Project No. 0118148

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 January 2012.

Tables

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

TABLE 1

January 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/m³.

Date	Location	Wind Direction	Value (µg/m ³)	Comments	Action
1/16/2012	East	Low to moderate winds in the morning with wind speeds between 0 and 17 mph, and moderate to high winds in the afternoon with wind speeds between 8 and 35 mph. Winds were predominately out of the northwest throughout the day.	45	Windy and hazy conditions existed in the El Paso and Juarez area. The National Weather Service issued a Hazardous Weather Outlook for the afternoon, and wind speeds up to 35 mph were recorded on site. Demolition activities were taking place near the monitor, and dust suppression activities were implemented during the demolition activities. However, visible dust from areas without active demolition was observed migrating towards the monitor when wind speeds were high. The times that elevated levels of dust were recorded directly correlate with times that high winds occurred. A background dust evaluation was conducted on the elevated data using the upwind (North West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East location resulted in the actual dust generated on site to be 31 ug/m ³ which is below the site-specific sentinel value of 43 ug/m ³ .	No field modifications necessary
1/31/2012	Arroyo South	Low winds in the morning with wind speeds between 0 and 8 mph, and moderate winds in the afternoon with wind speeds between 5 and 22 mph. Winds were predominately out of the northwest throughout the day.	46	Landfill construction activities took place immediately upwind of the monitor during the afternoon hours. Dust suppression was implemented to reduce the dust generated by the activity. Additionally, the monitor was re-located to a position further downwind of the construction activities to protect the monitor from damage and allow for accurate measurement of dust concentrations leaving the area versus a measurement directly adjacent to an internal haul road. Elevated dust concentrations were not observed at monitors located off-site and downwind of the Arroyo south monitor. A background dust evaluation was conducted using the upwind (Arroyo North) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South location resulted in the actual dust generated on site to be 29 µg/m ³ which is below the site-specific sentinel value of 43 µg/m ³ .	No field modifications necessary

TABLE 2

January Daily Average Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending January 7th						
Date	Monday, January 02, 2012	Tuesday, January 03, 2012	Wednesday, January 04, 2012	Thursday, January 05, 2012	Friday, January 06, 2012	Saturday, January 07, 2012
Location	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)
South		22	12	15	8	
West		23	11	14	8	
North West		20	12	12	7	
North		19	10	11	8	
North East		24	13	13	13	
East		21	10	13	10	
Calavera		11	5	6	4	
Arroyo West		23	11	12	9	32
Arroyo South		23	8	13	10	27
Arroyo North		20	5	11	10	29

Week ending January 14th						
Date	Monday, January 09, 2012	Tuesday, January 10, 2012	Wednesday, January 11, 2012	Thursday, January 12, 2012	Friday, January 13, 2012	Saturday, January 14, 2012
Location	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)
South	38	21	10	15	25	
West	35	18	9	15	29	
North West	33	17	7	17	21	
North	31	17	9	12	19	
North East	32	19	10	16	22	
East	32	20	9	15	23	
Calavera	17	9	3	7	11	
Arroyo West	19	19	7	24	21	16
Arroyo South		23	10	15	21	17
Arroyo North		18	6	15	19	2

Week ending January 21st						
Date	Monday, January 16, 2012	Tuesday, January 17, 2012	Wednesday, January 18, 2012	Thursday, January 19, 2012	Friday, January 20, 2012	Saturday, January 21, 2012
Location	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)
South	25	7	8	7	13	8
West	26	10	9	Malfunction	Malfunction	Malfunction
North West	14	6	6	5	7	6
North	13	8	7	5	9	6
North East	20	8	8	7	11	9
East	45	10	8	8	26	7
Calavera	5	3	2	2	2	3
Arroyo West	12	4	5	4	23	7
Arroyo South	23	8	13	10	18	11
Arroyo North	20	5	Malfunction	4	6	Malfunction

Week ending January 28th						
Date	Monday, January 23, 2012	Tuesday, January 24, 2012	Wednesday, January 25, 2012	Thursday, January 26, 2012	Friday, January 27, 2012	Saturday, January 28, 2012
Location	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)
South	27	15	13	14	9	
West	Malfunction	Malfunction	Malfunction	Malfunction	10	
North West	18	7	11	9	10	
North	15	9	11	9	9	
North East	17	12	12	10	13	
East	22	9	12	11	10	
Calavera	7	4	5	4	5	
Arroyo West	19	8	12	11	11	9
Arroyo South	20	9	14	9	9	4
Arroyo North	21	4	8	6	6	4

Week ending February 4th						
Date	Monday, January 30, 2012	Tuesday, January 31, 2012	Wednesday, February 01, 2012	Thursday, February 02, 2012	Friday, February 03, 2012	Saturday, February 04, 2012
Location	Average Reading (ug/m ³)	Average Reading (ug/m ³)				
South	20	24				
West	20	30				
North West	17	17				
North	17	17				
North East	18	19				
East	19	23				
Calavera	9	8				
Arroyo West	18	21				
Arroyo South	23	46				
Arroyo North	16	19				

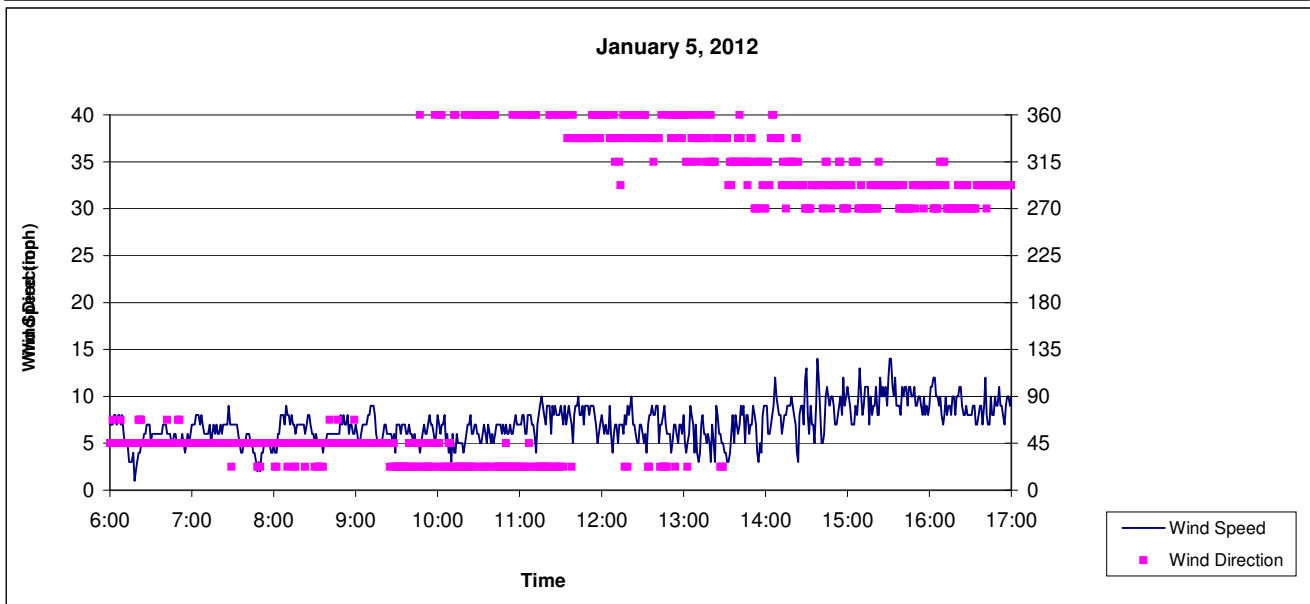
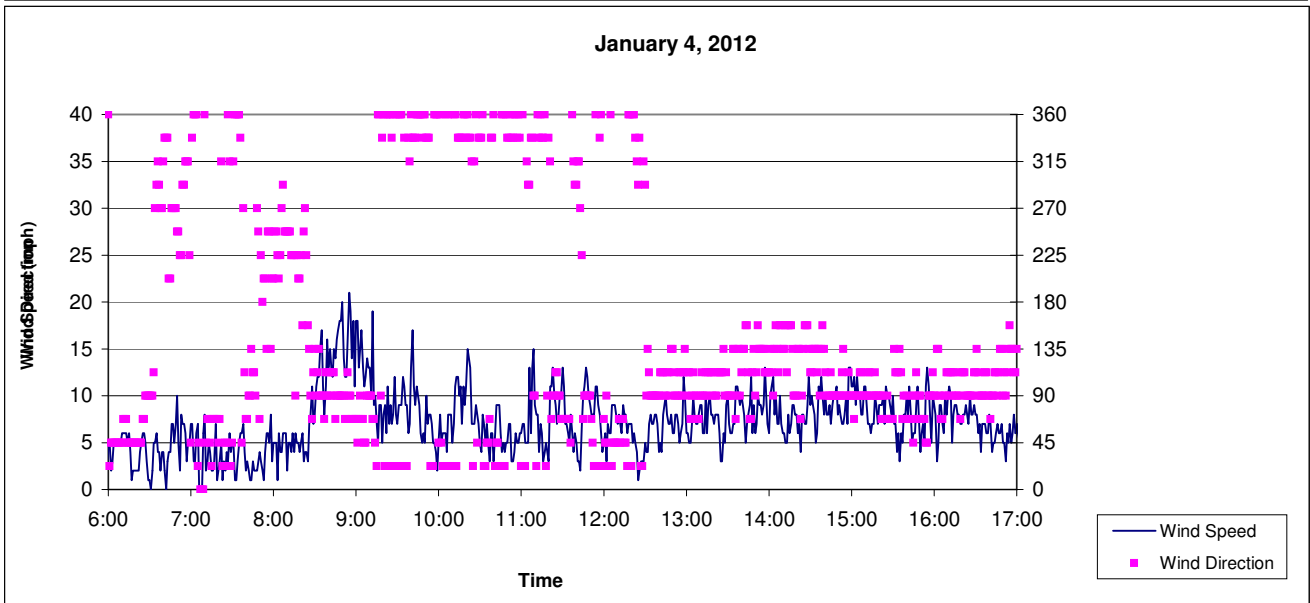
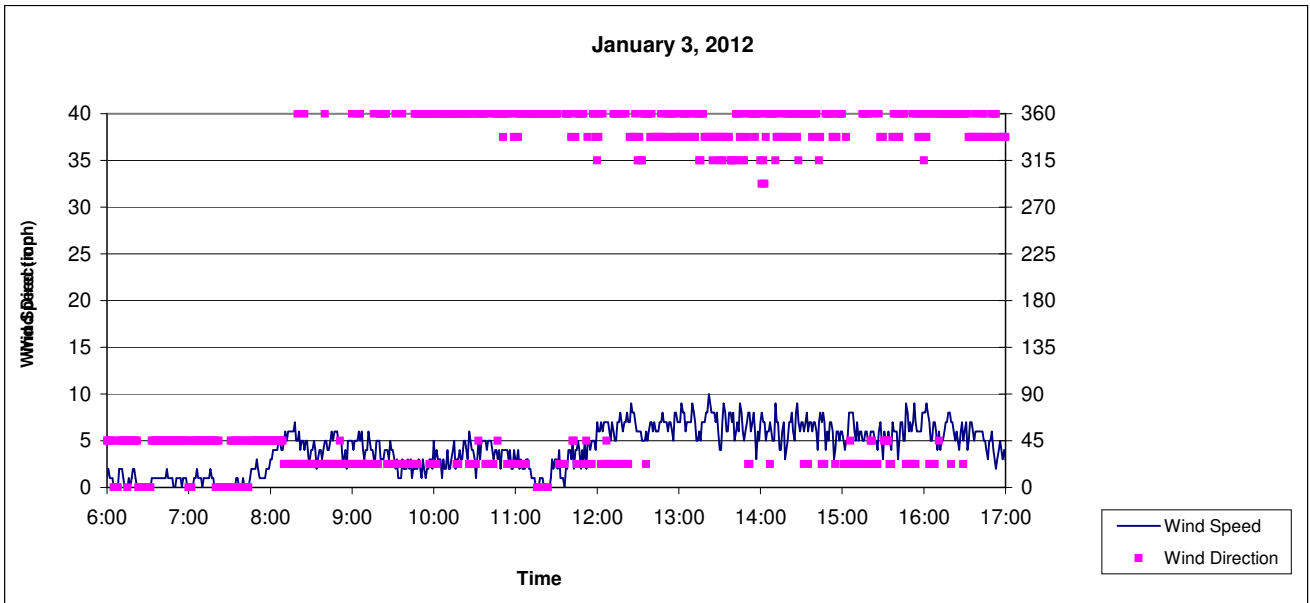
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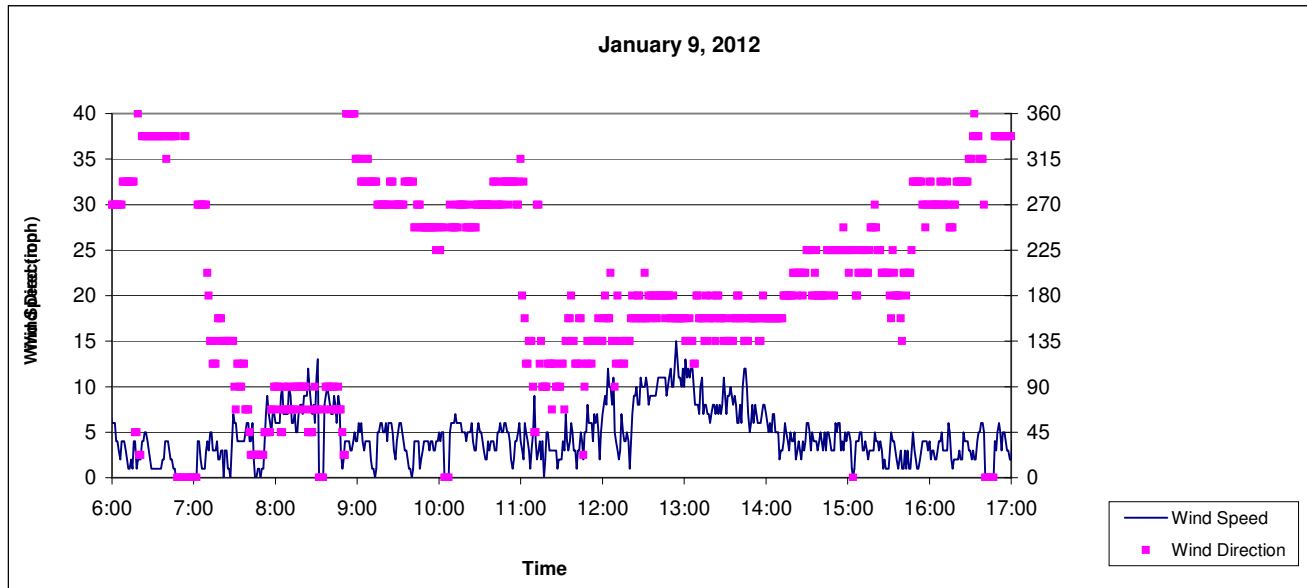
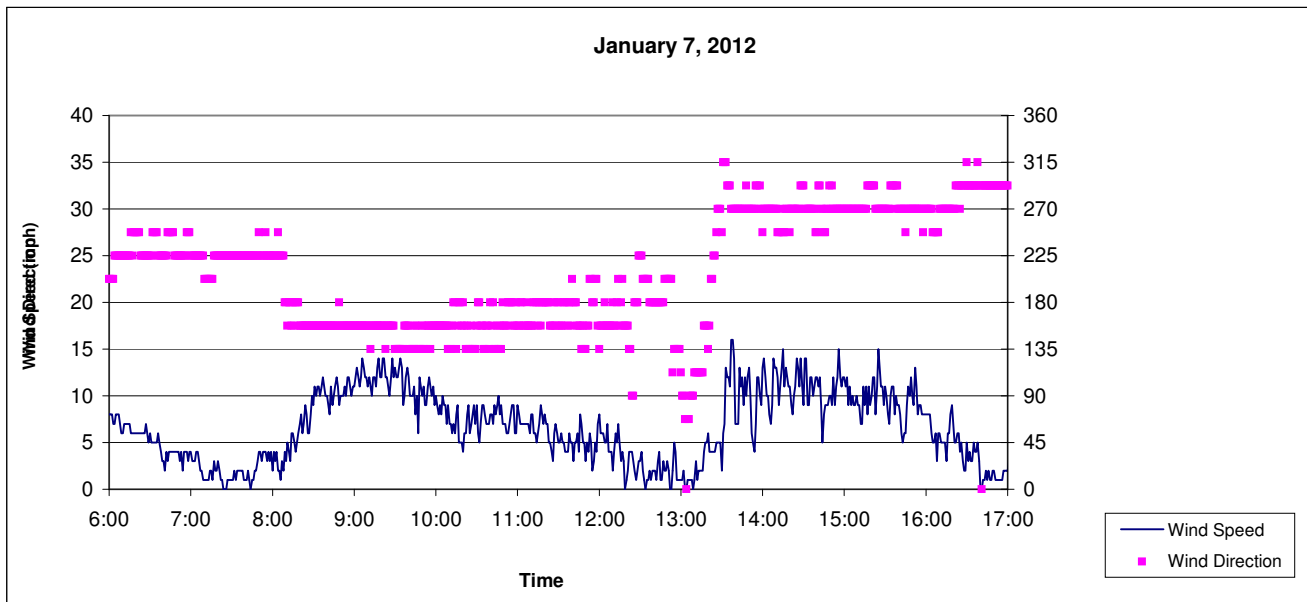
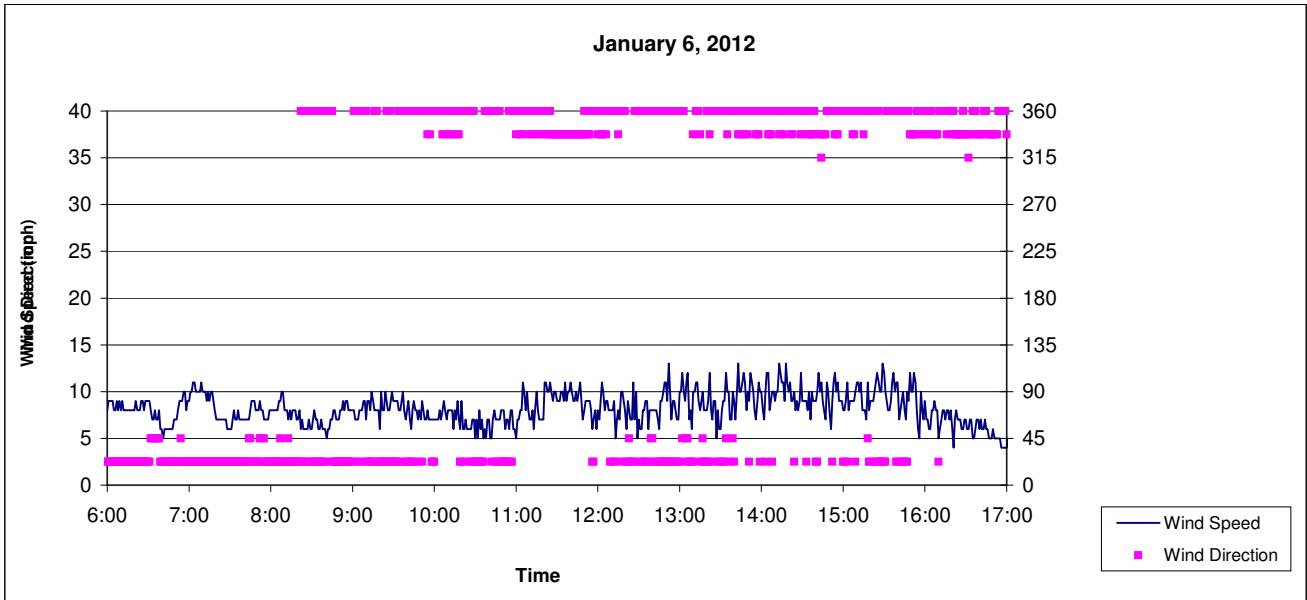
1. Readings indicate PM₁₀ dust based on direct read monitoring from TSI DustTrack II equipment.
2. Gray cell indicates that dust monitoring was not conducted that day because there were no demolition or remediation activities taking place that day.
3. Blue cell indicates that the meter malfunctioned at that location.

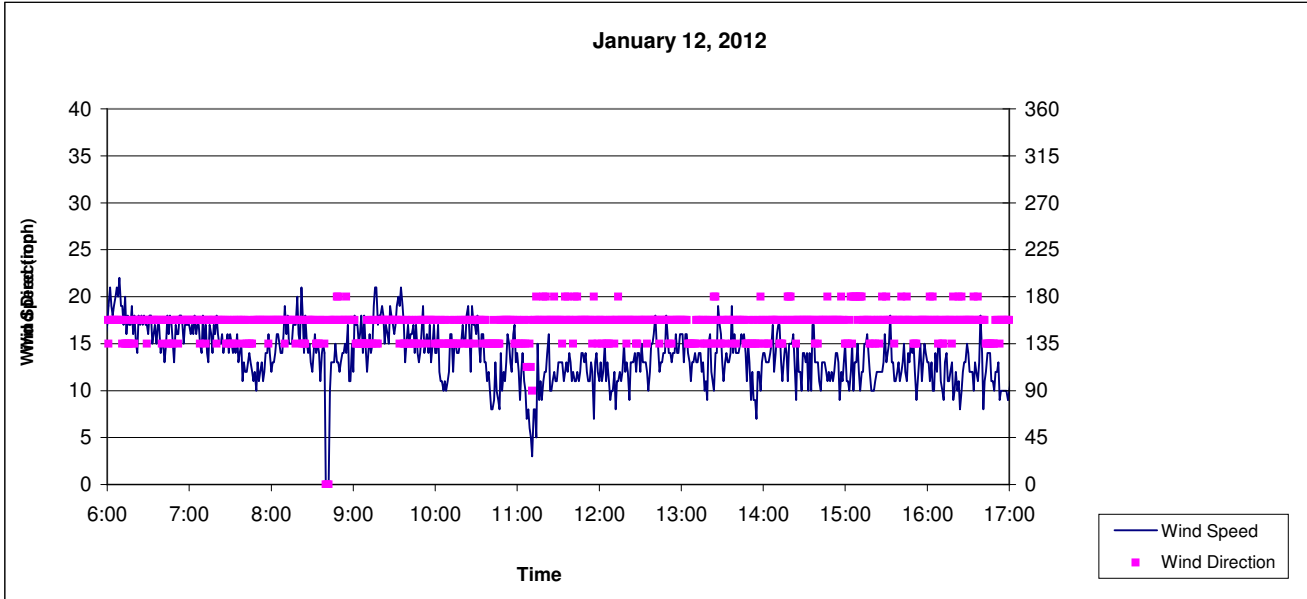
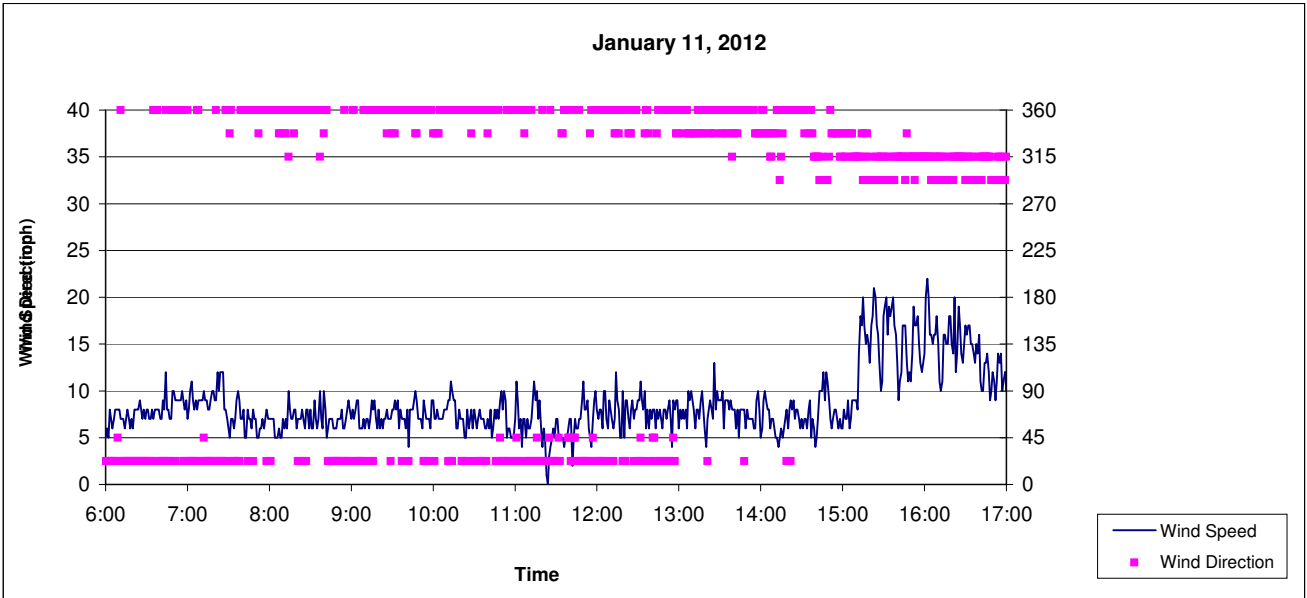
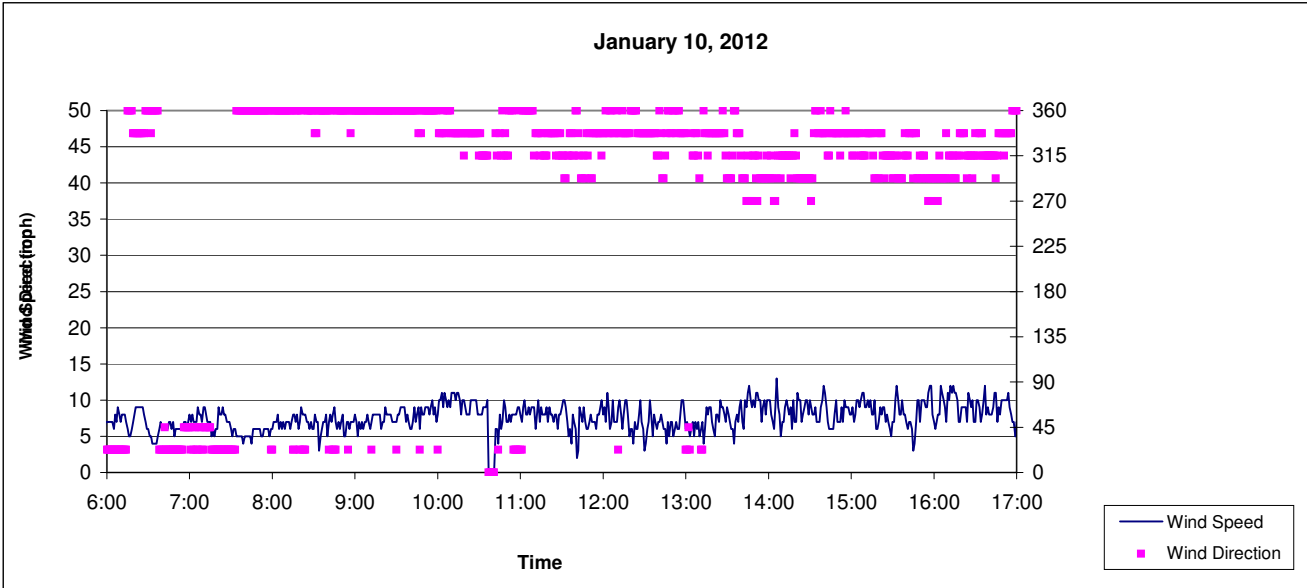
Meteorological Summary Graphs
Attachment 1

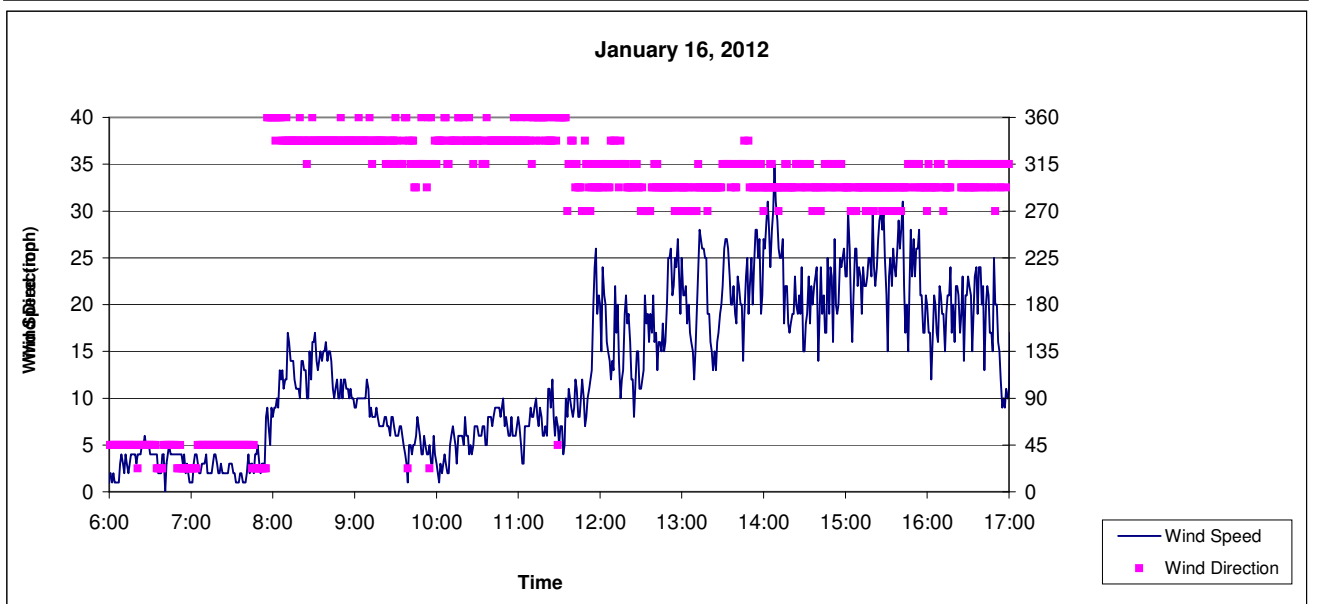
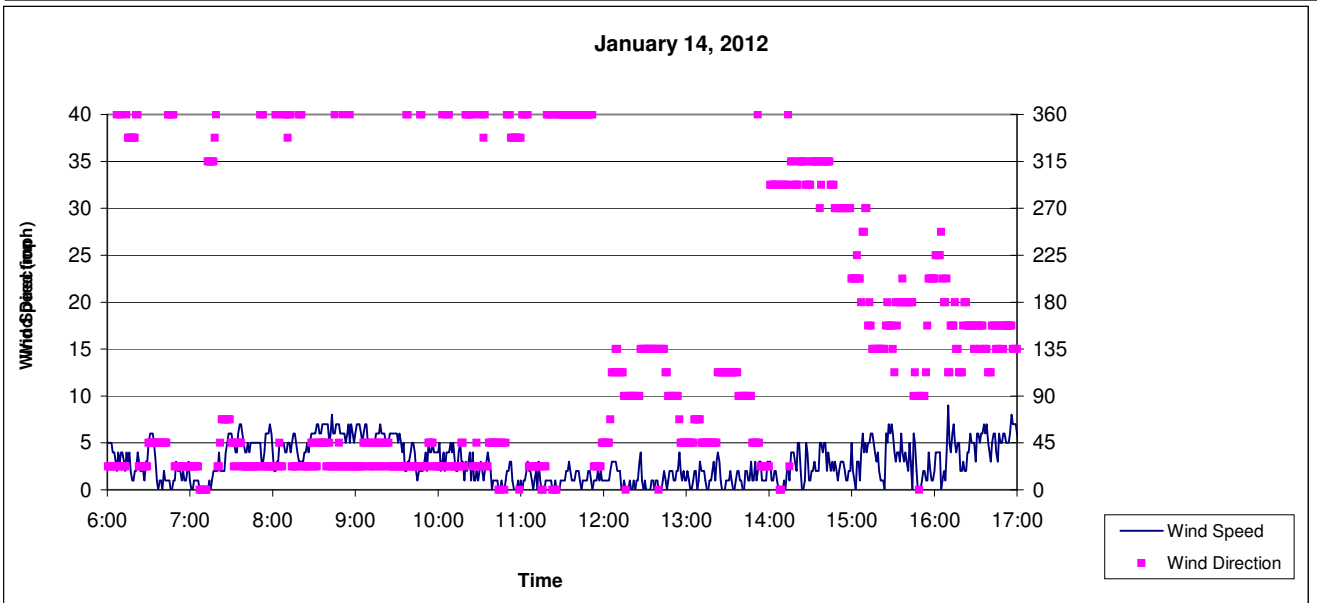
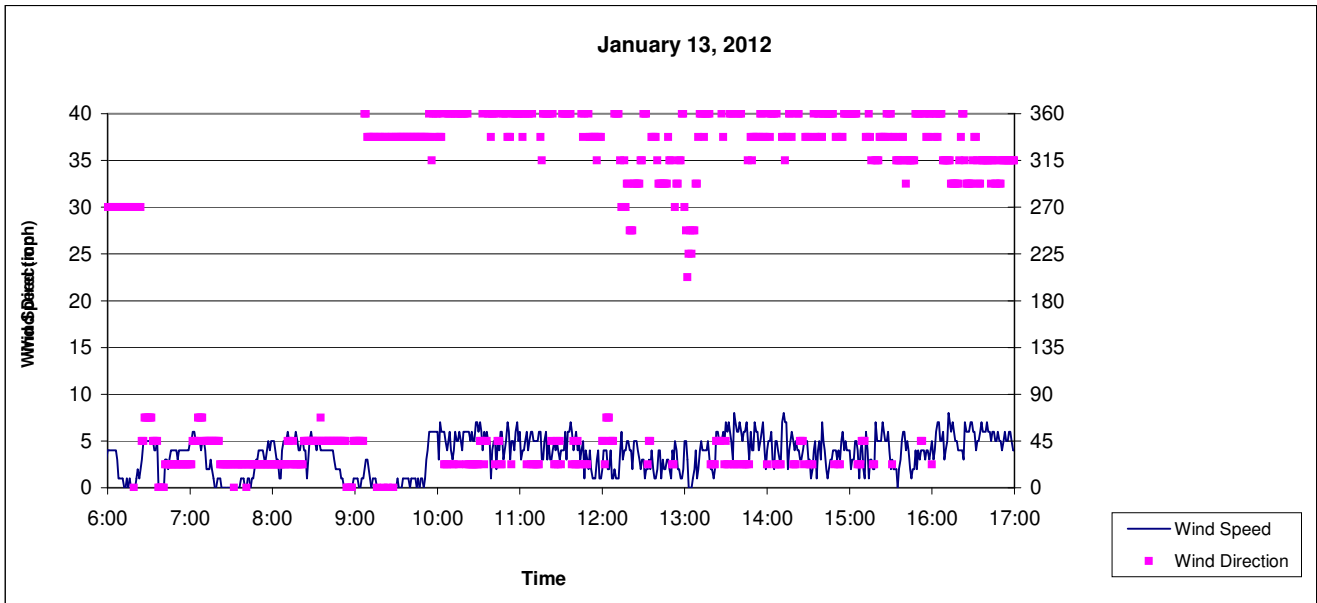
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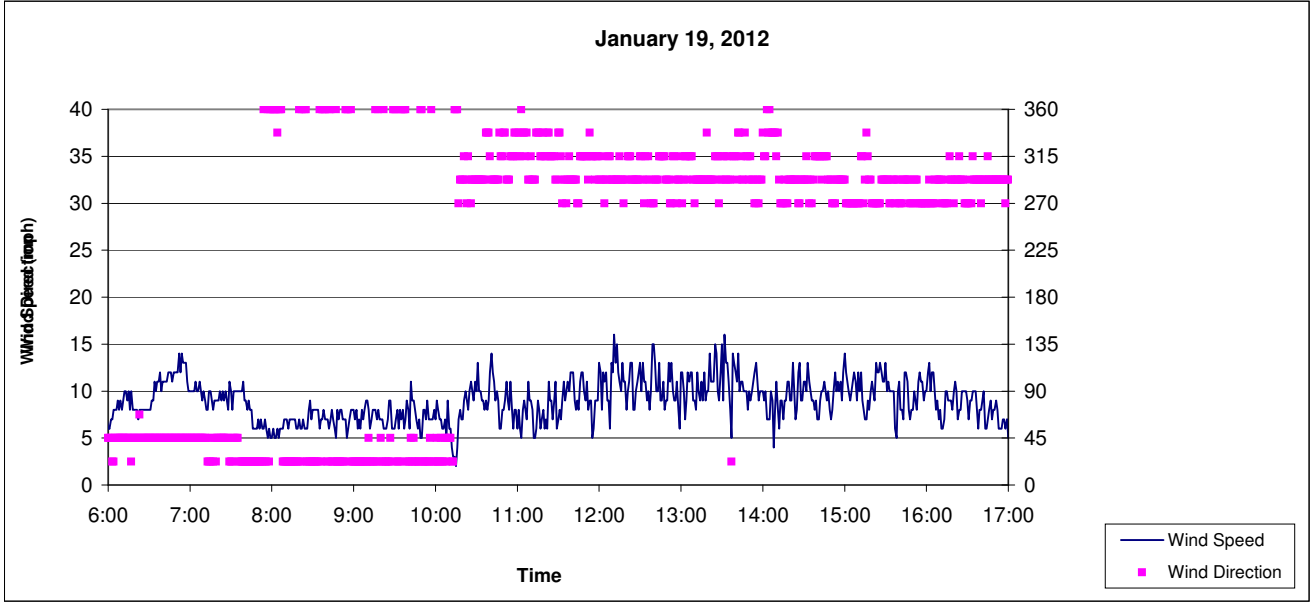
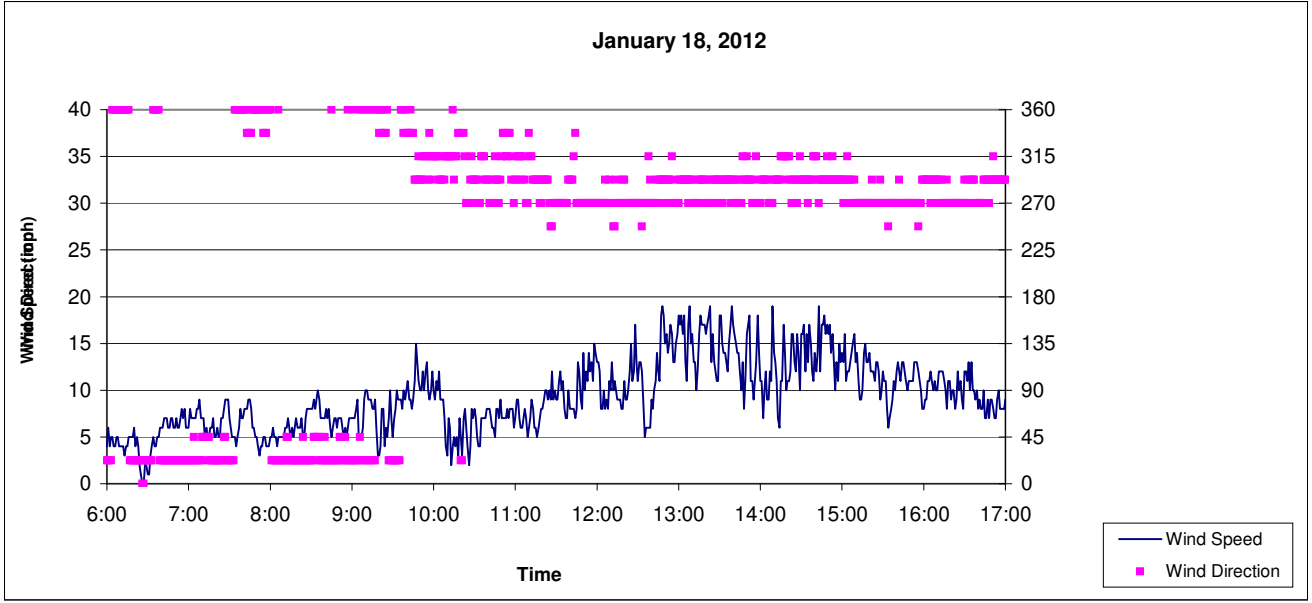
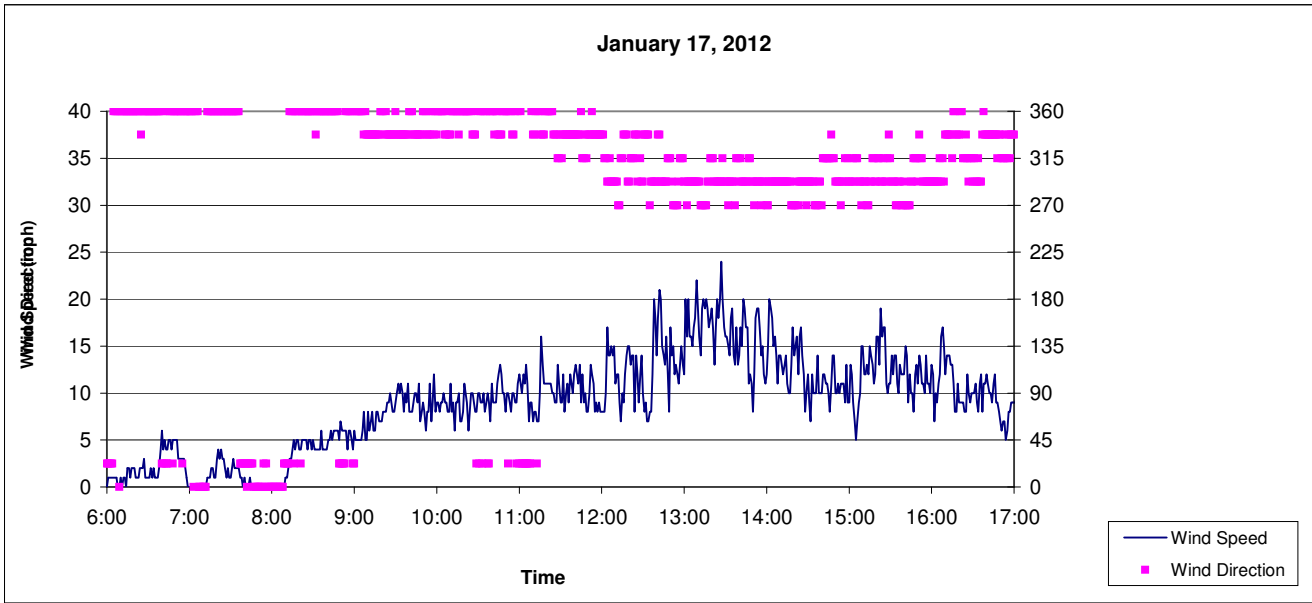
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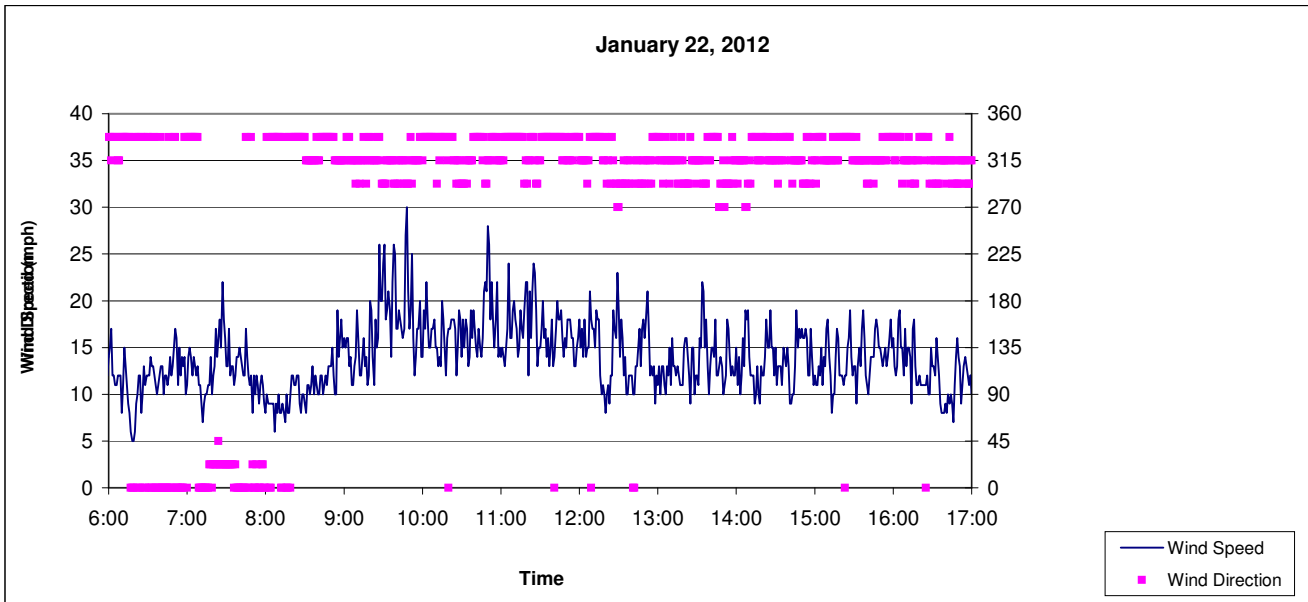
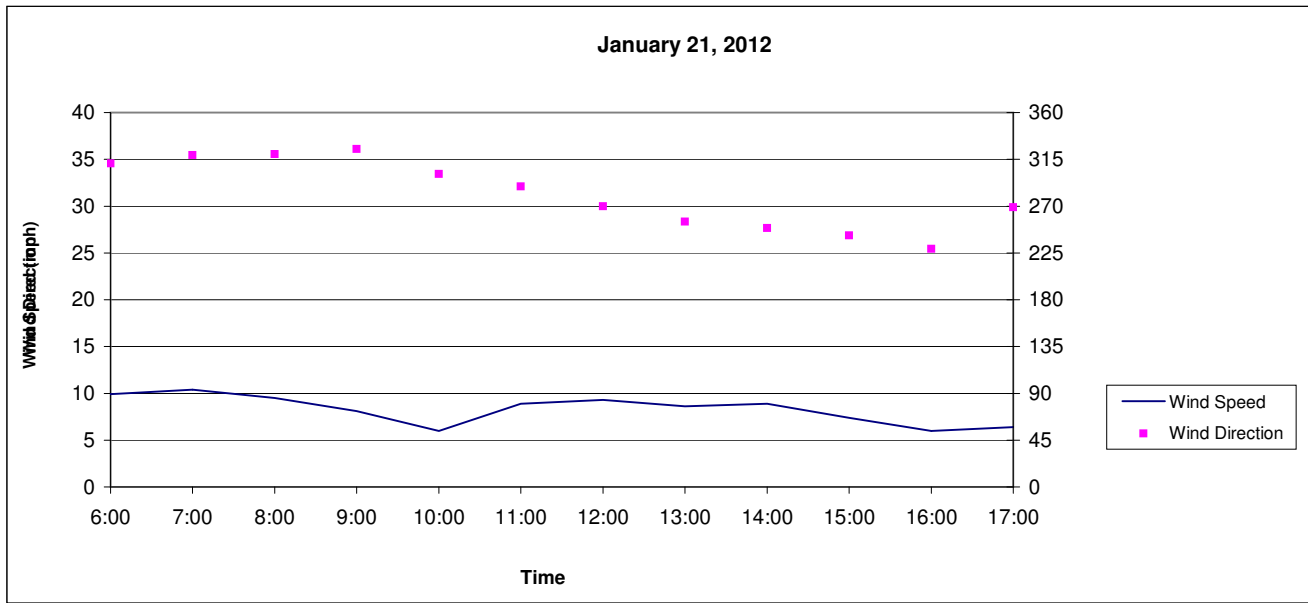
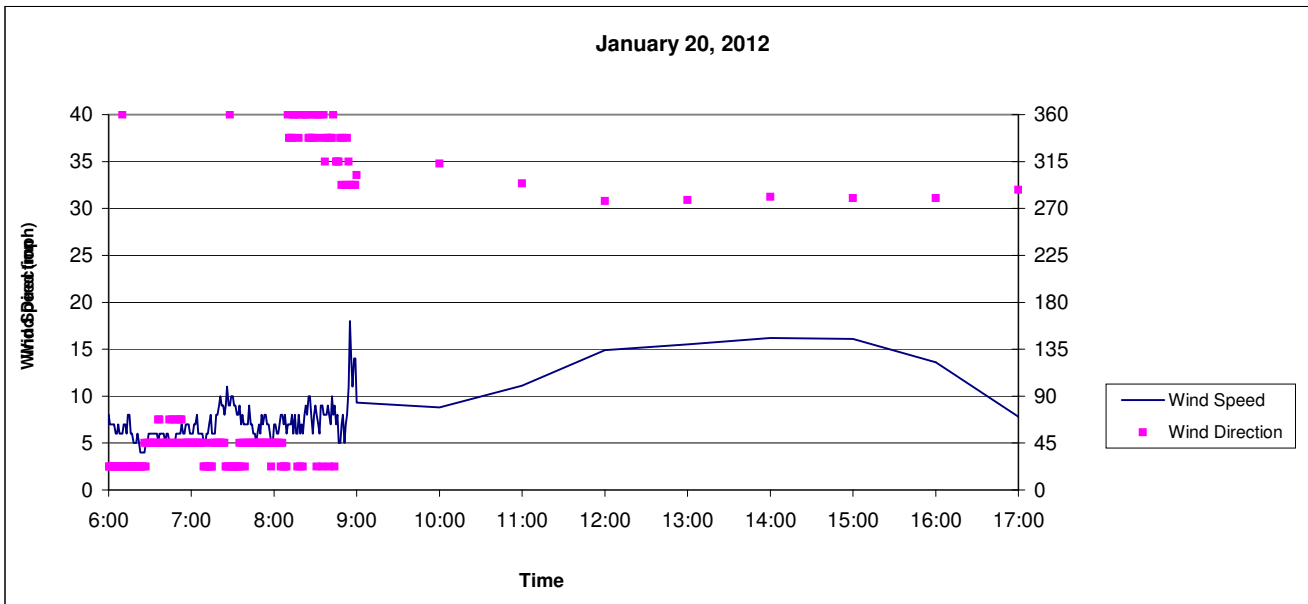


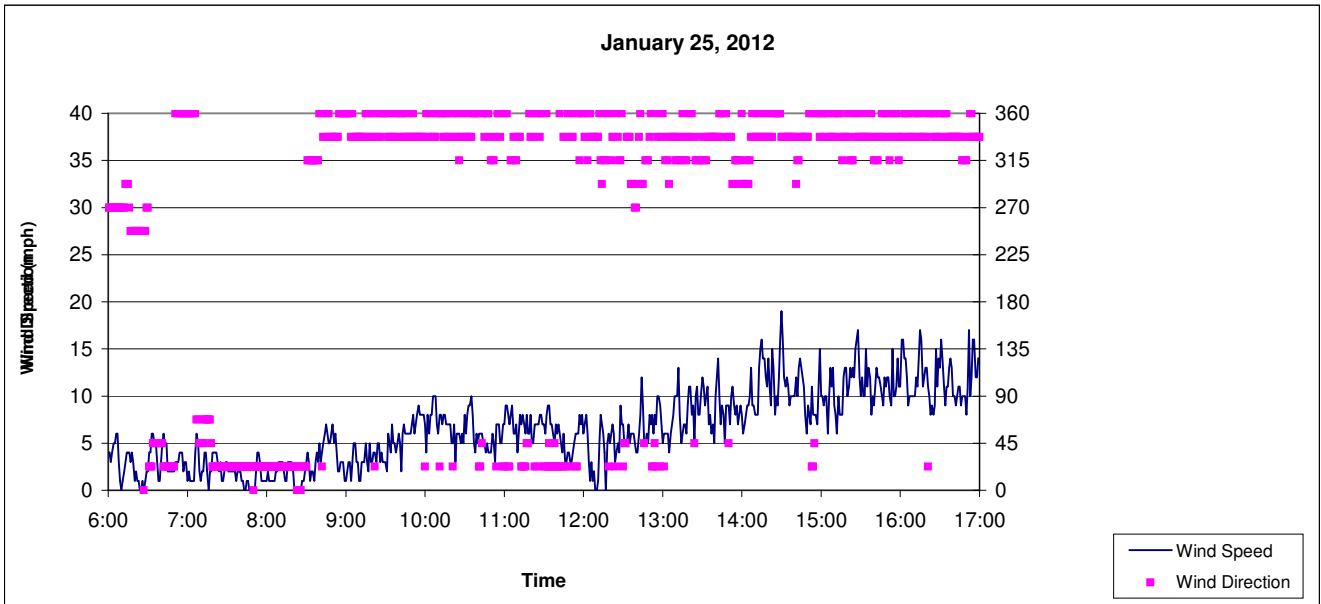
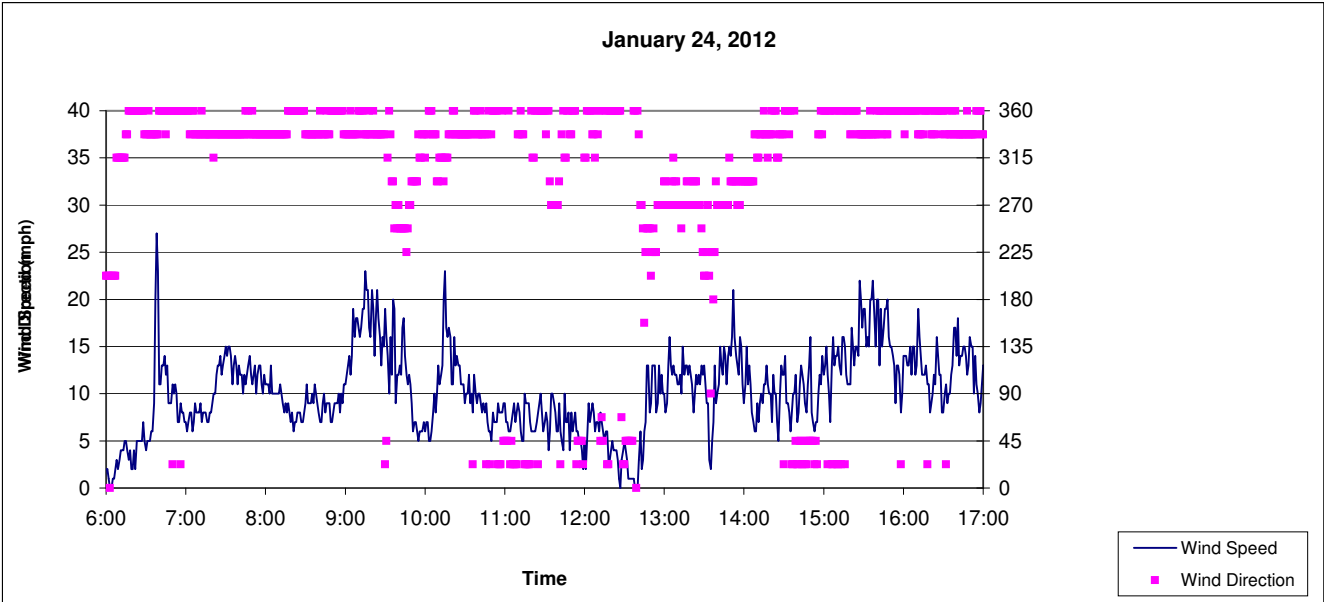
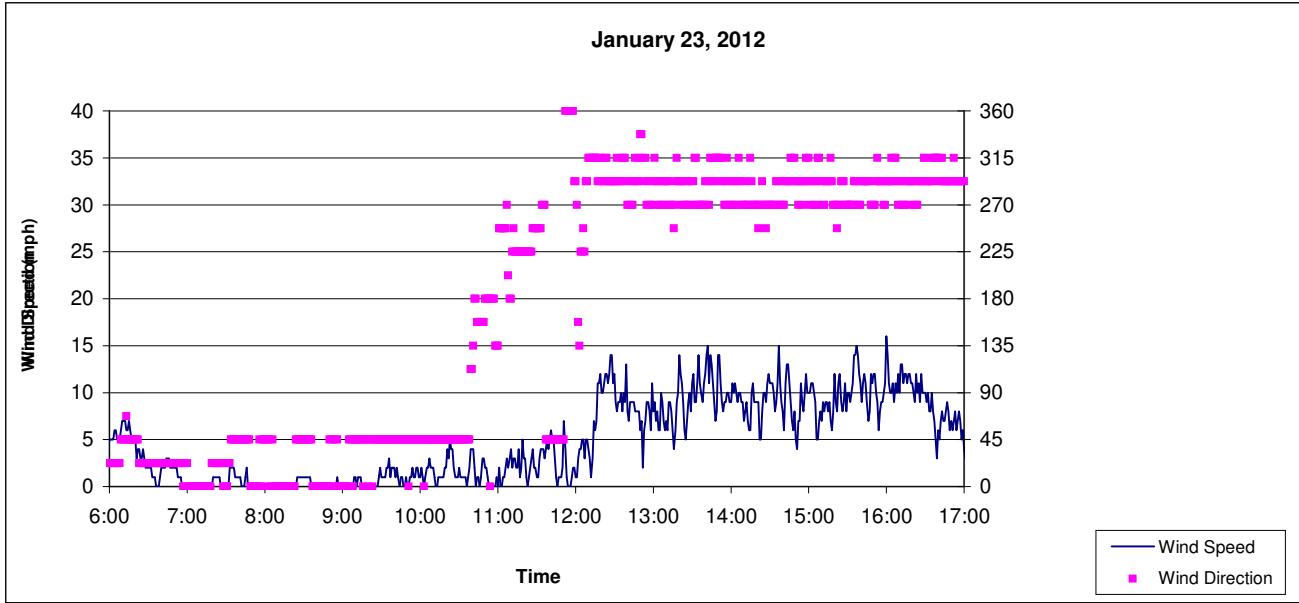


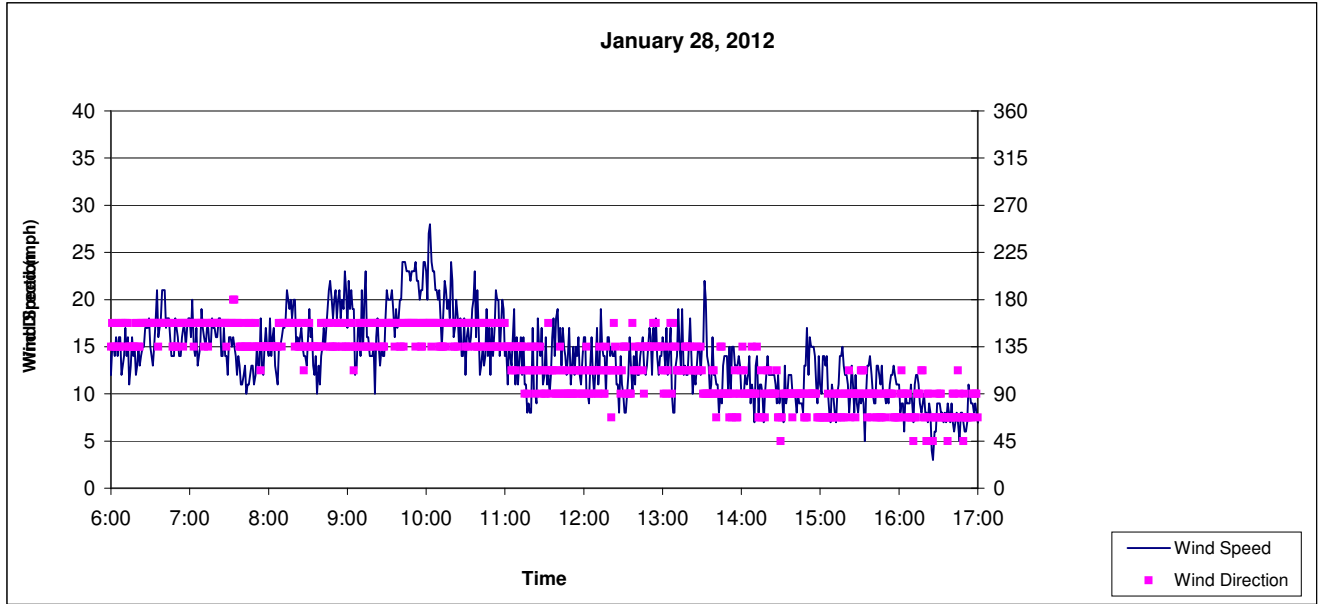
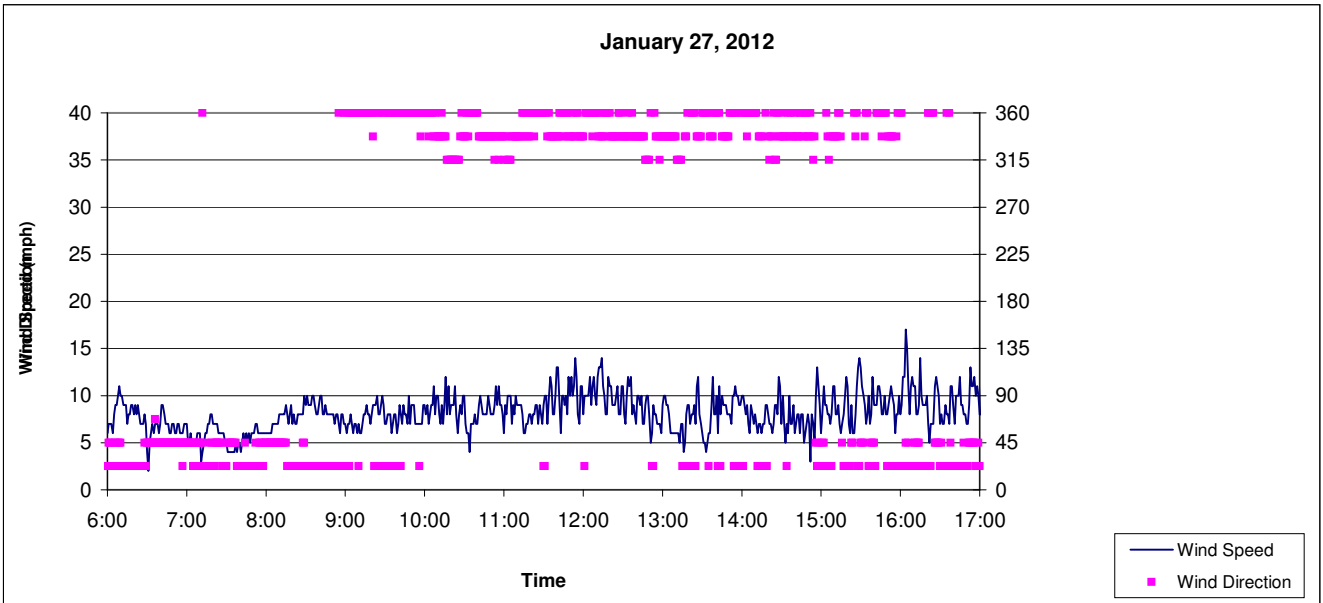
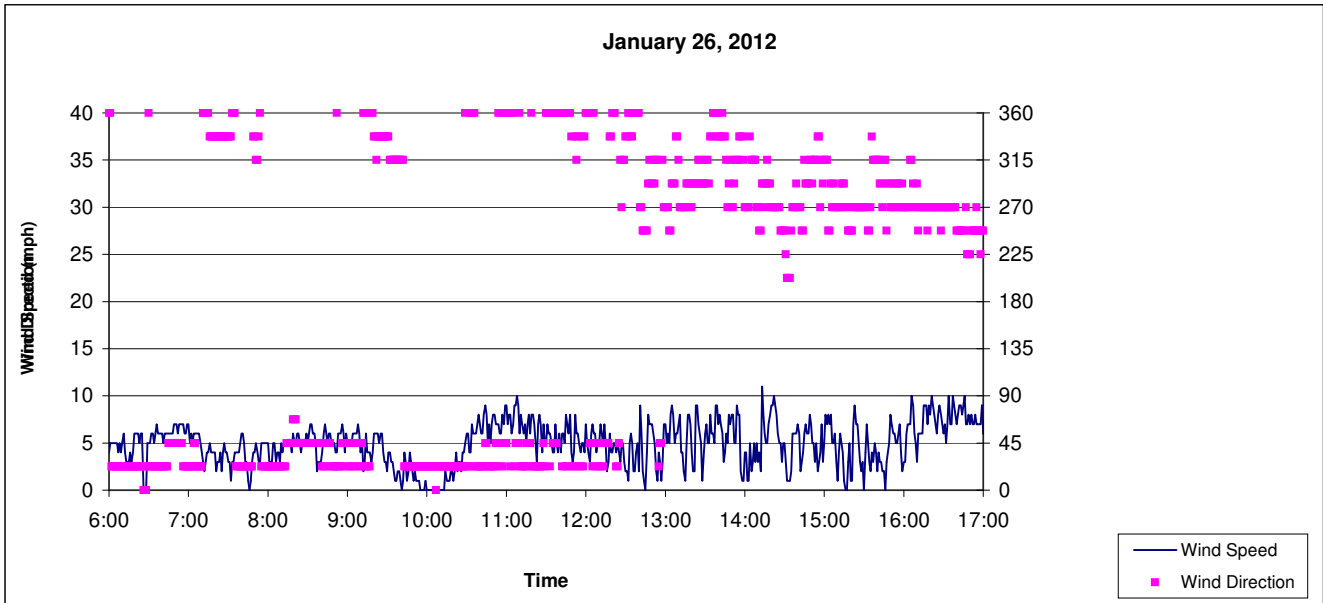




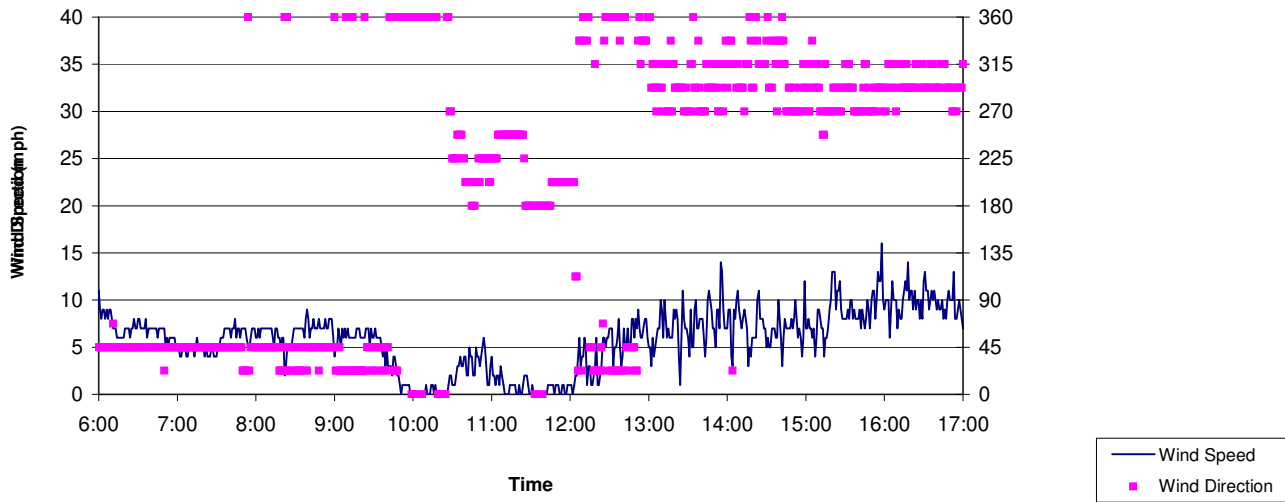








January 30, 2012



January 31, 2012

